

Privacy Notice – COVID 19 Data Processing: Staff

The Data Controller of the information being collected is:

West College Scotland, Clydebank Campus, Queens' Quay, Glasgow. G81 1BF
ICO Registration Number: ZA004894

For any queries or concerns about how your personal data is being processed you can contact the Data Protection Officer at: dpo@wcs.ac.uk

This privacy statement relates to the following process:

The College requires to ascertain the COVID related health status of all employees during the COVID epidemic, particularly to assess health risks as employees return to work after lockdown, and beyond.

Your information will be used for the following purposes:

The purpose of the processing is to ensure the health and safety of all individuals who attend the College in any capacity. The data processed will contain a status return (yes/no) for various conditions which will be risk assessed to ensure that working conditions can be adapted to create the safest conditions possible for employees and other college attendees.

The College will not process medical details related to the declared status.

Where the college does process special category data, to support staff and to make reasonable adjustments, such processing will be covered by the main employment privacy notice, which is available here:

<https://www.westcollegescotland.ac.uk/media/208421/staff-personal-data-statement.pdf>

The following personal data being used for this process has originated from a third party:

Individual status (yes/no) in the following categories:

- **extremely high clinical risk** (shielder)
- **very high clinical risk** (combined effect of clinically assessed comorbidities)
- **increased clinical risk** (based on government guidelines on specified 'increased/clinically vulnerable' risk groups)
- **likely increased clinical risk** (combined effect of clinically assessed comorbidities)
- **standard clinical risk** (no health conditions or risk factors that would place an individual in any of the categories above)

For Scottish Government guidance on specific medical conditions, visit:

<https://www.gov.scot/publications/coronavirus-covid-19-tailored-advice-for-those-who-live-with-specific-medical-conditions/>

The data originates from these sources:

The data will be obtained from the College's occupational health provider, or suitably medically qualified professionals, or from the data subject.

Our lawful basis for using the data is/are: (delete as appropriate)

Use is necessary for us to comply with a legal obligation.

Health and Safety at Work etc Act 1974,

2. General duties of employers to their employees.

The data being used does not include special category (sensitive) data.

Your data will, or may, be shared with the following recipients or categories of recipient:

College Occupational Health Service provider (Integral). Any health data processed relating to occupational health referrals will be processed under the College's main employment privacy notice, as linked above. You can view Integral's Privacy Notice here:

<https://www.integraloh.com/privacy-policy-W21page-67>

This process does not involve your data being sent outside of the European Union.

The processing of your data does not involve automated decision making.

Your data will be retained until conditions prevalent during the COVID pandemic no longer apply.

The following rights are rights of data subjects:

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

The following rights apply only in certain circumstances:

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data. Contact: casework@ico.org.uk