

COVID 19 Policy for Staff at Oxford International Education Group

Version: 3/Feb 22

Created by Group Compliance and Operations Director

Reviewed by: Group HR Director/ CEO

Introduction: Oxford International Education Group (OIEG) is committed to the safety of all students, customers, colleagues, contractors and all of our other stakeholders. In addition, in accordance with the Health & Safety at Work Act 1974, the employer has a duty *“to ensure so far as is reasonably practicable, the health, safety and welfare at work of all its employees”*.

As of 24th of February 2022 people who test positive for COVID-19, and contacts who are not fully vaccinated, are no longer legally required to self-isolate. Nevertheless, people who test positive for COVID-19 are advised to continue to stay at home and avoid contact with other people. Fully vaccinated contacts of people who test positive for COVID-19 are no longer advised to test for 7 days.

Businesses are no longer recommended to display NHS QR posters or collect contact details from visitors.

The purpose of this policy is to clarify OIEG’s position in relation to: Vaccination, Testing and Attendance at work for staff who have either tested positive for COVID 19 or have been identified as a contact of someone who tested positive for COVID 19.

This policy is based on the following documents (and will be reviewed and updated as guidance changes):

- a. Working Safely during Coronavirus (COVID 19) – Offices, factories and Labs – last updated 24 February 2022
 - b. COVID-19: people with COVID-19 and their contacts- published 24 February 2022
1. **Testing including if you test positive for COVID 19:** OIEG wants to help to limit the spread of coronavirus among our colleagues and the wider public, and to protect our colleagues, students, partners and clients during the pandemic. We therefore recommend that employees continue to test regularly when attending the office. Here is the link on how to access asymptomatic testing. <https://www.nhs.uk/conditions/coronavirus-covid-19/testing/regular-rapid-coronavirus-tests-if-you-do-not-have-symptoms/>

Vaccinated employees should be tested in the same way as others as the vaccine is not 100% effective at preventing the spread of COVID-19 infection and the effect on transmission is still being investigated.

OIEG expects all employees to stay at home and take a COVID 19 test if they experience any of the main COVID 19 symptoms. This is to ensure the safety of our colleagues, students, customers and stake holders.

Our approach to testing is in addition to and not a replacement for the measures set out in our COVID 19 risk assessment We encourage you to be tested even if you have been vaccinated against coronavirus.

In the case of a positive COVID test: You should stay at home and avoid contact with other people. This can be for up to 10 days from when your symptoms start. Many people will no longer be infectious to other people after 5 days. You can do a rapid lateral flow test from 5 days after your symptoms started (or the day you had the test if you do not have symptoms) and another the next day. If both tests are negative and you do not have a high temperature you're less likely to pass COVID 19 to others and you can go back to your normal routine. If your test result is positive on day 5 you can carry on doing rapid lateral flow tests every day until you get 2 negative tests in a row. You are no longer required to inform your line manager that you have tested positive for COVID 19 but you should inform them if you are unable to attend work for any reason and the guidance remains that you should stay at home if you have tested positive for COVID 19.

2. Contacts of Confirmed Cases of COVID 19

- a. If you live with or have stayed overnight with someone who tested positive for COVID 19:
 - i. You are advised to limit contact with the person who has tested positive
 - ii. You should work from home if you are able to do so
 - iii. Avoid contact with anyone who might get seriously ill from contracting COVID 19.
 - iv. If you develop symptoms at work, please follow the procedure outlined in our Covid 19 risk assessment <https://www.oxfordinternational.com/wp-content/uploads/2021/08/covid-19-riskassessmentoieg-July-2021.pdf> (inform your line manager, immediately return home avoiding public transport if at all possible and obtain a PCR test as soon as possible).
 - b. If you have been in contact with someone who tested positive with COVID 19 you should follow the guidance here <https://www.gov.uk/guidance/covid-19-coronavirus-restrictions-what-you-can-and-cannot-do>. You are no longer required to self-isolate.
 - c. If you test positive and choose to inform your line manager or HR department, only your line manager and the HR team will be aware. You will not be named as a positive case. However, we will take steps to track your colleagues with whom you have had close contact and alert them that they have been in contact with someone who has tested positive, and organise a deep clean of the areas in which you were working¹.
3. **Self-isolation:** If you follow the government guidance and self-isolate due to either testing positive for COVID 19 or living with/having stayed overnight with someone who tested positive for COVID 19 and do not have any symptoms of COVID 19, you will be expected to continue working from home as normal if you are able to. If you are not able to work from home but have tested positive for COVID 19 and are feeling unwell, you may be eligible for contractual or Statutory Sick Pay in accordance with the OIEG Sickness Absence Policy and Procedure.

¹ In Colleges and Schools this will be done by a member of the Senior Management Team and in the office environment it will be done by the designated Single Point of Contact (SPOC). In the case of Schools and Colleges this goes further than government guidelines where reliance is on Test and Trace to contact relevant people

4. **Vaccination:** OIEG strongly encourages all colleagues to take up the UK government's offer of the COVID 19 vaccination. This is to protect themselves as well as the rest of our employees, customers, staff and other key stakeholders and is in line with the NHS on the advisability of getting vaccinated: <https://www.nhs.uk/conditions/coronavirus-covid-19/coronavirus-vaccination/coronavirus-vaccine/>. Some colleagues may either not wish to take up the vaccine or may not be able to get vaccinated for health reasons. Please inform your line manager or the HR department if there are health reasons that require OIEG to make reasonable adjustments to protect you when attending the work place.
5. **Other relevant documents:** This policy should be read in conjunction with the OIEG COVID 19 Risk assessment and the OIEG Sickness Absence Policy and Procedure.

EMPLOYEE & CONTRACTOR COVID 19 PRIVACY POLICY

1. Who is the Data Controller and how to get in touch Oxford International Education and Travel Ltd (“OIET”) and its subsidiaries (LIPC Partnership Ltd, ICD Partnership Ltd, BIC Partnership Ltd, Greenwich International College Ltd, JIC Partnership Ltd, OIDI Ltd, Oxford International Education Group Services Ltd) are the controllers.

That means we decide why and how we store and use your information.

We have appointed a Data Protection Officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data.

Our current Data Protection Officer is Bulletproof Cyber Ltd who can be contacted as follows:

Address: Units H/J/K Arlington Business Park, Gateway 1000, Whittle Way, Herts, SG1 2FP

Phone number: 01438500090

Email address: dposupport@bulletproof.co.uk

If you think Oxford International Education and Travel Ltd or its subsidiaries is processing your data in a way which is unlawful, you can make a complaint to the Information Commissioner’s Office, which is the UK data protection regulator. More information can be found on the Information Commissioner’s Office website at <https://ico.org.uk/>

2. What is this document and why should you read it?

This document explains what personal data OIET (and its subsidiaries) will process to support the NHS Test and Trace service, which is a key part of the country’s ongoing COVID-19 response as well as to comply with the Health and Safety at Work Act 1974 in order to keep employees and other key stakeholders safe in our premises. It will also explain how this data will be processed, the lawful conditions under which it is processed, details of the data sharing, the length of time data will be retained, and information about your data protection rights.

This document only relates to personal data processed in response to the COVID 19 pandemic. It does not relate to general processing of personal data relating to specific groups within our wider community (such as alumni, staff or students), or types of activities (events, or widening participation activity). Details of other Privacy Notices can be found here: <https://www.oxfordinternational.com/about-oxford-international/privacy-policy/>

Please refer to our other Privacy Notices linked above for information on our stance in relation to automated decision-making and profiling of data.

You should read this document so that you understand how our use of your data will help OIET and its subsidiaries keep our employees and students safe as well as support the NHS tackle localised clusters and outbreaks of the virus.

3. What personal data is processed?

The personal data processed in response to the COVID 19 pandemic is derived directly from individuals and from our existing systems.

If you fill in a booking form to reserve a hotdesk or meeting room or attend on-site appointments, we will collect the following personal data from you directly:

- Your name
- Your email address
- The approximate times of your arrival
- The location you will be attending
- Confirmation that you are not experiencing COVID 19 symptoms

We will also use existing data from our line of business systems to assist the process of identifying relevant individuals in the event we are alerted about a positive COVID-19 case on in our offices, schools or colleges. The types of personal data derived from these systems will not exceed the categories of personal data listed above.

4. How will your personal data be used, and is it lawful?

We encourage colleagues, contractors and students to take regular COVID 19 tests prior to attending the office. If you share a positive result with us, we will disclose this information to your line manager and relevant individuals within the HR team (where appropriate for the purposes of statutory or contractual sick pay). We will also share this information with NHS Track & Trace as per government guidance. We will inform close contacts who attended the office/school on that day that someone has tested positive but we will NOT identify you.

As we are processing health data the relevant Article 9 UK GDPR condition for processing is Article 9.2.b Employment, social security and social protection law – for keeping our employees and students safe. This is because as an English Language and Foundation provider we are not able to use other mitigating methods in our offices and our schools – such as wearing masks as students must understand what you are saying in their English language lessons for example or social distancing. As we have a large number of international students who are young and possibly unvaccinated, our employees are more likely to be in contact with the virus and therefore at risk of catching and spreading it. Additionally, we are also relying on Article 9.2.i Public Health - protecting against serious cross-border threats to health.

We have also adopted a hybrid working approach that requires staff to come into our offices for 2 or 3 days a week and in some instances more frequently. This is because we believe that there are significant operational benefits from colleagues being physically present with each other.

We will ensure that the volume of data processed to achieve the purpose is kept to an absolute minimum.

Any health data processed specifically in relation to the COVID 19 pandemic will be kept separately from your normal HR records and only relevant members of our HR department and line manager will have access to it. Additional security measures will be in place to ensure only restricted personnel has access to this data and it is automatically deleted at the end of the retention period.

Your personal data will not be used for any purpose incompatible with the information in this privacy notice or any other relevant privacy notice you have been given by OIET.

5. Who do we share your data with, and why?

We will only share your data with NHS Test and Trace where requested. Otherwise, your data will be held securely on systems provided by our contracted partners.

6. Will you transfer data overseas?

We will not transfer any data outside of the European Economic Area. We will only share data with the NHS Test and Trace service, and all of our systems store data within the European Economic Area.

7. How long will you retain data?

Both vaccination status and Covid status data will be kept for a period of 12 months. This is to ensure that we are able to respond appropriately to the ongoing COVID 19 pandemic and do not ask for data repeatedly from you. Covid status data will also be kept for 12 months for auditing purposes where SSP or contractual sick pay was paid to employees.

What are your rights?

Right of Access

You have the right to the information which the OIET holds about you. A guide on how to make a 'Subject Access Request', including requirements for proving your identity, is available on our intranet here: [Making a request for your data](#)

Right to correct your data

If you believe data we hold about you is incorrect as to a matter of fact, or if your information changes, please write to us as soon as possible, or use the online services available to you.

Right to restrict processing

If you believe OIET and its subsidiaries is processing your data unlawfully, you can ask us to restrict the processing of your data whilst we investigate your complaint. When we restrict your data, we will store it securely to mark it as restricted and won't process it in any other way.

Right to objection

You have the right to opt-out of us sharing your data with NHS Test and Trace. Because it is necessary for OIET to take a proportionate approach to support NHS Test and Trace, if you object to having your data shared, please let HR or your line manager know.

OIET has put in place measures to ensure that all activities and services can be accessed remotely, so you should not be put at a disadvantage if you cannot attend our offices in person.

If OIET corrects your personal data at your request and that data has been passed to the NHS Test and Trace service, OIET is responsible for taking reasonable steps to ensure that the corrected data is communicated to them.

If you wish to exercise any of these rights, please contact our Data Protection Officer (contact details in the section [Who is the data controller and how to get in touch](#)) in the first instance.