

## **Trinity School – COVID-19 Testing at home Privacy Notice**

### **Ownership of the Personal Data**

To enable the Covid-19 testing to be completed at Trinity School, we need to process personal data, including the sharing of personal data where this is allowed under data protection legislation. Trinity 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 students under article 6.1(f) of the UK GDPR – it is necessary in the legitimate interest of the data controller. We will process special category personal data under the provisions 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 shared with DHSC**

When you do your own testing at home, you must report the results online to DHSC and also tell Trinity School. More details on online reporting can be found here - [Report a COVID-19 test result - GOV.UK \(www.gov.uk\)](#).

The Department for Health and Social Care (DHSC) is the data controller for the information that you provide 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](#)

Trinity 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](#)

Coronavirus (COVID-19) testing: privacy information

Privacy notice for NHS Test and Trace virus testing for all users of the service.

## Test Kit Log

The following personal data is recorded by Trinity School in relation to tests you are given to use at home:

- First name, last name, telephone number and email address of Test Subject
- Details of lot/batch number for the test kits the Test Subject receive
- First name, last name of the operator distributing the Home Test Kits

For this Test Kit Log Trinity School is acting as a 'processor' of DHSC and this information will be sent to DHSC. For more information about what DHSC do with your data please see their [COVID-19 Privacy Notice](#)

### How we store your personal information

Trinity School will maintain the test kit log which will record against your name details of the testing kit which has been provided to you. Trinity School may also record Personal Data about you in its internal COVID-19 results register (Trinity 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.

Trinity School will retain its test kit log for no longer than five days after the test kit is provided. COVID-19 results register will be retained for a minimum of 14 days up to a month after the last entries are made by the school into them.

DHSC will retain information for up to eight (8) years. 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](#)

### 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 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.

Trinity School will not share its internal COVID-19 results register with 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 your 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 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 [insert email address, phone number and or postal address of school's DPO] 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 [Insert your organisation's contact details for data protection queries].

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