



Wadham College

COVID Early Alert System

Controller: Wadham College

Controller contact: Domestic Bursar

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1. Identify the need for Data Protection Impact Assessment (DPIA)

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

As a result of the COVID-19 global pandemic measures have been introduced in the University to test staff and students for the COVID-19 virus, should they consider themselves to be symptomatic. The process is supported by Public Health England (or successive bodies) and CQC registered in the case of student testing. Wadham and the collegiate university have promulgated protocols to all staff and students on actions to take in the event of a potential infection.

Cases and clusters protocols

Test results from the Early Alert System (EAS) will be submitted to the Single Point of Contact (SPOC) at Wadham via the Lodge. The SPOC, supported by the Accommodation, Sales & Events (ASE) team, will subsequently inform other departments within the College for the purposes of household self-isolating, welfare, catering support, educational support and to prevent any further infection by College members accessing isolating areas without knowing that they are isolated. The Lodge and ASE teams follow detailed

protocols and have received letters setting out the importance of confidentiality in handling and processing this data.

As a result of this sharing of information personal to the positive or self-isolating individual, which includes special category medical data, a DPIA is deemed necessary.

2. Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

The information will come from the testing centre via the University Security Services to the SPOC. The SPOC, supported by the ASE team, will send confirmation emails (via secure email using a password protected document) to the Academic Office and Welfare team. Limited information (room number and COVID status) is sent by secure email to Housekeeping, Catering, Maintenance, Pandemic Executive team, DWB site manager and Merifield site manager for the purposes outlined. We will only retain the data for as long as we need it to meet our purposes, including any relating to legal, accounting, or reporting requirements. Further information on our retention periods for personal data is available in our privacy policies for staff and students found here: <https://www.wadham.ox.ac.uk/governance/wadham-college-gdpr-framework>. The University has a separate privacy notice available when booking the test. See <https://www.ox.ac.uk/coronavirus/health/covid-testing> in the “What about Privacy” Section.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The data falls under special category - data concerning health. The data fields will include the contact data and whether they tested positive or negative for Covid-19. At this point it is unknown how much data will be stored and how many individuals will be affected by collecting and storing this data. The data will cover all Wadham students living in College-owned accommodation and staff. We will also, for welfare and educational purposes, retain data for students and staff who do not live in College accommodation on the same basis and for the same periods. Data will be retained for 1 year after it is recorded. It may be anonymised to retain dates of infection and self-isolation.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Given the global pandemic, students and staff have been advised via the staff and student policies on COVID testing (<https://www.ox.ac.uk/coronavirus/health/covid-testing>) and will expect that we will use positive test result data to protect them and the community from further infection. They will expect that we will use the information for the purpose of welfare, social, educational and practical support to them. There is the possibility that an individual whose data is used will be under 18, but over 13 in every case. The process proposed is only novel in its potential endurance and nature; similar processes would be in place for other communicable diseases such as norovirus. There are no foreseeable areas of public concern regarding the holding of this data for the duration proposed.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

To hold necessary data on whether staff and students are infected with COVID-19 so that we can take the necessary steps, as per our written protocol. Our intended effect is to protect the individuals involved, protect our community and to protect the vulnerable in wider society whilst providing services and support to those who require it.

3. Consultation Process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

We have informed students and staff that we will be processing their data should they test positive or negative for COVID-19 through the EAS. The processing of such health data is necessary for the purpose of meeting our health and safety obligations to our members. Our DPO has been consulted on our Privacy Notice with regards to our use of the EAS and with this DPIA. Finally the EAS is a voluntary service provided by the University.

The EAS Privacy Notice is available here: <https://earlyalert.medsci.ox.ac.uk/earlyalert/booking/privacy>.

4. Assess Necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

We need to process data for these purposes to operate safely which is a task we carry out in the public interest. Data will be processed for these purposes only. We will only use the data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use the data for an unrelated purpose, we will seek the consent of the individuals involved to use it for that new purpose. Again the service is voluntary so those getting tested will have done so in the full knowledge that they are using a service provided by the collegiate university.

5. Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

1-Loss or breach of data	Remote	Minimal	Low
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6. Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated reduced accepted	Low medium high	Yes/no
1-	Storage locations of this data will be protected by credential based authentication. Storage areas are behind firewalls that are continuously monitored for threat and detection. Servers are continuously monitored to ensure they have up to date service packs and any other security update. The data itself is low grade and would not pose a threat to the data subjects if it were breached.	Reduced	Low	Yes

7. Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	The College’s Pandemic Executive Group	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed

<p>Summary of DPO advice:</p> <p>The policy follows the guidance for the Conference of Colleges.</p> <p>The access and security of the data has been assessed and controlled.</p> <p>The retention periods will be added to the Colleges retention schedule.</p> <p>All covid policies and processes will be kept under review due to the changing nature of the pandemic and Government advise.</p>		
<p>DPO advice accepted or overruled by:</p>		<p>If overruled, you must explain your reasons</p>
<p>Comments:</p>		
<p>Consultation responses reviewed by:</p>		<p>If your decision departs from individuals' views, you must explain your reasons</p>
<p>Comments:</p>		
<p>This DPIA will kept under review by:</p>		<p>The DPO should also review ongoing compliance with DPIA</p>