



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

Draft V.15

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### 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 who have been in possible close contact with someone who has a positive diagnosis for the virus. Through UAL, NHS Test and Trace will notify those people of the need to self-isolate but will not reveal the identity of the person who has tested positive.

Staff and students will be asked to report to the university 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 will be 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. **Self-isolation** and **testing** 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 has put in place extensive social distancing and COVID-safe measures to reduce the likelihood of the virus spreading, and this document is 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.

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

Anyone with symptoms is eligible for a coronavirus test. If anyone develops one of the three main coronavirus symptoms, they should seek a COVID-19 test as soon as possible, and must self-isolate until they get a result. This means not leaving their accommodation for any reason other than getting a test. People living in the same household must also self-isolate.

Anyone with suspected COVID-19 symptoms MUST:

- self-isolate for at least 10 days from the date they first had symptoms
- [contact NHS for testing](#)

### Symptoms

The three main coronavirus (COVID-19) symptoms are:

- a high temperature – this means feeling hot to touch on the chest or back (temperature does not need to be measured)
- a new, continuous cough – this means coughing frequently for more than an hour, or 3 or more coughing episodes in 24 hours (if someone usually has a cough, it may be worse than usual)
- a loss or change to sense of smell or taste – this means not being able to smell or taste anything, or things smell or taste different to normal.
- It is important to only get a test if you have coronavirus symptoms or have been asked to get tested. This will help make sure people who need a test can get one. Asymptomatic testing is provided only in specific circumstances and on the recommendation of public health experts, for instance in areas of high prevalence or high risk or where there is a local outbreak. People without symptoms should not order tests except where instructed to do so through being enrolled in a pilot scheme or at the direct request of their local public health team or director of public health.

Most people with coronavirus have at least one of these symptoms. More information can be found here: <https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms/>

### How to self-isolate

Anyone who has symptoms – or who lives in the same household as someone with 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 to prevent transmitting the virus to other people. The person who has tested positive must continue to self-isolate for 10 days from when they first developed symptoms – or longer if they still have a high temperature. However, if coronavirus symptoms get worse it is important that they seek medical attention. Other members of their household must continue to self-isolate for 14 days from symptom onset.

There is guidance at <https://www.nhs.uk/conditions/coronavirus-covid-19/self-isolation-and-treatment/what-to-do-if-symptoms-get-worse/>

**Do not:**

- go to the university or public places
- go on public transport or use taxis
- go out to get food and medicine – order it on-line or by phone, or ask someone to bring it to your home
- have visitors in your home, including friends and family – except for people providing essential care
- go out to exercise – exercise in your home or in your garden, if you have one

## Testing

Testing is **free of charge** for everyone and tests are arranged through the NHS; staff and students must contact the NHS immediately if they have symptoms so they can be tested as quickly as possible. 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 requirements for anyone who has been in close contact with someone who has tested positive for coronavirus (COVID-19)

Anyone who may have been in close contact with someone who has tested positive for the virus, may be contacted by the NHS Test and Trace team and be advised to self-isolate for at least 14 days from the date of last contact with someone displaying symptoms. If a person has not been contacted by the NHS or UAL it means they have been deemed to have not been in close contact and therefore do not need to self-isolate and should attend work or studies as normal.

However, should someone subsequently begin to develop symptoms of the virus themselves, they should get [tested](#) and advise the University if they test positive as outlined in the procedure above. If they do test positive, they will need to self-isolate for at least a further 10 days from the date they first had symptoms.

## Definition of 'close contact'

Close contact is defined by the NHS as:

A 'close' contact is defined as someone who:

- spends significant time in the same household as someone who has tested positive for coronavirus (COVID-19)
- is a sexual partner of someone who has tested positive
- has been within 2 metres of someone who has tested positive for more than 15 minutes
- has been within 1 metre of someone who has tested positive for more than one minute
- has had face-to-face contact (within one metre) of someone who has tested positive, including being coughed on
- has had skin-to-skin physical contact with someone who has tested positive
- has travelled in a small vehicle with someone who has tested positive or sat near someone who has tested positive in a large vehicle or plane.

Further information is available [in the guidance for people who have had close contact with someone who has coronavirus.](#)

It is important that those living in residential settings (halls of residence or houses of multiple occupation) understand when their household should self-isolate.

## 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, and their close contacts, will be contacted

separately by NHS Test and Trace service. This contact made be made via the University on behalf of NHS Test and Trace

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.

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.

## 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](http://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](http://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 must not provide personal and financial information.

## Enhanced cleaning

Procedures are being developed by Estates colleagues for enhanced cleaning of UAL sites including deep cleaning of areas used by a person who has tested positive.