

Temperature Testing Privacy Notice and FAQ's



In response to the COVID-19 pandemic, the Wates Group Limited group of companies (“**Wates**”, “**we**”, “**us**” or “**our**”) are committed to meeting our data protection obligations and handling your information securely.

This notice is to make it easier to understand why we are processing your information when you are working at or visiting our Leatherhead or Drummond Street offices during the pandemic period. This notice also provides information about your rights and about how you can contact us if you have questions about how we handle your data and should be read in conjunction with our **employee privacy notice** and our **website privacy notice**.



Who does this Privacy Notice apply to and what does it cover?

During early December until March 2021, we are trialling a temperature reading system (the **System**) for all workers and employees who attend our Leatherhead and Drummond Street offices.

This System will be an additional preventative check to our present requirements for staff and visitors attending our non-site offices to mitigate the risks to individuals being exposed to and/or transmitting COVID 19, and to ensure the safety of the workplace.

It is important that you read this notice along with our other Privacy Notices, which explain how we will use the information that you provide us and that we collect about you:

- Website Privacy Notice (**Gov-656**)
- Employee Privacy Notice (**Gov-652**)
- Safeguarding Notice (**Gov-653**)
- Covid-19 Privacy Notice



What information do we collect about you?

(a) Your Temperature Reading

If you attend our Leatherhead or Drummond Street offices between December 2020 and March 2021, you will be required to take a live temperature reading of your face, particularly your forehead, before you enter the rest of the building.

Your temperature will be taken using a free-standing infra-red camera that will take your skin-temperature reading and display the results to you and a member of our reception staff. As soon as you move away from the System, the information will disappear.

Your temperature reading information is not retained within the System but if you have a high temperature then you will be advised not to enter beyond the reception area and informed of any additional action that you may need to take, including who you should inform about not attending the office.

(b) Contact Details and Declaration

In accordance with the government's guidance, we will collect your contact details via the Covid-19 Questionnaire and Self- Declaration form (the **Forms**) as you enter the buildings via the reception area. These forms collect the following information:

For employees: name, employee ID, business unit / function, office location, ExCo Member, HR Support (HRD/HRBP), reason for variation to default 'working from home' guidelines, number of days per week from office, HR comments and ExCo member approval.

For visitors: name, company, signature, date, health related data in relation to you or anyone in your household who may be experiencing any COVID-19 related symptoms.



Why do we conduct skin temperature checks?

The skin temperature checks are an additional preventative step to our existing office-working requirements that we are taking during the pandemic to identify and intercept individuals displaying signs of potential fever. This facilitates our ability to reduce the risk of workers or visitors to the Leatherhead and Drummond Street offices being exposed to COVID-19 and other contagious diseases.



How will your information be used?

- (a) **Temperature reading:** If you have a high temperature above 37.8 degrees Celsius (as per the government's current COVID-19 guidelines), the System will inform you of this result in real time. As you will not be allowed to enter the building, our reception staff will let you know if you need to take any further action about not attending the office.
- (b) **Contact Details:** The contact details you provide us via the Forms will only be shared with the NHS Test and Trace service if anyone attending our offices have COVID-19 symptoms. Additionally, where we do so, we will only share the minimum information for each circumstance. As per government guidance, this information is held for twenty one days only. The government uses this information to track and trace individuals in order to safeguard public health and help contain clusters or outbreaks of the virus.



Who is the Controller for this processing?

Wates is a "data controller" in relation to this processing. This means that we are responsible for deciding how we hold and use the information collected about you.



What is our legal basis for using your information?

Our legal basis for processing your information are as follows:



We have a **legal obligation** to ensure a safe working environment for employees and others visiting the workplace under UK health and safety laws.



We have a **legitimate interest**:

- to ensure compliance with our legal health and safety duties as an employer, to provide a safe working environment, particularly in respect of the COVID-19 pandemic; and
- to increase confidence that in attending one of our offices, employees and visitors are in a safe working environment.



Additionally, as the temperature data is data relating to health, when processing this kind of information, we rely on the following conditions:

- Article 9.2.b - processing necessary for carrying out our employment obligations along with Paragraph 1, Part 1, Schedule 1, Data Protection Act 2018.

You are welcome to contact us for further information on the legal grounds that we rely on in relation to any specific processing of your health information.



How long will we keep your information?

We will only keep your information for as long as necessary, considering UK Government advice. In respect to your:

- (a) **Temperature reading**: this is not retained. It will only be used to make an immediate decision regarding entry to our offices;
- (b) **Contact Details** this will only be kept for 21 days. If it becomes necessary to share this information with the NHS Test and Trace Service, they may keep the details longer. For further details about how they handle your data, please refer to the NHS website and privacy notice



Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK's supervisory authority for data protection issues (www.ico.org.uk).

More details on your rights can be found in our Website Privacy Notice and Employee Privacy Notice (**Gov-652**), as applicable.



Changes to this Privacy Notice

It is also important that you check back often for updates to this Privacy Notice, as we may change this Privacy Notice from time to time during our response to the Covid-19 emerging situation. The “Date last updated” legend at the bottom of this page states when the Privacy Notice was last updated, and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting notice of the changes on our website or through any relevant services.



Data Protection Manager contact details

We have appointed a GDPR Privacy Team and a Data Protection Manager who are responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Privacy Team or the Data Protection Manager using the details set out below.

	The Privacy Team	Data Protection Manager
Name:	GDPR Privacy Team	Emma Sim (acting)
Acting on behalf of:	Wates Group Limited	Wates Group Limited
Email address:	gdpr@wates.co.uk	gdpr@wates.co.uk
Address:	Wates House	Wates House
	Station Approach	Station Approach
	Leatherhead	Leatherhead
	Surrey	Surrey
	KT22 7SW	KT22 7SW

If you have any questions regarding the collection, processing, or use of your personal information or if you wish to correct, block, rectify, object, access, revoke your consent to any applicable aspect of this Privacy Notice or delete any of your personal information, please contact us.

Date last updated: 15 December 2020

Temperature Testing – FAQ's

1. How is my temperature reading kept secure?

Wates recognises that the use of temperature checks may be considered intrusive for people attending the premises. To ensure the security and confidentiality of your information, the temperature reader system (“**System**”) is set so that no data is retained. The System will only take the temperature and display the results for you or a limited number of our staff on reception to see. Our staff have received an awareness briefing on the necessity to maintain confidentiality of this information.

2. Can I request a copy of my temperature measurement?

No. You will not be able to request a copy of temperature measurement as the data is only available in real-time when you are within the camera capture frame (i.e. in front of the camera). Wates does not store the data.

3. Does the temperature reader involve facial recognition technology?

The System operates by reading your forehead temperature only (i.e. no other parts of your body). Although it allows for facial detection, we have set the System to disable this functionality so that no facial images are captured.

4. Will my temperature measurement be accessible outside the UK?

No. The temperature reading System does not store any measurements. This means that this data is not stored either within or outside the UK.

5. Will any third-parties have access to my temperature reading?

No data from the temperature reader is stored on the System. As the information is displayed in real time only, this means that neither Wates nor Biosite Systems (the manufacturer of the temperature reader System) will have access to this information once your temperature has been taken.

6. How accurate is the temperature reader?

Biosite advise the System provides 99.8% accuracy of temperature readings. Outdoor temperatures can affect accuracy, but as Wates will not be using the System outside, this helps to ensure the accuracy of the readings. The device also allows for readings to be taken when individuals are wearing masks, enabling additional PPE to be worn as people access the premises (if necessary).

7. What do I do if I disagree with my reading?

You can retake your temperature if you disagree with your initial reading. However, you will need to display a reading below 38 degrees Celsius to be allowed into the rest of the office. Following this, if you have any questions regarding the collection, processing, or use of your personal information via the temperature measurement System, then please contact us at Privacy Team (gdpr@wates.co.uk).