

# Privacy Notice

## Covid-19 Testing



### Introduction

To enable the Covid-19 testing to be completed at Cardinal Newman Catholic School and St Joseph's Catholic High School, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation.

St Thomas Catholic Academies Trust is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the schools to ensure we meet our public health and safeguarding legal obligations. Personal data relating to tests for pupils is processed under paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014. Personal data relating to staff is processed under the legitimate interest of the Data Controller to ensure we can minimise the spread of COVID in a timely manner and enable us to continue to deliver education services safely and securely.

If a staff member or pupil declines a test, we record your decision under the legitimate interest of the school in order to have a record of your decisions and to reduce unnecessary contact with you regarding testing.

The processing of personal data is processed under the following provisions of GDPR:

Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller'.

As information about health is a special category of personal information, further section of the GDPR applies:

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 healthcare'.

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 which allows the sharing of data for COVID related purposes.

Data Controllorship is then passed to the Department of Health and Social Care (DHSC) at the point that we transfer data to them.

### Personal data involved in the process

We use the following information to help us manage and process the tests:

- Name
- Date of birth (and year group)
- Gender
- Home postcode
- Email address
- Mobile number
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests
- Test result
- Parent/guardians contact details (where required)

We will only use information that is collected directly from you specifically for the purpose of the tests, even if you have previously provided us with this information.

#### **How we store your personal information**

The information will only be stored securely on local spreadsheets in the schools whilst it is needed. It will also be entered directly onto DHSC digital services for the NHS Test and Trace purposes. Schools will not have access to the information on the digital service once it has been entered.

#### **Processing of Personal Data relating to positive test results**

The member of staff, pupil or parent (depending on contact details provided) will be informed of the result by the school and advised how to book a confirmatory test.

The school will use this information to enact their own COVID isolation processes without telling anyone who it is that has received the positive test.

The information will be transferred to DHSC, who will share this with the NHS. PHE and Local Government will use this information for wider test and trace activities as well as statistical and research purposes.

This information is processed and shared under obligations set out in Public Health legislation under Regulations 3(1) and (4) of the Health Service (Control of Patient Information) Regulations 2002 which allows the sharing of data for COVID related purposes.

This information will be kept by the school for up to 14 days and by the NHS for 8 years.

#### **Processing of Personal Data relating to negative test results**

The school will record a negative result and the information will be transferred to DHSC. PHE and the Local Government will use the information for statistical and research purposes.

This information is processed and shared under obligations set out in Public Health legislation under Regulations 3(1) and (4) of the Health Service (Control of Patient Information) Regulations 2002 which allows the sharing of data for COVID related purposes.

This information will be kept by the school for up to 14 days and by the NHS for 8 years.

#### **Processing of Personal Data relating to declining a test**

The school will record that you have declined to participate in a test and this information will not be shared with anyone.

#### **Data sharing partners**

The personal data associated with test results will be shared with DHSC, NHS, PHE and Local Government to ensure they take the necessary action they need to complete under their legal obligations.

#### **Your rights**

Under data protection law, you have rights including:

- Be informed about how the School uses your personal data.
- Request access to the personal data that the School holds.
- Request that your personal data is amended if it is inaccurate or incomplete.
- Request that your personal data is erased where there is no compelling reason for its continued processing.
- Request that the processing of your data is restricted.

- Object to your personal data being processed.
- Right to data portability

If you wish to make a request, in line with any of these rights, please contact the Trust Data Protection Office at [admin@stcat.co.uk](mailto:admin@stcat.co.uk). You are not required to pay any charge for exercising your rights. If you do make a request, the school has one month to respond to you.

### **Concerns**

If you are concerned about how we use your personal data, please contact your school in the first instance.

To contact the Trust Data Protection Officer: [admin@stcat.co.uk](mailto:admin@stcat.co.uk)

You can also contact the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1111

<https://ico.org.uk/concerns/>

### **Contact**

Should you wish to discuss anything in this Privacy Notice, please contact: Maxine Gilmartin, Trust Data Protection Officer: [admin@stcat.co.uk](mailto:admin@stcat.co.uk)