



## Weekly asymptomatic screening programme for COVID-19 at the University of Cambridge

From the start of Michaelmas Term, all undergraduate and postgraduate students at the University of Cambridge living in College accommodation will be offered a weekly test for infection with SARS-CoV-2, the virus which causes COVID-19, even if they show no symptoms.

Around half of people infected with SARS-CoV-2 develop *symptoms*, such as a high temperature, cough, or a loss or change in their sense of smell or taste. Others show no symptoms, and are unaware that they are infected at all (they are *asymptomatic*). Among university students, the rate of asymptomatic infection may be even higher.

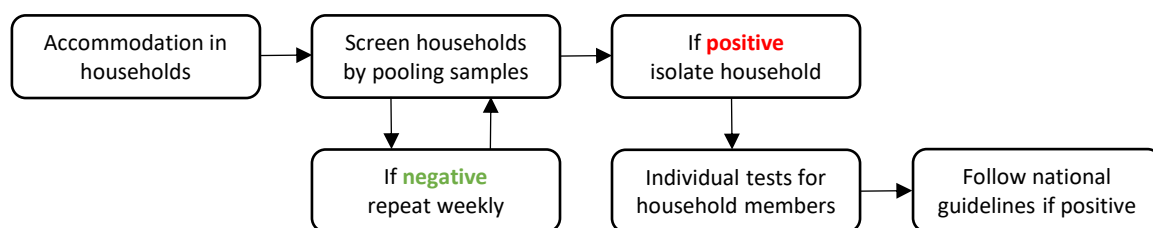
We know that people with SARS-CoV-2 infection but no symptoms can still spread the virus to others. The aim of the screening programme is therefore to identify students with asymptomatic infection, so they can avoid infecting more students or members of the Cambridge community.

The test will be self-administered, using a swab to take a sample from the nose and throat. Because we have a limited number of tests available, samples from several students will be tested together in *pools*. Pooling tests will allow us to make the best use of our testing capacity.

In general, samples will be pooled by *household*. In College accommodation, a household is a unit where students share communal facilities, such as a bathroom or kitchen. Some smaller households will be asked to join neighbouring households in a single testing pool, while some larger households will be split into smaller testing pools.

Samples will be tested at the Cambridge COVID-19 testing facility on the Cambridge Biomedical Campus. If a pooled screening test is positive, the household will be informed within 24 hours, and students in the household will be offered individual tests to confirm the positive result.

Households with positive pooled screening tests will be asked to follow University isolation recommendations until the results of individual tests are known. Individual students with confirmed SARS-CoV-2 infection and their household and contacts will then be supported in following national guidance on isolation.

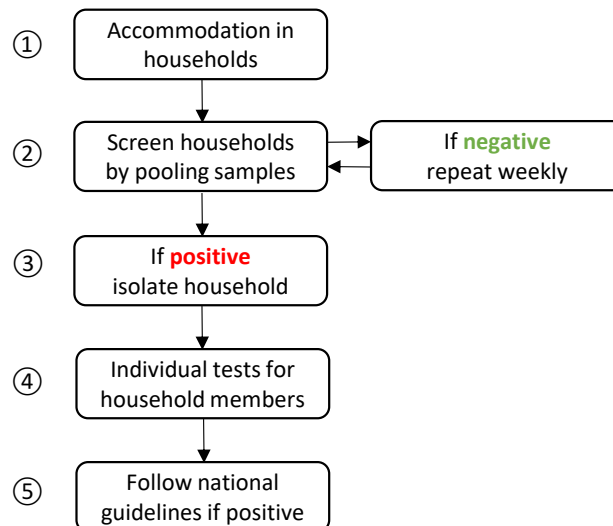


Participation in the programme will be voluntary, but we encourage everyone to take part. We anticipate that the majority of students will do so, to help keep themselves, their friends and colleagues, and the wider community safe.

Further details and answers to FAQs on the screening programme will be made available on the *Stay Safe Cambridge Uni* website as they become available: <https://www.cam.ac.uk/coronavirus/stay-safe-cambridge-uni>



## Flow chart for the weekly asymptomatic screening programme for COVID-19



1. Students living in accommodation that includes high-contact shared facilities such as a bathroom, toilet or kitchen area are generally considered by Colleges to share the same *College household*. These shared areas provide opportunities for SARS-CoV-2 transmission, through contaminated surfaces or close contact with other household members. Like other households, College households therefore represent units of social distancing (and, if necessary, quarantine) in the University of Cambridge context.
2. The screening test is a self-administered swab from the nose and throat. Because we have a limited number of tests available, samples from several students will be tested together in *testing pools*. In general, testing pools will correspond to College households. Some smaller College households will be asked to join neighbouring College households in a single testing pool, while some larger College households will be split into smaller testing pools. To pool samples at the time they are collected, all the students in a given testing pool will place their swabs in the same sample tube. These pooled samples will be tested by PCR for SARS-CoV-2 at the Cambridge COVID-19 testing facility on the Cambridge Biomedical Campus.
3. If a pooled screening test is positive, students from the affected household or households will be informed within 24 hours. To prevent the onward transmission of COVID-19, they will be asked to follow University guidelines on household isolation, supported by their College.
4. Students from the affected household will be offered individual tests, to confirm the positive screening test result. This test will also be a self-administered swab from the nose and throat, but conducted under supervision at one of the University's established testing pods.
5. When an individual test is positive, a final plan for household isolation will be decided, in accordance with UK national guidelines. These test results will also trigger *NHS Test and Trace*.



# Pooled sample collection for the weekly asymptomatic screening programme for COVID-19

*Taking your sample may cause minor discomfort for a few seconds, but it shouldn't hurt.  
Thank you for helping us keep Cambridge safe!*

**Step 1** – Your *pool lead* should ensure that everyone in your *testing pool* is ready, and that everything is in place to start swabbing. The sample tube should be located in a shared area, such as a kitchen or bathroom. Remember to maintain social distancing throughout!



**Step 2** – Your sample should be taken in your own room or bathroom, by yourself, with the door closed.

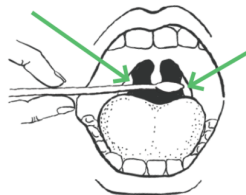
**Step 3** – Gently blow your nose and cough into a tissue. Throw the tissue away.

**Step 4** – Wash your hands.



**Step 5** – Remove the swab from its wrapper.

**Step 6** – Open your mouth wide and gently rub the fabric tip of the swab over both tonsils at the back of your throat, rotating as you do so. Try not to touch your tongue, teeth, cheeks, gums, or any other surfaces with the tip of the swab.



**Step 7** – Insert the same end of the same swab gently into your nostril about 2.5cm (1 inch), or until you feel some resistance. Rotate the swab and slowly remove it.



**Step 8** – Return the swab to the inside of its wrapper, taking care not to touch it on anything else.



**Step 9** – Wash your hands.

**Step 10** – Carry the swab into the room with the sample tube, ensuring that it remains inside its wrapper.

**Step 11** – Remove the swab from its wrapper, snap off the unused end, and place the end with the fabric tip in the sample tube. Make sure the fabric tip is facing down. Dispose of the unused end and the wrapper in a waste bin, in the same way you would dispose of dental floss. You and the other members of your *testing pool* should take it in turns, until all your swabs are placed in the same sample tube.



**Step 12** – Wash your hands.

**Step 13** – Once you and the other members of your testing pool have placed all your swabs in the sample tube, your pool lead should securely screw on the lid and double-bag the sample, then wash their hands.

**Step 14** – Take the bagged sample to your College collection point



## Frequently asked questions (FAQs)

### Getting involved

**1. Why should I take part?**

The aim of this screening programme is to identify students with asymptomatic SARS-CoV-2 infection, so they can avoid infecting other people. By participating in the programme, students will therefore help reduce the risk of infection for other students, staff and the wider Cambridge community. If the University and Colleges are to remain open, it is essential to control the transmission of COVID-19. Everyone who wishes to attend University and College therefore stands to benefit.

**2. Why are we being offered asymptomatic testing when the general public are not?**

Students in universities have a high risk of transmitting COVID-19, and many outbreaks have been reported. Compared with other members of the population, young adults have a higher chance of asymptomatic infection. Public health experts have therefore called for asymptomatic screening in high risk settings, such as universities. As well as protecting students directly, controlling transmission between students will help prevent onward transmission to staff and the wider Cambridge community.

**3. Which students will be involved in the programme?**

The risk of COVID-19 transmission is expected to be highest in College accommodation, where the density of students and potential for interactions are greatest. All undergraduates and postgraduates resident in College accommodation will therefore be eligible to take part. Our testing capacity (approx. 2,000 tests every week, subject to national testing needs), combined with the number of students that can be tested within each pool (maximum of 10, average of 8), will allow approx. 16,000 students to be screened every week. This matches the number of students in College accommodation. Whilst desirable, there is therefore insufficient testing capacity to include students who “live out”. Testing capacity and eligibility will be kept under review, and all students and staff will be able to access a test for COVID-19 if they are [symptomatic](#).

**4. Can students from any College take part?**

Yes, all Colleges will be participating in the programme, together with houses of the Cambridge Theological Federation.

**5. How many weeks will asymptomatic pooled testing be offered for?**

The programme will run throughout full term, subject to testing capacity. For Michaelmas Term 2020, this will span 9 weeks, commencing in the week of 5<sup>th</sup> October, and finishing in the week of 30<sup>th</sup> November. The first week of testing will operate at reduced scale, to test our systems, and establish the prevalence of asymptomatic SARS-CoV-2 infection in students returning to Cambridge.

**6. Would you recommend that I participate if I have already had COVID-19?**

We do not know how long immunity to COVID-19 lasts, or the risk of asymptomatic re-infection. We are aware, however, that some individuals with COVID-19 continue to shed SARS-CoV-2 virus for several weeks after their illness, without being infectious to others.

Students who have already had COVID-19 will therefore be eligible to participate in the programme, but only if 8 weeks have passed since their infection.

## Consent and privacy

### **7. Will I be penalised if I don't take a swab?**

Absolutely not, swabbing is entirely voluntary. It is grounded upon students' willingness to keep themselves and their communities safe. We therefore hope that students will encourage each other to participate in a positive and compassionate way. Students who decline to participate will still be informed by their College if COVID-19 is detected in their household, and expected to follow guidelines on isolation. In line with the GDPR (data protection) and other laws, and with appropriate data minimisation and safeguards, personal data held by the University and Colleges about participants and non-participants may be used to support programme evaluation and COVID-19 research (for example, to evaluate rates of participation, infection and infection detection).

### **8. What personal details will I be asked for when I sign up?**

The minimum possible personal data will be used by the University to facilitate the running of the programme. Most of this data will already be held by the University, but participating students will be asked to provide an up-to-date mobile telephone number that can be used to send pooled screening test results via text message. Limited personal information (name, date of birth, College address, contact details) will be used to register participating students with Cambridge University Hospitals, to allow access to individual tests. To facilitate this, each student will be registered on Epic (the hospital's secure electronic medical record system, which is used to book all individual tests in the University's COVID-19 testing pathways) and MyChart (the patient-facing way to view to Epic).

### **9. How will my personal data be used and protected?**

Personal data will be processed fairly, lawfully and transparently, and in accordance with the data protection principles in the General Data Protection Regulation (GDPR). The University and Colleges have responsibility to ensure this. Primarily, personal data will be processed because it is necessary for the protection of public health and for the University and Colleges to provide educational services safely for students, other members of the University and other people in Cambridge. Other organisations involved in some stages of the programme include Cambridge University Hospitals (laboratory tests, reporting results, medical advice), a laboratory service provider such as Astra Zeneca (laboratory tests using only pseudonymised data), Public Health England (surveillance) and the East of England Health Protection Teams and Local Authority Public Health Team (contact tracing, public health advice and outbreak management). These organisations are also obliged to process data fairly, lawfully and transparently and in accordance with the data protection principles in the GDPR. All information systems will have a high degree of security, proportionate to the sensitivity of the information. In order to learn from and improve the testing programmes, personal data (minimised and pseudonymised) may be processed for evaluation and research in line with the GDPR. Further details on how personal data will be used as part of this programme is included in the [Privacy Notice](#).

### **10. What is the purpose of the Consent Form?**

Voluntary participation in the programme is valued and appreciated! The consent form is a way to record the students who agree to participate, and to check that they understand the

implications of participating. It also provides a mechanism to opt into optional parts of the programme.

**11. What happens if I don't sign the Consent Form?**

Students who do not consent to participate in the programme will not be included in testing pools, nor sent weekly swabs. They will still be informed by their College if COVID-19 is detected in their household, and expected to follow guidelines on isolation. Since the programme has been developed to protect public health, minimal personal data may be used without individual consent, subject to appropriate safeguards and provided it is necessary and appropriate. Further details on how personal data will be used as part of this programme is included in the [Privacy Notice](#).

**12. Will information that I provide as part of this programme be used for research?**

Your information may sometimes be used for purposes that are not directly related to your health and care. Wherever possible, this will be done using information that does not identify you. These include: planning of services or actions in response to COVID-19; understanding the transmission of COVID-19 in a university setting; other research into COVID-19. There are innovations in this programme that are likely to be of broad interest to individuals, institutions and policymakers developing screening programmes for COVID-19. We therefore aim to present the protocols and outcomes of this programme at conferences and publish in peer-reviewed journals. Results are normally presented in terms of groups of individuals. If any data are presented or published, the data will be fully anonymous, without any means of identifying the individuals involved. Further information is included in the [Privacy Notice](#).

**13. Will I be contacted by researchers as part of this programme?**

You may be re-contacted by researchers from the University of Cambridge and other institutions about studies related to this programme e.g. studies about COVID-19, screening programmes, other infectious diseases or public health. You have no obligation to take part in these studies. If you do agree to participate, you will assist your institution in furthering its world-renowned knowledge and understanding in these scientific fields of study. Whatever your decision, it will not affect your participation in this programme.

## Households and testing pools

**14. What is the difference between a "household" and a "testing pool"?**

"College households" are groups of students with shared facilities (such as kitchens and bathrooms) in College residential accommodation. "Testing pools" are groups of students who pool their swabs together in the asymptomatic screening programme. Wherever possible, testing pools will correspond with College households. In practice, some smaller households will need to "buddy-up", and some larger households (>10 people) will need to include 2 testing pools.

**15. Why do tests need to be pooled?**

Our available testing capacity is approx. 2,000 tests every week. There are expected to be approx. 16,000 students resident in College accommodation during Michaelmas Term. To test all students on a weekly basis, pooling of tests is therefore necessary.

**16. How will pooled sample collection actually work?**

To pool tests at the time swabs are taken, students in a testing pool will simply place their individual nose/throat swabs in a single sample tube. This is described in detail in the swabbing protocol.

**17. What if I share a bathrooms or kitchen with >10 people?**

If households are larger than 10 people, they will be split into two testing pools. If either one of these testing pools is positive, the whole household will need to isolate.

**18. Can I join another household if I forget to swab with mine?**

No, to allow us to run the programme safely and efficiently, it is essential that you only participate in your allocated testing pool.

**19. What if we need to compromise on a time for pooled testing that not everyone can attend?**

We would strongly recommend discussion among your testing pool in advance of the swabbing day, to find the most suitable time for everyone. For many households, that will be first thing in the morning, prior to any teaching commitments or other activities. Remember that all students resident in College will be swabbed on the same day. In exceptional circumstances, if a time cannot be agreed, we recommend that as many pool members as possible contribute.

**20. I'm not close to anyone I share a kitchen or bathroom with. Will I be able to change my household?**

The Colleges have responsibility for student accommodation and allocations to households and testing pools. They should be the first point of contact if you wish to change your accommodation.

**21. Does the whole household have to participate for us to do it?**

No, swabbing is voluntary, and as many or as few people within a household can participate as they wish.

**22. What if no-one else in my household wants to participate in the programme?**

Everyone who is eligible to participate and wishes to do so will be included in a testing pool.

**23. I don't know who is in my household yet, is that an issue?**

No, Colleges will organise households and their associated testing pools before the start of term.

**24. Can we choose the day of swabbing?**

No, to organise test kit delivery and collection, as well as ensure that the tests are evenly spread across the week for the testing facility, each College will be allocated a particular day (Monday to Thursday) on which swabbing will take place. This will be the same day every week.

**25. Will pooled sample collection itself carry a risk of SARS-CoV-2 transmission?**

No, the protocol for pooled sample collection has been specifically designed by Infectious Diseases clinicians to ensure that any risk of transmission will be near-zero, and certainly much lower than the risk of contracting SARS-CoV-2 infection as part of general student life.



## Results and reporting

### **26. How will we be notified of positive results?**

Members of a positive testing pool will be notified by text message the next morning. This will be followed by an email with details of an appointment for individual confirmatory testing later that day. Results of individual tests should be available the day after that. For example, if screening is on Monday, the results will be available on Tuesday morning. If positive, an individual test will be offered on Tuesday, and the result will be available on Wednesday. In exceptional circumstances, it is possible that test results, or appointments for individual testing, will be delayed. We will make every effort to minimise the chance of this happening.

### **27. What happens if a testing pool is positive and the pool corresponds with a single College household?**

Household isolation will begin immediately. Each student who has consented to provide swabs in the testing pool/household will be offered an individual test via the existing University pod. If/when individual household members are confirmed to be positive, a final plan for duration of household isolation will be determined in accordance with national guidelines. Individual test results will be reported to Public Health England (PHE) and NHS Test and Trace.

### **28. What happens if a testing pool is positive from a large College household including more than one testing pool?**

As above, but household isolation will begin immediately for all students within the College household (not just household members contributing to the positive testing pool). Only students who have participated in the swabbing of the positive testing pool will be offered an individual test.

### **29. What happens if a testing pool is positive and it includes students from more than one College household?**

As above, but household quarantine will begin immediately for all households included in the testing pool. Every student in the testing pool will be offered an individual test. If/when individual household members are confirmed to be positive, a final plan for duration of household isolation will be determined in accordance with national guidelines. This will be limited to the affected household, not the entire testing pool.

### **30. If I do not participate but my household tests positive, am I expected to self-isolate?**

Yes, if a member or members of a household test positive for COVID-19 as part of this programme, all members of the household should isolate, not just participating students. This is because, whether or not they participate in the programme, all students in the household will be at risk of infection.

### **31. If I test positive, will the rest of my household be told I have it?**

The rest of the household will be informed that someone in the household has confirmed COVID-19. However, we will not reveal the identity/identities of the individual(s) that have tested positive.

### **32. If I test positive, who else will be informed?**

The results of pooled screening tests and positive individual tests will be made available to a small team within the University and relevant College who have been identified as COVID-19 leads. This is to ensure that all households that are required to isolate are provided with



appropriate support, and that any necessary infection control measures are put in place in the College and University departments. Individual test results will be reported to Public Health England (PHE) and NHS Test and Trace. Further information is included in the [Privacy Notice](#).

**33. What is the risk of false positive result?**

We estimate that the risk of a false positive pooled screening test will be less than 1/1,000. In practice, positive pooled screening tests will always be followed by individual confirmatory tests, and individual students and their households will only be asked to isolate for an extended period if a positive pooled screening test is followed by a positive individual confirmatory test. We estimate that the risk of a false positive pooled screening test being followed by a false positive individual confirmatory tests will be less than 1/1,000,000.

## Testing

**34. Where will my samples be tested?**

All samples will be processed by the Cambridge COVID-19 testing facility at the University's Anne McLaren Building on the Cambridge Biomedical Campus, which is part of the UK Lighthouse Labs network. Further information is included in the [Privacy Notice](#).

**35. Will the programme impact on national testing capacity?**

No. The University has access to a limited number of tests for the evaluation of new approaches to maximise the value of testing, but NHS Test and Trace samples always take priority. Whilst every effort will be made to ensure that the programme proceeds as planned, there are therefore exceptional circumstances in which it may need to be suspended, or reduced in extent. In fact, a very important aim of the programme is to demonstrate how testing samples in pools can be used to increase effective testing capacity.

**36. What happens to my sample after it has been tested?**

Samples will be processed and disposed of in the testing facility in exactly the same manner as "normal" NHS Test and Trace samples. Some of these samples may be used to optimise the tests that we use to detect SARS-CoV-2.

**37. Will my DNA be tested as part of this programme?**

No, human DNA will not be extracted, tested or stored as part of this programme.

**38. If I get a positive result, will the virus that I have be stored?**

Yes, this is likely as part of a national surveillance programme that is attempting to study all SARS-CoV-2 viruses identified in the UK throughout the pandemic called COG-UK. This is a major public health programme, supported by the UK government. More information can be found [here](#).

## General

**39. Is it inevitable that I will test positive at some point?**

No, this programme, in conjunction with other measures introduced by the University and Colleges, aims to substantially reduce the risk of transmission.

**40. Is this a service or a research study?**

The primary aim of this programme is to identify students with asymptomatic SARS-CoV-2 infection, so they can avoid infecting other people. In addition, evaluation of the programme will help inform the feasibility of similar programmes in different settings, such as other universities, as well as providing insights into the transmission and natural history of SARS-CoV-2 infection. We have therefore applied to the Cambridge Human Biology Research Ethics Committee for ethical approval of these research aspects of the programme.

**41. Where can I find out more information?**

Information about the programme can be found on the University website, here:

<https://www.cam.ac.uk/coronavirus/stay-safe-cambridge-uni/get-tested>

Further information is included in the [Privacy Notice](#). Additional information will be provided by your Colleges. If you have any questions that remain unanswered, please contact us at [asymptomatic-queries@admin.cam.ac.uk](mailto:asymptomatic-queries@admin.cam.ac.uk).

**Thank you for helping us keep Cambridge safe!**



# Privacy Notice for the University of Cambridge Asymptomatic COVID-19 Screening Programme.

[Version 2. Issued. 25<sup>th</sup> September 2020. Last revised 25<sup>th</sup> September 2020]

A general Privacy Notice for students can be found here: [How we use your personal information \(for students\)](#).

This Privacy Notice supplements the general Privacy Notice. It summarises how your personal data will be collected, handled and shared as part of the University of Cambridge Asymptomatic COVID-19 Screening Programme, whether or not you consent to participate in the swabbing process each week. Further information about the University of Cambridge Asymptomatic COVID-19 Screening Programme can be found in the [Student Information Sheet](#).

In this document, GDPR refers to the [European General Data Protection Regulation](#). The DPA refers to the UK's [Data Protection Act 2018](#). Cambridge University Hospitals NHS Foundation Trust is also known as Addenbrooke's Hospital.

## Part A. Data processing relevant to ALL students

- **Data controllers and data processors:** The principal data controller for this programme is the University of Cambridge. The Colleges associated with the University of Cambridge will also be data controllers in the ways explained below. Data processors operating under the instruction of the data controllers include contracted IT suppliers.
- **Type of personal data:** To administer this programme, the University and Colleges will process basic personal data about all students – particularly those living in College accommodation – including your name, university email address, student identifier, date of birth, course of study, and College residence. You have already given us this information. Using this data for this programme is compatible with the original reasons we asked you for it. As described in the general Privacy Notice, those purposes included to deliver and administer a high-quality education, to deliver services to you, to communicate effectively with you, to conduct research for public interest purposes, and to support student welfare. For this programme, we will also collect and process information about the College 'household' to which you belong. This information is generated by your College to assist with COVID-19 outbreak management. It is possible that we will indirectly come into possession of information about your COVID-19 risk status (i.e. a rough probability) without you undergoing a swab, for example if you have been in close contact with a household or individual who tests positive.

- **Purpose for processing:** The purpose of this programme, and the personal data processing which it entails, is to protect the health of students and their close contacts from COVID-19, for example by reducing the risk of virus transmission, preventing and managing COVID-19 outbreaks in the University and Colleges, generating good evidence for targeted advice to members of the University to self-isolate (i.e. advice that is not too narrow and not too broad), supporting local and national public health authorities, and conducting research to improve public health, infectious disease and COVID-19 science. Positive pooled test results will trigger requests from the University and Colleges that students in the household (including those who did not swab) begin self-isolation. It may also trigger obligations to follow any binding national, University or College policies on self-isolation that apply in your particular situation (see e.g. [University's advice pages](#)). The purpose of follow-up individual tests is to confirm that one or more people in the household are COVID-19 positive, and to help trace their recent close contacts.
- **Lawful basis for processing:** Under the GDPR, the lawful basis we rely on for processing your personal data in this programme is to perform public tasks, and tasks in the public interest. These include providing higher education safely, supporting public health COVID-19 surveillance and management, and supporting scientific research into COVID-19. We also rely on the lawful basis of meeting the University's, Colleges' and wider community's legitimate interests. These include protecting student welfare and providing a safe environment for services ancillary to higher education (e.g. accommodation), and minimising COVID-19 transmission in the city of Cambridge and other places travelled to by University of Cambridge students. Any health data about you (e.g. COVID-19 test results if you consent to swab (see Part B), or inferences about possible COVID-19 status from belonging to a household with a positive pooled test result) comprise a special category of personal data. The lawful bases for this data processing are to protect the public interest in the area of public health, for preventive medical purposes and for scientific research purposes in the public interest. Although it is not relied upon for compliance with the GDPR, students are given the general choice to opt-in or -out of some aspects of the programme (see Part B).
- **Accountability:** The University and Colleges are responsible under the GDPR to ensure that all personnel and data processors involved in this programme protect your rights and informational privacy, and follow applicable privacy and information security legislation (principally the GDPR, and the DPA).
- **Information security:** Students' personal details will be held securely on systems located either in the UK or in the EEA, which are supplied to the University with GDPR-compliant security levels and contracts. (Test results are stored separately – see Part B). Personal data will be encrypted for storage and transmission, and backed up. Access will be carefully controlled.
- **Communication with you:** While the University and Colleges respond to the current pandemic, you may be contacted by email about this programme for example with updates to the programme, renewed invitations to participate in pooled testing or recommendations that you arrange an individual test. The University and/or your College may also communicate with you when you should self-isolate, for example if your household is linked with a positive pooled test result, or someone in your household (i.e. in close contact with you) receives a positive individual test.
- **Access by others:** Responsible University and College staff, and standard suppliers under contract to provide technological services, will have carefully controlled access to personal data to support the asymptomatic testing programme, but only when necessary.
- **Monitoring, evaluation and scientific research:** Personal data collected about the programme may be processed to support monitoring and evaluation of this programme, and for research in the public interest by the University of Cambridge and other researchers. Wherever possible, this will be done using pseudonymised information (i.e. information with

your identifying details removed and not passed on). If any data is presented or published, the data will be fully anonymous, without any means of identifying you. Researchers will abide by codes of ethical conduct.

- **Data storage and retention:** Personal data will be retained for as long as necessary to support the response to the current pandemic, and pseudonymised information (i.e. information with your identifying details removed) will be retained thereafter for as long as necessary for scientific research purposes, which may be up to 20 years.
- **Your rights:** If you need further assistance beyond this Privacy Notice and the Student Information Sheet about how your personal information is being used, please contact the University's data protection team ([data.protection@admin.cam.ac.uk](mailto:data.protection@admin.cam.ac.uk)) or its Data Protection Officer ([dpo@admin.cam.ac.uk](mailto:dpo@admin.cam.ac.uk)). You also have rights under the GDPR including: to have access to personal data held about you; to correct your personal data; to object to processing of data, and to ask that data be erased. In accordance with the GDPR, these rights are not absolute in this programme. For example, data processing may continue if necessary in the public interest, but not if it is likely to cause you substantial distress. In accordance with the GDPR, your right to erasure is qualified because the lawful bases for processing are to protect public health, preventive medicine and scientific research. You have the right to erasure if data is no longer going to be used for the purposes of this programme, or the purposes for which it was originally collected. If you make a request, we have one month to respond to you. To make a request, please contact the University's data protection team ([data.protection@admin.cam.ac.uk](mailto:data.protection@admin.cam.ac.uk)) or its Data Protection Officer ([dpo@admin.cam.ac.uk](mailto:dpo@admin.cam.ac.uk)).
- **Complaints:** If you wish to complain about how your personal data is being handled in the course of this programme, please notify a responsible person at the University and/or your College as soon as possible so that it can be addressed swiftly. In the University, you can contact the University's data protection team ([data.protection@admin.cam.ac.uk](mailto:data.protection@admin.cam.ac.uk)) or its Data Protection Officer ([dpo@admin.cam.ac.uk](mailto:dpo@admin.cam.ac.uk)). In your College you can contact your College's Data Protection Lead and thereafter, if you are dissatisfied with that response, the Data Protection Officer for the Colleges ([college.dpo@ois.cam.ac.uk](mailto:college.dpo@ois.cam.ac.uk)). If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<http://ico.org.uk/>)

## Part B. Additional data processing for students who CONSENT to swabbing

In addition to the data processing and rights explained above, students who consent to swab in the asymptomatic testing programme should note the following:

- **Additional data controllers and data processors, etc.:** Cambridge University Hospitals NHS Foundation Trust is an additional data controller, which provides secure appointment bookings for individual tests following a positive pooled test. External laboratory service providers (e.g. AstraZeneca) will be contracted to carry out tests but they will *not* have access to any information that identifies you as an individual; they will handle what is known as pseudonymised data.
- **Additional types of personal data:** In addition to basic personal information described above, if you consent to swab as part of the asymptomatic programme, data processed for this programme will include your pooled testing group, the results of your pooled tests, confirmation of attendance for an individual follow-up test, and, where applicable, results of

individual tests. It will also include your mobile phone number if you provide a mobile phone number on the consent form.

- **Legal basis for processing additional personal data:** The legal bases under the GDPR for processing your test results and information about your pool are the same as stated above. The lawful basis we rely on is to perform public tasks, and tasks in the public interest. These include providing higher education safely, supporting public health COVID-19 surveillance and management, and supporting scientific research into COVID-19. We also rely on the lawful basis of meeting the University's, Colleges' and wider community's legitimate interests. These include protecting student welfare and providing a safe environment for services ancillary to higher education (e.g. accommodation), and minimising COVID-19 transmission in the city of Cambridge and other places travelled to by University of Cambridge students. Your test results comprise a special category of personal data, namely personal data concerning health. The lawful bases we rely on for this data processing are to protect the public interest in the area of public health, for preventive medical purposes and for scientific research purposes in the public interest. In order to properly protect public health, consent is not being relied upon as the legal basis for processing your test results but as a general means for you to control the creation of test data and to keep interferences in privacy proportionate to the public interest goals.
- **Additional accountability:** in addition to GDPR protections, all persons handling health data about you will be subject to a legal duty of confidentiality. This protects health information about you from misuse.
- **Additional information security:** The University will store test results on systems which meet the Data Security and Protection standards set by NHS Digital (<https://www.dsptoolkit.nhs.uk/OrganisationSearch/8F331>), provided by GDPR-compliant contractors. The systems are externally audited and meet ISO27001:2013. Designated personnel in the University and Colleges will be able to access the results of tests (pooled and individual) in the asymptomatic testing programme by logging into the University's secure IT system that stores test results.
- **Additional communication with you:**
  - **About pooled test results:** The way that you will receive results after a pooled test depends on whether you supply a mobile number on the consent form. If supplied, you will receive a text message swiftly from the University (usually within one day). Otherwise, you will be contacted by your College as soon as possible. If your pooled test result is positive, you will also be contacted by email by the Cambridge University Hospitals NHS Foundation Trust appointment bookings team with a proposed appointment time for an individual test.
  - **About individual test results:** The way that you will receive individual test results is similar. If you supply a mobile number, individual test results will be sent to you by text message. Alternatively, you can view your individual level test results via the hospital's MyChart system. Designated personnel at your College will be able to view and inform you of your results via the University's dedicated storage system for tests results. If you organise an individual test through the [University's symptomatic testing programme](#) or the NHS' test-and-trace programme, you will receive your results in accordance with their protocols.
  - **About close contacts:** In the event of a positive individual test result, you may be contacted by local and national public health authorities, the University or your College and asked for additional information to help track-and-trace recent close contacts and for outbreak management purposes.
- **Additional data sharing with others:**
  - **Cambridge University Hospitals NHS Foundation Trust:** Necessary identifying information held by the University of Cambridge (including your University of



Cambridge email address) will be passed onto Cambridge University Hospitals NHS Foundation Trust to register on Epic (the hospital's secure electronic medical record system, which is used to book all individual tests in the University's COVID-19 testing pathways) and MyChart (the patient-facing view to Epic). If you are not already registered with Epic, you will be registered. After your household submits a pooled test, it will be sent with a barcode to the Cambridge COVID-19 testing facility at the University's Anne McLaren Building on the Cambridge Biomedical Campus (part of the UK Lighthouse Labs network). In the event of a positive pooled test, Cambridge University Hospitals NHS Foundation Trust ~~in order~~ will receive information to book appointments for *individual* confirmatory tests. After individual tests, Cambridge University Hospitals NHS Foundation Trust will receive results from the Cambridge COVID-19 testing facility, record the results in individual patient health records (Epic) where the patient can view them (MyChart), and report results of individual test appointments to the University's highly secure test results database. Information shared between the University and Cambridge University Hospitals NHS Foundation Trust will include sufficient personal information to ensure test results are matched with the correct individual, laboratory data necessary for clinical and public health value, and appointment confirmation to support rapid contact tracing. A Privacy Notice for Cambridge University Hospitals NHS Foundation Trust is available [here](#). For questions about data protection by the Cambridge University Hospitals NHS Foundation Trust, please contact: [gdp.enquiries@addenbrookes.nhs.uk](mailto:gdp.enquiries@addenbrookes.nhs.uk)

- **Public health authorities:** In the event of a positive individual test result, data about you will be reported to public health authorities by Cambridge University Hospitals NHS Foundation Trust in accordance with public health legislation, and will be processed to support their standard COVID-19 management procedures. The University and Colleges may also have legal duties to report confirmed COVID-19 infections to public health authorities, and will cooperate with public health authorities' efforts to track-and-trace close contacts, and if necessary will supplement this with their own efforts to track-and-trace close contacts who are members of the University as part of its outbreak management plans.
- **External laboratory services:** After you submit your swab, your pool leader should dispose of the envelope that has identifying details. 'Bar-coded' swabs will then be processed by the University, with assistance from external laboratory services such as AstraZeneca, at the Cambridge COVID-19 testing facility at the University's Anne McLaren Building on the Cambridge Biomedical Campus (part of the UK Lighthouse Labs network). External laboratory service providers will thus *not* have access to any information that identifies you as an individual; they will handle what is known as pseudonymised data. This public/private partnership is not unusual; the NHS/government also has partnerships with commercial laboratory service providers for symptomatic COVID-19 tests. For pooled test results, the Cambridge COVID-19 testing laboratory will send coded results to the University's highly secure test results database, which in turn will share positive pooled results with the Cambridge University Hospitals NHS Foundation Trust in order to book individual test appointments. For individual test results, the laboratory will send coded results to the Cambridge University Hospitals NHS Foundation Trust, which will then share information necessary to identify asymptomatic students with the University.
- **Other students:** All swabbing students in your asymptomatic testing *pool* will receive positive and negative pooled test results. All students in your *household* will be informed if there is a *positive* pooled test result (including students who do not swab), so that all members of the household can commence self-isolation. Other students will *not* receive your individual test results. Students will not be told who



has consented to participate in the asymptomatic testing programme, but this could be inferred from the addressees on the swabbing kit envelope and attendance at the time designated for pooled sample collection.

- **Additional information about scientific research:** If you explicitly consent, you may be contacted by researchers from the University of Cambridge and other institutions about other studies related to this programme (e.g. studies about COVID-19, screening programs, infectious disease, public health surveillance). If you decline, this will not affect ongoing research, nor preclude lawful enquiries from researchers who rely on grounds other than consent as the lawful basis for contacting you. You have no obligation to participate.
- **Withdrawing consent to participate in the programme:** You may withdraw your consent for optional parts of the programme at any point without affecting your legal rights (see Part A). To withdraw, you submit a new consent form with your new preferences. You may withdraw your phone number. You may withdraw consent to be re-contacted by researchers. You may also withdraw general consent which withdraws you from the list of students requesting swab kits. In that case, weekly swabbing kits will not be sent to you (but may be sent to your former pool). After withdrawal of general consent, relevant data about you (including data collected up to the point of withdrawal including under this Part B) will be retained and processed in accordance with the information above (see Part A) which applies to all students.

### Changes to this Privacy Notice

We keep this Privacy Notice under regular review to make sure it is up-to-date and accurate. We are having to react quickly to unprecedented circumstances, which require significant organisation, in a fast-changing public health and regulatory environment. We will notify all students of material changes to this Privacy Notice, but please check back regularly to this section for updates.