

## Annex 1: Procedure to access the School

Following the COVID-19 emergency and the guidelines contained in the "Shared protocol for the regulation of measures to contrast and contain the spread of the Covid-19 virus in the workplace"<sup>1</sup> the following procedure regulating the entrance to the School premises is approved.

### 1.1 Access for employees and students of the School

It is allowed to enter the premises of the School to all those who have no symptoms suggestive of COVID-19 disease (temperature  $\geq 37.5$  ° C, cough and other respiratory symptoms, diarrhea, fatigue and muscle pain, anosmia and ageusia) and those who did not have close contacts with individuals with a confirmed diagnosis of COVID-19.

In the presence of non-suggestive symptoms of COVID-19, which make it difficult to wear a mask or comply with hygiene rules (e.g. allergic sneezing, conjunctivitis, etc.), it is suggested to proactively arrange smart working with the employer when possible.

Before their first access during Phase 2, all the members of the School, i.e. faculty, researchers, research collaborators, technical and administrative staff, contractors, fellows, and students, must attend an online information session (in Italian and English) prepared by the Prevention and Protection Service of the School about the rules of conduct to reduce the risk of contagion.

There is only one entrance to each building of the School:

- San Ponziano offices (ex-Boccherini)
- San Francesco
- Library

The exits, where possible, will be separated from the entrances.

Thermo-scanners will be present at the entrance of the buildings for detecting body temperature remotely.

As a personal duty and commitment to guarantee the safety of themselves and others, after the temperature measurement, employees and students of the School must fill out an electronic form confirming the requirements for accessing the premises.

The format of this questionnaire is described at the end of this document.

The access procedure therefore includes:

- i. temperature measurement;
- ii. triage via questionnaire;
- iii. actions following the outcome.

At the entrance, it is also mandatory to wear a mask and sanitize hands with a special gel made available by the School.

- i) **Temperature measurement.** Before entering the workplace, the staff will undergo a bodily temperature check.<sup>2</sup>

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<sup>1</sup> "Shared protocol for regulating measures to fight and contain the spread of the Covid-19 virus in the workplace", signed by the President of the Council of Ministers, the Minister of Economy, the Minister of Labor and Social Policies, the Minister of Economic Development and the Minister of Health. March 14, 2020, updated on April 24, 2020.

<sup>2</sup> The need for monitoring employees' health must be balanced with the protection of personal data. To this end, it is suggested to: 1) detect the temperature without recording the collected data, subject to the need to activate the entry ban procedure. In other words, it is possible to identify the interested party and record the temperature above the threshold only when necessary to documenting the reasons that prevented the access to the company premises; 2) provide information on the use of personal data simply

Employees, on their first daily access to a location, stand in front of the thermo-scanner and wait for the signal that the measurement has taken place.

If the temperature is below 37.5°C, the employee moves to triage, as described at point *ii*.

If the temperature is equal to or above the threshold of 37.5°C, the employee waits a few minutes and repeats the procedure. If the outcome is confirmed, the employees must follow the procedures described at point *iii*.

*ii) Triage.* The staff completes a statement regarding the absence of symptoms suggestive of COVID-19 and contacts at risk.

The self-certification model is shown in the appendix.

An electronic version is prepared for School staff.

The information on personal data use is available at every entrance.

*iii) Actions following the outcome.*

If the temperature is above or equal to 37.5° or there is only one symptom among those listed above linked to COVID-19 disease, the individual shall not access the School premises:

- the employee is forbidden to enter;
- the employee must immediately contact their family doctor (GP), follow the doctor's instructions, and notify the School.

## **1.2 Access for collaborators, guests, visitors, interns, etc.**

Collaborators, guests, visiting students/researchers and interns will follow the same entry and exit rules as the School's employees and students. Therefore, before accessing the School premises, they will undergo a bodily temperature check.

## **1.3 Access for the staff of service contractors**

The staff of service contractors will follow the same entry and exit rules as the School employees and students; therefore, before accessing the School premises, they will be subjected to bodily temperature check and triage.

The staff of service contractors providing regular services (conciierge, cleaning, etc.) will have to respect all the rules in place for the containment of the spread of COVID-19.

Service contractors will receive information material on the rules in force at the School.

## **1.4 Access for couriers, carriers and other occasional contractors**

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(using signs and icons) and refer to the official channels of the School for more detailed information; 3) define the appropriate security and organizational measures to protect data. In particular, from an organizational point of view, it is necessary to identify the individuals handling data, train them, and provide them with the necessary directions, also in view of specific confidentiality obligations. To this end, please note that the data can be used exclusively to prevent contagion from COVID-19 and must not be disclosed or communicated to third parties outside the specific regulatory provisions (e.g. a request from the Health authority to reconstruct the sequence of any "close contacts of an employee who tested positive for COVID-19); 4) in the event of temporary isolation due to exceeding the temperature threshold, ensure the employee's confidentiality and dignity. These guarantees must also be ensured when an employee notifies the HR office of contacts outside of the company environment with individuals who have tested positive for COVID-19 and when isolating an employee who develops fever and symptoms of respiratory infection during the work activity and their colleagues.

The access to the School premises for couriers will follow the same access procedure valid for the other categories indicated above, except for the following cases:

- Whenever possible, the drivers of the means of transportation must remain onboard their vehicles.
- For the necessary loading/unloading activities, maintenance, etc., the person concerned must respect the rules of physical distancing and wear suitable PPE.

### **Management of a symptomatic person**

If an individual develops a fever or flu-like symptoms attributable to the SARS-CoV-2 virus at the arrival or during their stay in one of the School's buildings, they are obliged to notify their doctor and the School immediately so that the appropriate measures are taken.

According to the provisions of the health authority, the isolation of the individual and other people nearby will be executed and the competent doctor will be notified. The School will communicate the incident to the competent health authorities and the emergency numbers for COVID-19, provided by the Region or the Ministry of Health.

The School collaborates with the Health Authorities for the definition of any "close contacts" of individuals on its premises that have tested positive for the COVID-19 swab. This allows authorities to apply the necessary and appropriate quarantine measures. During the investigation period, the School may ask any possible close contacts to leave the workplace as a precaution, according to the guidelines of the Health Authority.

## **COVID-19 Self-Certification: "Triage"**

### **First part to show on request**

This questionnaire is an integral part of the prevention of contagion from COVID-19, in the application of the anti-contagion safety protocols according to national legislation and regional decrees. If symptoms of contagion such as fever, cough, diarrhea, difficulty breathing, asthenia/myalgias (tiredness/muscle pain), anosmia (alterations or loss of smell) are experienced, it is required to declare them.

The undersigned \_\_\_\_\_ as a guest or employee of the company \_\_\_\_\_ (indicate company name), who visited on \_\_\_\_ / \_\_\_\_ / 202\_\_\_\_, provides the following information having read the privacy information available at the front desk and / or attached to this form, aware that false declarations are punishable pursuant to the penal code and special laws on the subject, pursuant to and for the purposes of art. 46 and 47 of the Presidential Decree n. 445/2000.

### **Self-certification of COVID-19 symptoms.**

#### **1) Select the location of the School you wish to enter \***

Select **one** of the following:

- San Ponziano headquarters (ex- Boccherini)
- San Francesco (Campus)
- Library

\* The selected location refers to the **FIRST** access of the day.

#### **2) Do you currently have symptoms related to COVID-19? \***

Select one of the following items

Select **one** of the following:

- No
- Yes

\* To detect possible infection, **even only one of the following symptoms** is taken into consideration:

- Fever  $\geq 37.5$  as measured by today's bodily temperature check at the entrance of the
- School premises (i.e. a warning signal was released by the scanning device)
- Cough
- Diarrhea
- Difficulty breathing (wheezing)
- Asthenia / myalgias (tiredness / muscle pain)
- Anosmia (changes or loss of smell)
- Ageusia (changes or loss of taste)

**3) Have you had any symptoms or contacts at risk for COVID-19 in the past 14 days? \***

Select one of the following items

Select **one** of the following:

- No
- Yes

\* To answer the question, please consider the contacts and symptoms listed below (**even only one of them**):

- Exposed to people with fever
- Exposed to a confirmed COVID case
- Symptoms as indicated in the previous question (Fever  $\geq 37.5$ ; Cough; Diarrhea; Difficulty breathing (dyspnoea); Asthenia / myalgias (tiredness / muscle pain); Anosmia (alterations or loss of smell); Ageusia (changes or loss of taste))

Date Signature

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**Second part to be left at the entrance**

The undersigned \_\_\_\_\_ as a guest or employee of the company \_\_\_\_\_ (indicate company name), who visited on

\_\_\_\_ / \_\_\_\_ / 202\_\_\_\_, School premises they must enter \_\_\_\_\_

Date \_\_\_\_\_

Has replied "NO" to both questions 2 and 3 of the COVID-19 self-certification "triage":

Signature

\_\_\_\_\_  
AUTHORIZED ACCESS

Has answered "YES" to either question 2 or 3 of the COVID-19 self-certification "triage":

Signature

\_\_\_\_\_  
ACCESS DENIED

## **INFORMATIVA AL TRATTAMENTO DEI DATI PERSONALI**

### **TITOLARE DEL TRATTAMENTO**

Titolare del trattamento è la Scuola IMT Altì Studi Lucca, in persona del Direttore, con sede in Lucca – Piazza San Ponziano 6, e-mail: [direttore@imtlucca.it](mailto:direttore@imtlucca.it).

### **FINALITÀ DEL TRATTAMENTO, BASE GIURIDICA E MODALITÀ DEL TRATTAMENTO**

Ai fini dell'applicazione della normativa europea e nazionale in materia (Reg. UE n. 679/2016, d'ora in poi Regolamento e D.Lgs. n. 196/2003 e ss.mm.ii), si informa che i dati personali forniti nell'ambito della procedura di ingresso alle sedi della Scuola sono trattati quale implementazione dei protocolli di sicurezza anti-contagio ai sensi dell'art. 1, n.7, lett. d) del DPCM 11 marzo 2020, in adempimento agli obblighi di sorveglianza del datore di lavoro rispetto al contenimento della diffusione del COVID-19.

La Scuola tratta i suoi dati personali conferiti nell'ambito della procedura di ingresso alle sedi mediante l'elaborazione delle informazioni fornite nell'autodichiarazione. Il processo prevede che nome, cognome presenza in una sede in una determinata data ovvero autorizzazione o meno all'accesso siano conservati per i 15 giorni successivi alla raccolta, dopodiché sono distrutti. In caso di mancato conferimento o di esito negativo del processo di autorizzazione, non sarà possibile accedere alle Sedi della Scuola.

Qualora Lei risieda nel Campus, il mancato conferimento delle suddette informazioni, ovvero la mancata autorizzazione all'ingresso determina l'attivazione della procedura gestione dell'allievo con sintomatologia, con possibile comunicazione alle autorità competenti e ai soggetti interessati.

Qualora Lei sia un lavoratore ai sensi del D.Lgs n. 81/2008 il mancato conferimento ovvero la mancata integrazione di uno dei requisiti della dichiarazione comporta la necessità di comunicare al Suo medico curante al fine di giustificare la Sua assenza dal luogo di lavoro.

Qualora Lei sia un fornitore o soggetto esterno, il mancato conferimento ovvero la mancata integrazione di uno dei requisiti della dichiarazione comporta l'impossibilità di fare ingresso nelle strutture della Scuola.

I suoi dati non saranno comunicati a terzi salvo che sia espressamente richiesto da una norma di legge per finalità connesse alle esigenze di contenimento e prevenzione del COVID-19. Il presente trattamento cessa alla cessazione dello stato di emergenza e contenimento del COVID-19.

### **DIRITTI DELL'INTERESSATO**

In qualità di soggetto interessato può chiedere in qualsiasi momento al Titolare: la conferma dell'esistenza o meno di dati personali che la riguardano; l'accesso ai suoi dati personali ed alle informazioni relative agli stessi; la rettifica dei dati inesatti o l'integrazione di quelli incompleti; la cancellazione dei dati personali che la riguardano (al verificarsi di una delle condizioni indicate nell'art.17, paragrafo 1 del Regolamento e nel rispetto delle eccezioni previste nel paragrafo 3 dello stesso articolo); la limitazione del trattamento dei suoi dati personali (al ricorrere di una delle ipotesi indicate nell'art. 18, paragrafo 1 del Regolamento), la spiegazione relativa al processo decisionale automatizzato, la trasformazione in forma anonima o il blocco dei dati trattati in violazione di legge, compresi quelli di cui non è necessaria la conservazione in relazione agli scopi per i quali i dati sono stati raccolti o successivamente trattati. In qualità di soggetto interessato ha inoltre diritto di opporsi in tutto o in parte per motivi legittimi al trattamento dei dati personali che la riguardano, ancorché pertinenti allo scopo della raccolta.

Tali diritti sono esercitabili rivolgendosi al Titolare. Inoltre, il Responsabile della protezione dati può essere contattato per tutte le questioni relative al trattamento dei dati personali all'e-mail: [dpo@imtlucca.it](mailto:dpo@imtlucca.it).

Qualora l'interessato ritenga che i suoi diritti siano stati violati dal titolare e/o da un terzo, ha il diritto di proporre reclamo all'Autorità per la protezione dei dati personali e/o ad altra autorità di controllo competente in forza del Regolamento.

Google form

The development of a Google form with this purpose could be useful:

- every day the user must complete a 'self-certification' by selecting the location they wish to enter, the absence of symptoms (temperature not above 37.5° C, absence of symptoms related to COVID-19, etc. ), no contacts with positive individuals, etc.;
- the validity of the form is daily;
- the electronic self-certification is kept only for the time necessary to keep track of the accesses, in compliance with the legislation on data usage.

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**IMT** SCUOLA ALTI STUDI LUCCA

### Autodichiarazione per sintomi COVID-19

Questo questionario è parte integrante della prevenzione del contagio da COVID-19 in tutte le attività della Scuola Alti Studi Lucca e serve per la raccolta di dati e per la valutazione del rischio di contagio. Il suo uso è riservato alle sole finalità di prevenzione e non può essere utilizzato per scopi di natura commerciale o di marketing. I dati raccolti saranno trattati in modo anonimo e non saranno comunicati a terzi. Per maggiori informazioni, visitate il sito [www.imt.it](https://www.imt.it).

Il tuo contributo è parte integrante della Scuola IMT Alti Studi Lucca. Aiutaci a migliorare i servizi e la didattica grazie al tuo feedback. Compilalo prima di ogni lezione o attività didattica in aula. Per ulteriori informazioni e per la privacy policy, visitate il sito [www.imt.it](https://www.imt.it).

Questo form è parte integrante della prevenzione del contagio da COVID-19 in tutte le attività della Scuola Alti Studi Lucca.

#### Scegli la sede della Scuola in cui vuoi entrare\*

Il tuo indirizzo email sarà utilizzato per il contatto di emergenza.

- Sede San Ponziano (ex-Boccherini)  

- Campus (ex-Fininvest)  

- Elettiva  
