

Rainford High School – COVID-19 Daily Contact Testing (DCT) Trial Privacy Notice – Intervention Arm

Ownership of the Personal Data

To enable Covid-19 testing to be completed at Rainford High School, we need to collect personal data for staff and pupils, and to share personal data where we have a legal obligation. Rainford High School is the ‘controller’ (organisation who decides how personal data is used) for processing tests at school and to take actions to meet our public health and safeguarding obligations.

We are required by law to explain the ‘lawful basis’ for the use of your personal data (information about you). Use of data relating to tests for pupils is processed under article 6 (1) (e) of the UK GDPR (public task), paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 for independent schools including Academy Schools and Alternative Provision Academies is also relevant. Personal Data relating to staff is processed under article 6 (1) (f) of the UK GDPR (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 you decline a test, we record your decision under the legitimate interest of school in order to have a record of your decisions and to reduce unnecessary contact with you regarding testing, and we also share this information with the Department for Health and Social Care (DHSC) and the Office for National Statistics (ONS), for the purposes of evaluating the DCT process.

Special category personal data is processed under the provisions Section 9.2(i) of UK GDPR, where it is in the public interest on public health grounds. 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.

DHSC is the controller for data that we transfer to them about you and in relation to your test results. DHSC has asked us to collect that data for them, and so DHSC is the controller for it and the School is a ‘processor’ acting under their instructions. For more information about what DHSC do with your data please see both below and the Test and Trace Privacy Notice.

Personal Data involved in the process

We use the following information to help us manage testing at the School:

- Name
- Date of birth (and year group)
- Gender
- Ethnicity
- Home postcode
- Email address

- Mobile number
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests
- LFD test result
- Parent/guardians contact details (if 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.

Data sharing with the DHSC

The above information will be sent to DHSC (with the DHSC as a controller) for their research and evaluation purposes. We also send the name, date of birth, gender, ethnicity, address, email address, mobile number, and barcodes of PCR tests taken for the in-school contacts of each person taking part in DCT. The school collects this data on behalf of the DHSC, and so are a processor of this information.

The school will provide DHSC with confirmatory PCR test results, school attendance registers (name, email address and date of birth) and the School's Covid-19 test registers. For this information both the School and DHSC are controllers of the information.

DHSC will, without School involvement, analyse information provided and compare it against information held on Test and Trace systems. This allows them to review the transmission of Covid-19 and to assess effectiveness of Daily Contact Testing.

How we store your personal information

The information will only be stored securely by the school for a minimum of 14 days and up to a maximum of one month after the end of testing. It will be entered directly onto DHSC digital services for LFD tests and confirmatory PCR tests for the NHS Test and Trace purposes. Schools will not have access to the information on the digital service once it has been entered.

The information collected for DHSC's research and evaluation purposes will be transferred securely to DHSC and retained for up to 8 years. ONS may retain anonymised data for research purposes.

Processing of Personal Data Relating to Positive LFD test results

The member of staff, pupil, student or parent (depending on contact details provided) will be informed of the test result by the school. We will use this information to enact our own COVID isolation processes without telling anyone who it is that has received the positive test.

This information will be transferred to DHSC, who will share this with the NHS, GPs, PHE and the Local Government, who 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 (COPI) which allows the sharing of data for COVID related purposes.

This information will be kept by the school for a minimum of 14 days up to a month after the end of testing and by the NHS for 8 years.

Processing of Personal Data Relating to Negative and Void LFD test results

We will record a negative or void result and the information transferred to DHSC, NHS, Public Health England (PHE) and Local Government who 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 (COPI) which allows the sharing of data for COVID related purposes.

This information will be kept by the school for a minimum of 14 days and up to a month after the end of testing and by the NHS for 8 years.

Processing of Personal Data relating to declining a test

We will record that you have declined to participate in a test and this information will not be shared with anyone, other than with DHSC for their research and evaluation purposes.

Processing of personal data relating to PCR tests

On days 2 and 7 of your DCT, you will also take a PCR test. If you test positive on the LFD test on any day other than day 2 or 7 you would also need to take an additional PCR test on that day. These PCR tests are for research and evaluation purposes only and the tests may not be processed immediately. The results of this testing will be linked with the information sent by your school. The results of the PCR tests can be provided to you if requested. You would receive results through either the school or a member of the research and evaluation team, when they are available.

Additionally, if you test positive on a LFD test, you will need to take a confirmatory PCR test. This PCR test will be registered through DHSC digital services and the result is communicated back to you through DHSC digital services. This information will be kept by the school for a minimum of 14 days and up to a month after the end of testing and by the NHS for 8 years.

Data Sharing Partners

The personal data associated with test results will be shared with

- DHSC, NHS, Public Health England – to ensure that they can undertake the necessary Test and Trace activities and to conduct research and compile statistics about Coronavirus.
- Your GP – to maintain your medical records and to offer support and guidance as necessary.
- Local Government to undertake local public health duties and to record and analyse local spreads.
- Egress – a secure online file transfer system to facilitate the transfer of research and evaluation data collected by the school to DHSC.

- Office for National Statistics (ONS) – to assist in the data collection and analysis on behalf of DHSC.
- IQVIA – to assist ONS in the data collection. IQVIA is a subcontractor of ONS for the purpose of this trial.

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 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 our Data Protection Officer if you wish to make a request by email at DPO@wearehy.com.

Should you wish to make a rights request to DHSC, you can email them at data_protection@dhsc.gov.uk

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to our Data Protection Officer. The school has an appointed Data Protection Officer, HY Education, who can be contacted in writing at HY Education, 3 Reed House, Hunters Lane, Rochdale, OL16 1YL or by telephone on 0161 543 8884 or by email DPO@wearehy.com.

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