

Privacy Notice

Name of Process: Health Surveillance for employees and students

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation (“the legislation”), that is, the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR.

*Data Controller	Edinburgh Napier University
*Purposes for collection/processing	<p>The University is required by Health and Safety legislation to operate a Health Surveillance scheme for employees who may be exposed to health risks due to the nature of their role</p> <p>The University carries out a number of activities that, were they not suitably controlled, could pose a risk to the health of individuals involved in those activities. Controls are normally identified via risk assessment and are monitored accordingly. Some activities can have a higher than normal level of residual risk, as every person reacts differently to exposure, and some scenarios may need to be monitored. Therefore, where there is a higher than normal level of residual risk to health and where there is a credible health assessment method for identifying early signs of potential harm, health surveillance or monitoring may be implemented.</p> <p>Please see the HSE website for further information: Health surveillance - Overview (hse.gov.uk)</p>
*Legal basis	<p>Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject [employee] is party.</p> <p>Article 6(1)(c): processing is necessary for compliance with a legal obligation [Health and Safety legislation] to which the controller is subject</p> <p>Special Category Data: Article 9(2)(h): Processing is necessary for the purposes of preventative or occupational medicine, assessment of the working capacity of the employee, medical diagnosis, etc.</p> <p>The University will only collect and share the information necessary. This is proportionate to the aim pursued.</p>

	<p>Health surveillance is undertaken as a measure to safeguard the health of colleagues, as required by the relevant legislation. Secure organisational and technical measures are in place for sharing and processing the data e.g. online secure portal for sharing and use of HRConnect internally.</p>
Whose information is being collected	Staff and specific students, as required e.g. PhD students.
What type/classes/fields of information are collected	Name, address, contact details, date of birth, tests to be undertaken will be provided to the University's Occupational Health (OH) provider. The OH provider will provide test result information back to the University.
Who is the information being collected from	There is a process to identify if an employee is eligible to be entered into the Health Surveillance programme and this is carried out by the Dean/ Director. Personal data is collected from HRConnect for this processing.
How is the information being collected	Staff members role is identified as requiring Health Surveillance. On an annual basis this is reconfirmed by the Deans and Directors. Staff members will be advised by appropriate staff within their Service Area / School that the Health Surveillance programme will commence and that their personal details will be provided to the University's Occupational Health provider for the purposes of undertaking the Health Surveillance exercise. Colleagues will then be contacted directly by the University's Occupational Health provider.
*Who is personal data shared with internally and externally	Line Manager and appropriate colleagues who will provide communications in relation to the process, HR and Occupational Health provider.
How secure is the information	<p>For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies and redundant hardware disposal. Information on these servers is backed up regularly. The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data.</p> <p>The University makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that</p>

	<p>these services have appropriate organisational and technical measures to comply with data protection legislation.</p> <p>The Occupational Health provider has been subject to the appropriate checks to ensure that they employ systems which are secure and have been subject to data protection checks through the procurement process.</p>
Who keeps the information updated	<p>HR update employee/individual's records as notified by individuals and as updated information is generated about processes. Employees and students have access to their personal data via HRConnect and SITS eVision student portal to update their personal data as necessary.</p> <p>Health Surveillance information will be kept on your personnel file for the duration of your contract with the University, plus 7 years from the termination of your contract.</p> <p>The OH provider that the University has a contract with will keep your information from the termination of your employment plus 40 years, as a legal requirement.</p>
*How long is the information kept for	Information is kept line with the University records retention schedule:
*Will the data be used for any automated decision making	No
*Is information transferred to a third country outside the UK?	No
<p>*This information is provided to supplement the University's main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data. You can access all the University's privacy notices using the following URL: https://www.napier.ac.uk/privacy-policy</p> <p>*You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: https://www.napier.ac.uk/privacy-policy</p>	