



## Privacy Notice – COVID-19 Testing

### 1. Policy Statement

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

### 2. Ownership of the Personal Data

To enable the Covid-19 testing to be completed at Uxbridge High School, we need to process personal data for staff and students taking part, including sharing of personal data where we have a legal obligation.

Uxbridge High School is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the school to ensure we meet our public health and safeguarding legal obligations.

The personal data relating to tests for students is in accordance with paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014.

The personal data relating to staff is processed under the legitimate interest of 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.

The processing of special category personal data is processed under the provisions Section 9.2(i) of 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 someone who owes an equivalent duty of confidentiality to that data.

Data Controllorship is then passed to the Department for Health and Social Care (DHSC) for all data that we transfer about you and your test results to them. For more information about what they do with your data please see the Test and Trace Privacy Notice. Uxbridge High School remains the Data Controller for the data we retain about you.

### 3. Personal data involved in the process

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

- Name;
- Date of birth;
- Year group, if a student;
- 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;
- Test result;
- Parent/guardians contact details, if relevant and 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.

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

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

#### **5. Processing of personal data relating to positive test results**

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

We will use this information to enact the school's 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, GPs, PHE and the 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 (COPI) 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.

#### **6. Processing of personal data relating to negative test results**

We will record a negative result and the information transferred to DHSC, NHS, PHE and the 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 up to 14 days and by the NHS for 8 years.

#### **7. 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.

#### **8. 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 statistic 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.

### **9. Your rights in relation to your personal data held by us**

You have the right to request access to personal data that we hold about you, subject to a number of exceptions. To make a request for access to your personal data, you should contact the school's Main Office on 01895 234 060 or via email to [dpo@uhs.org.uk](mailto:dpo@uhs.org.uk).

Please also refer to our Data Protection Policy for further details on making requests for access to your personal data.

You also have the right, in certain circumstances, to:

- Object to the processing of your personal data;
- Have inaccurate or incomplete personal data about you rectified;
- Restrict processing of your personal data;
- Object to the making of decisions about you taken by automated means;
- Have your data transferred to another organisation;
- Claim compensation for damage caused by a breach of your data protection rights.

If you want to exercise any of these rights then you should contact Norwena Thomas, Director of Finance & Operations, Uxbridge High School, The Greenway, Uxbridge UB8 2PR.

The law does not oblige the school to comply with all requests. If the school does not intend to comply with the request then you will be notified of the reasons why in writing.

### **10. Concerns**

If you have any concerns about how we are using your personal data then we ask that you contact our Data Protection Officer in the first instance. However an individual can contact the Information Commissioner's Office should you consider this to be necessary, at <https://ico.org.uk/concerns/>.

### **11. Contact**

If you would like to discuss anything in this privacy notice, please contact:

Norwena Thomas  
Director of Finance & Operations  
Uxbridge High School, The Greenway, Uxbridge UB8 2PR