COVID-19 reporting, self-isolation and report and trace policy

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(Please note: policy will regularly be reviewed)

**Introduction and context**

University of the Arts London (UAL) supports the NHS Test and Trace scheme by promoting the guidance for individuals who have tested positive for coronavirus (COVID-19) or report they may have symptoms. UAL will also support the NHS Test and Trace team to identify people through our own Report and Trace Process to identify those who have been in possible close contact with someone who has a positive diagnosis for the virus.

Staff and students will be asked to report to the university via the reportcovid form which is available on the UAL internal and external web site and reportcovid@arts.ac.uk if they have tested positive for COVID-19 and have been on a UAL site 48 hours before first having symptoms of the virus.

The information provided will be collected in line with GDPR requirements and will not be used for any other purpose and deleted after 21 days. UAL will also keep a record of attendance of staff and students on site. UAL will only pass on any information when specifically asked to do so by PHE.

**Purpose**

This document sets out UAL’s approach that needs to be followed by students, staff, contractors, SU and other third-party colleagues and visitors in relation to:

1. **Testing and Self-isolation** requirements for anyone with **symptoms** of coronavirus (COVID-19)
2. **Self-isolation** requirements for anyone who has been in **close contact with someone who has tested positive** for coronavirus (COVID-19)
3. **Arrangements for advising** all affected individuals if they have been in close contact with someone who has tested positive for coronavirus (COVID-19) while on a UAL site.

UAL continues to follow government to reduce the likelihood of the virus spreading guidelines and continues to promote social distancing where possible and COVID-safe measures via our [Community Pledge](https://www.arts.ac.uk/communitypledge). This document forms part of those measures. The arrangements also meet the requirement for organisations to have contact tracing procedures to support the NHS Test and Trace programme.
Testing and Self-isolation requirements for anyone with symptoms of coronavirus (COVID-19)

Testing

In line with the Community Pledge, the UAL community is encouraged to self-test on a regular basis. LFT tests are available for collection at the following sites:

- Central Saint Martins – Kings Cross
- London College of Communication – Elephant and Castle
- London College of Fashion – Curtain Road, John Princes Street, Lime Grove
- Chelsea College of Art - Embankment
- Camberwell College of Art – Peckham Road site
- Wimbledon College of Art – Wimbledon

More information on testing can be found on the NHS website. (See FAQs for more detail on how and where to get tested).

Testing positive / negative

Students and staff who receive a positive NHS test result for COVID-19 must report the outcome of their test using the ‘report covid’ form. Visitors or contractors who test positive are asked to report through their event or meeting organiser, or the manager who arranged their visit – the form will be completed on their behalf by the person who arranged the visit.

In addition, staff members who test positive for COVID-19 must contact their line manager and follow the standard sickness reporting process via iTrent, using the COVID-19 sickness category.

People who test negative for COVID-19 can stop self-isolating and are expected to attend work or studies as normal.

Self-isolation and testing requirements for those with symptoms of coronavirus (COVID-19)

When to Self-Isolate

Anyone with Covid 19 symptoms, however mild, should self-isolate straight away and get a PCR test (a test that is sent to the lab) available through GOV.UK as soon as possible and continue to self-isolate until they get a result. This means not leaving their accommodation for any reason other than getting a test.

NHS define the main symptoms of Covid 19 as:

- a high temperature
- a new, continuous cough
- a loss or change to your sense of smell or taste
You should also self-isolate straight away if:

- you've tested positive for COVID-19 – this means you have the virus
- someone you live with has symptoms or tested positive (unless you are not required to self-isolate – check below if this applies to you)
- you've been told to self-isolate following contact with someone who tested positive – find out what to do if you're told to self-isolate by NHS Test and Trace or the NHS COVID-19 app

Anyone who has symptoms should continue to self-isolate while waiting for the results of their test. If their test result is positive, it is essential to continue self-isolating for 10 days from the start of their symptoms to prevent transmitting the virus to other people.

They may need to self-isolate for longer if you get symptoms while self-isolating or if the symptoms do not go away.

If coronavirus symptoms get worse, it is important that you seek medical attention.

- Get help from NHS 111 online
- Call 111 if you cannot get help online.

Do not go to places like a GP surgery, hospital or pharmacy.

Tell people you've been in close contact with that you have symptoms

Tell people you've been in close contact with in the past 48 hours that you might have COVID-19 and report via reportcovid@arts.ac.uk

You should tell them to follow advice on how to avoid catching and spreading COVID-19. They do not need to self-isolate unless they're contacted by the NHS Test and Trace service.

If they get any symptoms of COVID-19, they should self-isolate and get a test as soon as possible.

Self-isolation requirements for anyone who has been in close contact with someone who has tested positive for coronavirus (COVID-19)

Definition of ‘close contact’

A close contact is described by the NHS as:
- You have had face to face contact with someone under 1 metre (regardless of the length of time)
- You have been within 1-2 metres of someone for more than 15 minutes
- You spend a lot of time in the person's home (e.g. cleaner).

When you do not need to self-isolate

If someone you have had close contact with has symptoms of COVID-19, or has tested positive for COVID-19, you will not need to self-isolate if any of the following apply:

- you're fully vaccinated – this means 14 days have passed since your final dose of a COVID-19 vaccine given by the NHS or you have a vaccine recognized at the UK border - details can be found here
• you’re under 18 years, 6 months old
• you’re taking part or have taken part in a COVID-19 vaccine trial
• you’re not able to get vaccinated for medical reasons

However, if you live with or have been in contact with someone who may have the Omicron variant of COVID-19, this does not apply and you’ll still need to self-isolate. NHS Test and Trace will contact you if this is the case.

Even if you do not have symptoms, you should still:
• get a PCR test on GOV.UK to check if you have COVID-19
• follow advice on how to avoid catching and spreading COVID-19
• consider limiting contact with people who are at higher risk from COVID-19

A close contact will need to isolate if:

One or more of following criteria apply
• they have only received one vaccination.
  
or
• they have not been vaccinated at all
  
or
• their final vaccination took place outside of the UK vaccination programme

they will need to self-isolate for 10 days to help prevent the spread of Covid-19 within the community.

They are also required to take a COVID PCR test. You can find details of how to do this here

Arrangements for reporting a positive test result for coronavirus (COVID-19) and report and trace

When an individual receives confirmation from the NHS that they have tested positive for the COVID virus and that they were present on a UAL site 48 hours before experiencing symptoms, will be required to advise the University of the outcome through the ‘report covid’ form. The link directs the individual to an on-line form and they are guided through a series of questions about when they first developed symptoms and are asked to provide as much information as possible about where they have been on the university campus and where that contact took place. Visitors and contractors who test positive are asked to report through their event or meeting organiser/manager who will complete a form on their behalf.

The University is required, in certain circumstances, to collect this information not only to support NHS Test and Trace to contact staff and students that they may have had close contact with, but also to alert relevant University services such as H&S, estates (for cleaning), libraries, halls of residence, catering services etc. that a positive case has been reported.

UAL Report and Trace procedure does not replace the NHS Test and Trace Procedure but is designed to support the NHS process and provide support and guidance for individuals who have tested positive as well as those who have had close contact with someone who has tested positive. All who test positive may also be contacted separately by NHS Test and Trace service.

It is important that when reporting, as much information is provided as possible. The University can also check through its timetabling and booking systems to support the identification of those who may have had contact in order that they can be sent
current government advice,

Line managers must keep a record of which staff were present on site and in which areas for 28 days unless this information is known to be available and easily accessible elsewhere, for example if captured by card access data.

**Arrangements for contractors / SU or other third-party colleagues / visitors who have tested positive for COVID-19, while on a UAL site.**

**Contractors, the Students’ Union and other third-party colleagues**

Managers who lead on the university’s partnership arrangements with contractors, the Students’ Union and other third-party colleagues (for example, INIVA) are responsible for arrangements being in place to ensure:

i. The university is advised promptly when a contractor, SU or other third-party colleague tests positive, including information about when they developed symptoms and where they were working in the 48 hours before they developed symptoms.

ii. Contractors, the SU and other third parties keep a rolling 28-day record of their staff members who are on site.

**Visitors**

Estates, Accommodation and College managers who lead on the university’s arrangements for receiving and admitting visitors to university sites are responsible for ensuring:

i. All visitors and contractor visits are notified in the usual way *in advance* of the visitor/contractor entering a UAL site

ii. A rolling 21-day record of visitors is maintained containing information required to support contact tracing (the retention period will be longer where the information is also required for normal security and premises access purposes).

iii. Visitors are provided with information on the university’s social distancing and hygiene measures in respect of COVID-19.

iv. should UAL be advised that a non-UAL person has tested positive while visiting or working on the site the manager responsible for engaging/inviting that person to UAL should provide the details to the **report covid** form. The source of the information should be recorded along with the reason for believing it is accurate.

v.

**Record keeping and data protection**

The systems listed below will make up (at minimum) a rolling 21-day record of staff and students attending UAL sites, to support contact tracing.

- Celcat, Moodle, Blackboard, I’m in, Salto, ControlSoft, InfoSmart and ORB for course groups (records will cover who is expected on site that day rather than who attended).
- Booking records for making spaces.
- Library and canteen user records.
- Visitor and card access records.
- Records maintained by line managers of staff on-site.
- Records maintained by contractors, Students’ Union and other third parties of colleagues on-site.

To protect personal privacy, when contacting staff and students to notify them of close contact under these arrangements, the University or PHE **will not** reveal the identity of individuals who report a positive test result. Data will only be shared internally in order to identify close contacts (for example, with Accommodation Services) and only shared externally with NHS or Public Health England if we are asked to do so.
Records will be maintained, and information shared in line with data protection requirements.

Data processed for tracing purposes includes:

- Name
- Email
- Phone number
- Site visiting
- Arrival date time
- Departure date time
- Who they are visiting
- Reason for visit

Data processed for the purpose of notifying a positive test includes:

- Name
- Covid test result and evidence
- Location and dates of employment, study or accommodation on UAL premises
- Course or department details
Data Protection principles

Accountability principle – the Information Governance team have directly advised the Health & Safety IAO, project lead and acting project lead about privacy risks and legislative requirements, in line with UAL’s Information Governance policies. The resulting agreed process is described in this document.

Principle (a): lawfulness, fairness and transparency - we rely on the primary lawful basis of GDPR Article 6 (1)(e) - processing is necessary in the Public Interest. The legal basis we rely on to process special category data is GDPR Article 9 (2) b) - the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment, the provisions of the Health and Safety at Work Act 1974. The Schedule 1 condition of processing is paragraph 1, “Employment, social security and social protection”. Processing information is described in privacy notices both at the point where tracing data and notification of a positive test result are received. Rights information is available to all at www.arts.ac.uk/privacy-information.

Principle (b): purpose limitation - We are required to collect staff, student, contractor and visitor information to participate in the Public Health England COVID-19 ‘Test and Trace’ scheme. The process has been developed in order to support this purpose only and is described in the relevant privacy notices.

Principle (c): data minimisation - When contacting staff and students under these arrangements, the University will not reveal the identity of individuals who report a positive test result to anyone else within the University including the close contacts (unless sharing is necessary because of our duty of care requirements). Data will only be shared with Public Health England and only if we are asked to do so.

Principle (d): accuracy – wherever possible, data will be collected directly from the individuals concerned. Evidence of a positive test result will also be requested. Any errors can be rectified through the DPO, as indicated at www.arts.ac.uk/privacy-information as linked to from the privacy notices.

Principle (e): storage limitation –
- Special Category data will be deleted after 21 days, as advised by PHE.
- Tracing data will be stored for 28 days if solely required for this purpose, otherwise in line with its normal retention period as described in UAL’s Records Retention Schedule on Canvas. Data retained for longer than 28 days will not be used for the tracing purpose after 28 days.

Principle (f): integrity and confidentiality (security) – all data will be processed on existing UAL-managed platforms. Access to special category data will be restricted to nominated individuals managing a single dedicated inbox. Individuals handling the inbox data will have completed online GDPR training. This data will be kept separate from data used for tracing purposes, so that the reason for a search of location data will not be identifiable.
Communication

Self-isolation requirements and the contact tracing process for students, staff, and contractor, Students’ Union and other third-party colleagues and visitors, will be communicated as part of the health and safety briefing of Big Welcome, Big Welcome back, and return to on-site working. They will be included in information on-line for students, staff and line managers, and available at reception desks for contractors and other third-party colleagues and visitors.

Students and staff should be aware of tracing scams and are advised not to share personal and/or financial information.

Enhanced cleaning

Procedures have been developed by Estates colleagues for enhanced cleaning of UAL sites including deep cleaning of areas where deemed necessary.