



Abbots Ripton Church of England Primary School

Privacy Statement for COVID-19 Testing of Staff in Primary Schools

Written by: Claire Matthews (based on the Department for Education's model privacy notice for COVID-19 Testing of Staff January 2021)

Date: January 2021

Review date: September 2021

Our church school creates a firm foundation where together, with God's help and with the help of others, we learn for life, achieve our best and grow in faith.

Ownership of the Personal Data

To enable the Covid-19 testing to be completed at Abbots Ripton CE Primary School, we need to process personal data, including the sharing of personal data where this is allowed under the data protection legislation. Abbots Ripton CE Primary School is the Data Controller for the data required for the management of tests and implementing local arrangements in the event of a positive test.

We will process personal data relating to staff under article 6.1 (f) of the UK GDPR – where it is necessary in the legitimate interest of the data controller. We will process special category personal data under the provision of article 9.2 (i) of the UK GDPR, and Part 1 of Schedule 1 (3) of DPA 2018 where it is in the public interest on Public Health Grounds to ensure we can minimise the spread of COVID in a timely manner and enable us to continue to deliver education services as safely and securely as possible. This data is processed under the obligations set out in Public Health legislation (Regulations 3 (1) and (4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI) which allows the sharing of data for COVID related purposes and where it is carried out by a health care professional **OR** someone who owes an equivalent duty of confidentiality to that data.

Ownership of the Personal Data you share with the Department of Health and Social Care (DHSC)

Every time you use a lateral flow test you must report the results. More details can be found here – [Report a COVID-19 test result – Gov.UK \(www.gov.uk\)](https://www.gov.uk/guidance/report-a-covid-19-test-result). The DHSC is the data controller for the information that you transfer to them about you and your test results. For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#)

The school remains the Data Controller for the data we retain about you for the management of tests and implementing local arrangements in the event of a positive test.

You should read both this Privacy Notice and the DHSC COVID-19 Privacy notice to understand how your personal data is used prior to taking a test.

Personal Data involved.

The following personal data is processed by the school in relation to your test:

- Name
- Unique code assigned to each individual test and which will become the primary reference number for the tests
- Test result

For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#)

How we store your personal information

The school will maintain a test kit log which will record against your name details of the testing kit which has been provided to you. The school may also record Personal Data about you in its internal COVID-19 results register (the school's COVID-19 results register will not be shared with DHSC). This information will only be stored securely on locally managed systems with appropriate access controls in schools and will only be accessible to personnel involved in the management of tests and implementing local arrangements in the event of a positive test.

The school will retain its testing kit log and COVID-19 results for a period of twelve (12) months from the date of the last entries made by the school into them.

For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#).

Processing of Personal Data Relating to Positive test results

We will use this information to enact our own COVID isolation and control processes without telling anyone who it is that has received the positive test.

For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#).

This information will be kept by the school for the period of twelve (12) months and by the NHS for eight (8) years.

Processing of Personal Data Relating to Negative and Void test results

We will record a negative and void result for the purpose of stock controls of tests and general performance of the testing process.

Data Sharing Partners

The personal data associated with the test results will be shared with:

- DHSC, NHS, PHE – to ensure that they can undertake the necessary Test and Trace activities and to conduct research and compile statistical information about Coronavirus.
- Your GP – the NHS may share the information you provide with your GP to maintain your medical records and to offer support and guidance as necessary. Any data you provide to the school will not be shared with your GP.
- Local Government to undertake local public health duties and to record and analyse local spreads.

Personal Data in the school's test kit log will be shared with DHSC to identify which test kit has been given to which individual in the event of a product recall. The school will not share its internal COVID-19 results register the DHSC.

Your Rights

Under data protection law, you have rights including:

Your right of access- you have the right to ask us for copies of your personal information.

Your right to rectification – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure – You have the right to ask us to erase personal information in certain circumstances.

Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing – You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at office@abbotsripton.cambs.sch.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at office@abbotsripton.cambs.sch.uk or you can also contact our Data Protection Officer:

Donna J Flynn
Email: dpo@theictservice.org.uk
Tel: 0300 300 0000

Speke House,
17 Compass Point Business Park,
Stocks Bridge Way,
St Ives,
Cambs PE27 5JL

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

Information Commissioner's Office
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
Helpline number: 0303 123 1113