



Royal Conservatoire
of Scotland

PRIVACY NOTICE:

Test and Protect

Version 1.7, August 2021

PRIVACY NOTICE: TEST AND PROTECT

The Royal Conservatoire of Scotland (RCS) is providing you with this information in order to comply with all relevant data protection legislation and to ensure that you are fully informed about how we collect and use your personal information, as we comply with the [Scottish Government Test and Protect](#) guidance.

WHO WE ARE

The Royal Conservatoire of Scotland is a Higher Education Institution (HEI) and a performing arts venue based in Scotland. The Royal Conservatoire of Scotland is the 'Controller' and is responsible for looking after the personal information that you provide.

WHY WE COLLECT YOUR PERSONAL INFORMATION

The purpose for which we are processing your personal information is to assist with the NHS Scotland's Test and Protect strategy. For further information on the NHS Scotland Test and Protect strategy please visit the [NHS website](#).

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information related to:

- 1) Your physical attendance on campus, which will include contact details. We will collect personal information directly from you or from existing internal secure systems e.g. ASIMUT (the timetabling system) and Kaba (the door entry system)
- 2) RCS students who plan to travel from their term-time residence and move household.

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU

Physical Attendance on Campus:

For all campus attendance we will, along with the date and time of your arrival and departure, collect the following personal information, either prior to or upon entry of, an RCS campus:

- Your name
- Contact telephone number

If you do not have a telephone number, you have the option to provide: A postal address or an email address. The personal information being collected does not include special category (sensitive) data.

Student Address:

For those RCS students who opt to move from their term-time residence and move household during academic breaks we may collect necessary personal information such as your name and contact details, including term-time and alternative address.

OUR LAWFUL BASIS FOR COLLECTING THIS PERSONAL INFORMATION

The lawful basis for collecting this information is legal obligation, that being; The Health and Safety at Work etc. Act 1974, and therein, the:

- General duties of employers to their employees; and
- General duties of employers and self-employed to persons other than their employees.
- For the performance of a task carried out in the public interest
- For the purposes of the legitimate interests pursued by the RCS

HOW YOUR PERSONAL INFORMATION IS BEING USED

The RCS will use this recorded personal information in support NHS Scotland's Test and Protect service and the UK Government testing programme. Your personal information will only in the event that the RCS is contacted by the NHS to support the test & protect programme, and if a number of new cases are tracked back to the RCS premises. We may also use your data in order to support you during academic breaks if you choose to remain in term-time accommodation.

IF YOU DO NOT PROVIDE US WITH PERSONAL INFORMATION

If you do not provide us with the personal information we ask for, we may refuse you entry to the RCS campus's.

PROTECTING YOUR PERSONAL INFORMATION

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used, accessed, altered or disclosed in an unauthorised way. We have in place procedures to deal with any security breaches and we will notify you and the regulator of any suspected breach where we are legally required to do so. Further information can be found in our [Data Protection Policy](#). This process does not involve your personal information being sent outside of the European Union.

DATA SHARING

Your personal information will, or may, be shared with NHS Scotland in relation the Test and Protect Strategy. You can read the Scottish Government's [official guidance](#) and their [privacy notice](#).

NHS tracers may contact the RCS if they are aware an individual has visited the RCS campus's. NHS tracers may then contact you to make you aware of any actions you should take to protect your own health, and the health of others.

This process does not involve your personal information being sent outside of the European Union.

HOW LONG WILL WE HOLD YOUR PERSONAL INFORMATION

Your personal data related to physical attendance on campus will be held by us for at least 3 weeks (21 days) for Test & Protect purposes. The RCS Record Retention Schedule can be found on the RCS website in our [Freedom of Information](#)

[Publication Scheme](#). All personal data will be held and disposed of in a safe and secure manner.

YOUR RIGHTS

You have a range of rights under data protection legislation. You have the right to:

- **Be informed:** about the collection and use of your data
- **Access:** your personal information (commonly known as a “subject access request”)
- **Rectification:** if information we hold about you is wrong, please ask us to correct it
- **Restrict Processing:** you have the right to ask us to restrict or suppress the processing of your information

The following rights apply only in certain circumstances:

- **Object:** to our processing where we rely on a legitimate interest (or those of a third party) and you object
- **Erasure:** you can ask us to delete information about you
- **Data portability:** allows you to move, copy or transfer your data easily from one IT environment to another

Please note that you also have rights regarding automated decision making and profiling, however, RCS does not make any use of any automated decision making or profiling tools. If this changes, we will let you know.

SUBJECT ACCESS REQUESTS

Any staff member, student or RCS visitor can exercise their right of access, known as a Subject Access Request, either verbally or in writing, dataprotection@rcs.ac.uk. You will receive a response from the RCS within 30 days.

CONTACT US

Please get in touch with us if you have any questions about any aspect of this Privacy Notice, and in particular if you would like to exercise any of your rights as outlined above. We can be contacted at:

Data Protection Team

A: Royal Conservatoire of Scotland, 100 Renfrew Street, Glasgow, G2 3DB

T: 01412708269

E: dataprotection@rcs.ac.uk

If you have any issues about this notice or the way the RCS has handled your personal information, please contact our Data Protection Officer.

E: dpo@rcs.ac.uk

COMPLAINTS

If you are dissatisfied with the response from the RCS you have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data:

Information Commissioner's Office

A: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

E: casework@ico.org.uk

T: 0303 123 1113