

Privacy Notice for the collection of COVID-19 vaccination data

The University of Bradford is a data controller as defined in UK law. The Department for Education has asked Universities to obtain and share anonymised data relating to the percentage of students who have had COVID-19 vaccinations.

This document sets out how the University is processing anonymised student COVID-19 vaccination data.

Under what legal basis does the processing of my personal data take place?

The UK data protection law we must have a legal basis under which processing of personal data may take place. In this case, the following legal basis applies:

***Public Interest;** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.*

Collecting this information is in the public interest as it is necessary for the Government to understand where there are areas of the population that may have lower than average vaccination rates to allow it to initiate additional communications and vaccination programmes to increase those vaccination rates.

Furthermore, as we are collecting personal data relating to health, we must have a further legal basis. In this case the following additional legal basis applies:

***Consent;** the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.*

The University is asking you to provide this information. You are under no obligation to do so and so we can only obtain this information if you choose to give it to us.

What categories of personal data are used?

We will be collecting the following information from you and adding it to your student record:

- whether you have had no, one or two COVID-19 vaccinations or whether you have chosen not to tell us.

Where do we get your personal data from?

We will be obtaining this information from you.

Who else do we pass this information on to?

We will be aggregating the information for the whole University and providing information to the Office for Students for onwards disclosure to the Department for Education – also in an anonymised form.

This means that we will not be providing personal data about any students and the Government will not be able to identify any persons from the information we provide.

Do we transfer the information overseas?

No.

How long do we keep this information for?

We will retain this information for up to one year and then delete it.

What are my rights as a data subject?

As a person whose personal data is processed by the University, you have certain rights in respect of that personal data. In respect of the information the University holds about you, the following rights are relevant:

- ***The right to be informed:*** You have the right to be informed about the collection and use of your personal data: the University recognises this right by providing this privacy notice.
- ***The right of access:*** Upon request you may access or receive a copy of your personal data held by the University as well as other supplementary information to help you understand how and why the University is using your personal data;
- ***The right to rectification:*** If the personal data we hold about you is inaccurate or incomplete you may request that it be corrected;
- ***The right to erasure:*** You can request the erasure of your personal data where there is no compelling reason for its continued processing;
- ***The right to restrict processing:*** You may request the restriction of the processing of your personal data in certain circumstances, limiting the way that the University uses your data. This is an alternative to requesting the erasure of their data.
- ***The right to data portability:*** You may request that a copy of the personal data you provided to the University be provided to you or another controller in a structured, commonly used and machine-readable format.
- ***The right to object:*** If you object to the processing of your personal data. You have an absolute right to stop your data being used for direct marketing but in other cases this right is only applicable in certain circumstances and the University may continue to process it if there is a compelling reason for doing so.
- ***Rights in relation to automated decision making and profiling:*** these rights are enshrined in UK law but the University does not undertake automated decision making or profiling in respect of COVID-19 vaccination data.

Please note that the above rights are not absolute and the University may be entitled to refuse requests where exceptions apply.

You also have the following rights:

- To withdraw your consent for the collection of your personal data; and
- To complain to the Information Commissioner's Office about the way in which we process your personal data.

If you wish to exercise any of these rights, please contact the University's Data Protection Officer (data-protection@bradford.ac.uk).

Where can I get more information?

For more information please contact the University's Data Protection Officer, Matthew Stephenson, data-protection@bradford.ac.uk, University of Bradford, Richmond Road Bradford BD7 1DP.

You also have the right to complain to the University and the Information Commissioner's Office about the way that the University has processed your personal data. If you wish to exercise any of these rights, please contact the University's Data Protection Officer as above.

The contact details for the Information Commissioner's Office can be found here:
<https://ico.org.uk/global/contact-us/>

Written by:	Matthew Stephenson, UoB DPO	Approved by:	Nikki Pierce, UoB Academic Registrar
Date Approved:	29 September 2021	Next Review Date:	29 September 2022
Version Number:	V0.2		