



## Privacy Notice

**Name of Processing:** Online Travel Risk Assessment

**Description of Project:** Staff and Students complete an online Travel Risk Assessment form regarding any travel risks that should be assessed before they are permitted to travel overseas. Once completed, the online form is automatically submitted to the Head of Department/Dean for approval.

Data Controller	Edinburgh Napier University
Purposes for collection/processing	To identify and make an assessment of any risks that are associated with staff/student overseas travel on university business.
Legal basis	<p>GDPR Article 6(1)(b) – Processing data as part of a contract or at the request of the data subject prior to entering into a contract. We may process your data in order to make an assessment of risks of you undertaking travel overseas on University business.</p> <p>GDPR Article 6(1)(e), performance of a task in the public interest/exercise of official duty vested in the Controller by Statutory Instrument No. 557 (S76) of 1993 as amended, e.g. for education and research purposes.</p> <p>GDPR Article 9(2)(b) - 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 and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.</p> <p>GDPR Article 9(2)(g), as permitted by under section 10(3), and paragraph 16 of schedule 1, of the Data Protection Act 2018 for the processing of special category (sensitive) personal data for the purposes of providing support and ensuring the safety of individuals with particular disabilities or medical conditions.</p> <p>GDPR Article 9(2)(i) - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and</p>



	<p>freedoms of the data subject, in particular professional secrecy.</p> <p>The data is collected to safeguard the traveller.</p>
Whose information is being collected	Individual staff and student data including in some instances special category health data.
What type/classes/fields of information are collected	<p>Personal data including name, identifying numbers, contact details and in some cases sensitive health data is required so the university can assess any risks that should be considered before a staff or student member travels overseas together with any mitigations that should be put in place to reduce the risks associated with travel.</p> <p>When completed the online travel risk assessment form will be forwarded to the Head of Department/Dean of their delegate who will approve or deny travel. The approver may wish to discuss some of the information provided with the staff/student member involved in making a decision about whether or not to approve travel.</p>
Who is the information being collected from	Directly from the data subject i.e. the staff or student traveller.
How is the information being collected	Online form.
Is personal data shared externally	Yes – name, travel location and contact details may be shared externally with the University’s safeguarding provider, Gardaworld. Personal Health data will not be shared.
How secure is the information	<p>The information will be held locally by Information Services, information and will be stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies and redundant hardware. 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. The University makes use of a number of third party, including “cloud”, services for information storage and processing, including processing of information necessary for the provision of travel safeguarding and support services via Gardaworld. Through procurement and contract management procedures the University ensures that</p>



	these services have appropriate organisational and technical measures to comply with data protection legislation.
Who keeps the information updated	The individual staff or student member has access together with the approver of the travel risk assessment and health and safety staff.
How long is the information kept for	The data will be kept for three years after the duration of travel.
Will the data be used for any automated decision making	No
Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.	No
<p>You can access all the University's privacy notices using the following link:  <a href="https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx">https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx</a>            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: <a href="https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx">https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx</a></p>	