

St Catherine's College, Oxford
COVID-19 Early Alert Service – Data Protection Impact Assessment

Controller Details	
Name of controller	St Catherine's College, Oxford
Project	COVID-19 Early Alert Service
Name of controller contact	Justine Pila
1. Rationale for this DPIA	
<i>Explain broadly what the 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.</i>	<p>The GDPR requires data controllers to conduct a DPIA before commencing data processing that is likely to result in a high risk to the rights and freedoms of natural persons, particularly where new technologies are involved.</p> <p>As a result of the COVID-19 pandemic, and in alignment with National Health Service (NHS) and Public Health England (PHE) guidance and procedures, the University of Oxford has introduced a voluntary COVID-19 Early Alert Service (EAS) to provide staff and students of the collegiate university with rapid and free access to COVID-19 testing. When registering to use and when using the EAS, individuals provide information about themselves (personal data) to the University, including sensitive personal data regarding their health. If an individual is a member of the College, some of those data are shared with the College in accordance with the University's EAS Privacy Notice. These are data that the College needs to process in order to limit the spread of COVID-19 and fulfill its educational and other charitable objectives in a manner that protects the safety and wellbeing of its members and the wider community, including by identifying and providing domestic, welfare and pedagogical support to persons who need to self-isolate for COVID-19 related reasons (DP Purposes). For these reasons, a DPIA is deemed to be necessary.</p>
2. The Processing to be Undertaken	
The nature of the processing <i>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 another way of describing data flows. What types of processing identified as likely high risk are involved?</i>	The personal data will be provided by email to a single designated access point within the College. From that point, the data will be shared within the College as required to fulfill the DP Purposes and in accordance with the College's EAS Privacy Notice. Data regarding students will usually be shared with the Master, the Dean, the student's Director(s) of Studies, and the College's housekeeping and catering departments. Data regarding staff will usually be shared with the Master, the Senior Tutor or Domestic Bursar, and the Personnel Advisor.
The scope of the processing <i>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?</i>	The data will include special category (sensitive) personal data regarding individuals' health. The volume of data processed and the frequency of its processing will depend on the number of College members who register to use and who use the EAS, which cannot be predicted. The number of persons potentially affected is approximately 1,200 people, being the total number of College staff and students. The geographical area potentially affected is the College's Manor Road site and the other properties in and around

	Oxford in which College staff and students live. Data will be kept only for as long as necessary to fulfill the DP Purposes and the College's legal duties. Data regarding a negative COVID-19 test result will usually be deleted immediately, while data regarding a positive COVID-19 test result will usually be stored for the duration of the individual's period of self-isolation or illness, whichever is longer.
<p>The context of the processing</p> <p><i>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)?</i></p>	The College is a charitable organisation that exists to advance learning, education and research in the arts and the sciences, and to fulfill the other charitable objectives described in its Charter . To these ends, it engages a range of academic and non-academic staff and provides accommodation and teaching to different categories of student. In light of the COVID-19 pandemic, members of the College and wider community will expect appropriate measures to be in place within the College to ensure that its educational and other objectives are pursued in a manner that protects their health and wellbeing, and that persons with symptoms or a diagnosis of COVID-19, or with significant exposure to COVID-19, are identified and supported appropriately. The individuals affected by this project will potentially include children and other vulnerable persons, including persons with learning difficulties. The processing will not raise public or security concerns beyond those raised by similar types of personal data processing, and restricting the data processing in the manner proposed will ensure that these concerns are minimised.
<p>The purposes of the processing</p> <p><i>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?</i></p>	The College seeks to fulfill the DP Purposes in furtherance of the public interest and fulfillment of the College's health and safety obligations to its staff, students, and visitors.
3. Consultation Process	
<p><i>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?</i></p>	This project has been devised by the College's COVID-19 Steering Group, comprising its Officers, and approved by the College's Governing Body, comprising its charitable trustees and representatives of its undergraduate and graduate student communities. The College has informed all staff and students of its intention to process their personal data in the manner and for the purposes described in this DPIA by means of a Privacy Notice describing the relevant data processing arrangements.
4. Necessity and Proportionality	
<p><i>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</i></p>	The data processing is an essential, effective and proportionate means of protecting the public interest and meeting the College's health and safety obligations to its students, staff and, visitors. The data processing will be limited to what is necessary to achieve the DP Purposes and to fulfill the College's legal obligations. Data will not be used for any unrelated purposes without the data subjects' explicit consent. All data processors will be required to take appropriate security measures to protect the data, in accordance with the University's and College's Information Security and Data Protection policies and procedures.

<i>processors comply? How do you safeguard any international transfers?</i>			
5. Risks			
<i>Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.</i>	<i>Likelihood of harm (Remote, possible or probable)</i>	<i>Severity of harm (Minimal, significant or severe)</i>	<i>Overall risk (Low, medium or high)</i>
Inadequate organisational or technical security measures resulting in unauthorised access to the data, data loss, or data breach due to cyber-attack or other technical weakness.	Remote	Minimal psychological distress to the data subject giving the limited nature of the data; significant reputational damage to the College	Low
6. Risk Reduction Measures			
<i>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5.</i>			
<i>Options to reduce or eliminate risk</i>	<i>Effect on risk (Eliminated, reduced or accepted)</i>	<i>Residual risk (Low, medium or high)</i>	<i>Measure approved (Yes or no)</i>
The data processors will be required to comply at all times with the University's and College's Information Security policies and procedures and with the College's EAS Privacy Notice. Data will be stored in secure email accounts that require credential-based authentication to access, and on servers behind firewalls that are continuously monitored for security. The data are such that any data breach would not pose a significant threat to the data subjects.	Reduced	Low	Yes
7. Sign Off and Record Outcomes			
Item	Name/position/date	Notes	
<i>Measures approved by:</i>	The Governing Body		
<i>Residual risks approved by:</i>	N/A	<i>If accepting any residual high risk, consult the ICO before going ahead</i>	
<i>DPO advice provided:</i>	17 September 2020	<i>DPO should advise on compliance, step 6 measures, and whether processing can proceed</i>	
<i>This DPIA will be kept under review by:</i>	The COVID-19 Steering Group	<i>The DPO should also review ongoing compliance with the DPIA</i>	

Date of Governing Body approval: 22 September 2020