

Schools Pupil and Staff COVID-19 SELF-TESTING PRIVACY NOTICE

Penygarn Community Primary School is committed to protecting your privacy when you use our services. This Privacy Notice is designed to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards in place to protect it.

School:	Penygarn Community Primary School
Head Teacher/Data Controller:	Miss L Sellars
Privacy Notice Name:	School Pupil and Staff COVID-19 Self-testing

Data Controller:

Penygarn Community Primary School
Penygarn Road
Penygarn
Torfaen
NP4 8JR

If you wish to raise a concern about the handling of your personal data, please contact the Head teacher or Data Protection Officer using the details below;

TCBC Data Protection Officer:

Susan Bullock

01633 647467

Email: dpa@torfaen.gov.uk

To enable the Covid-19 testing to be completed at Penygarn Community Primary School we need to process personal data required for the management of tests and implementing local arrangements in the event of a positive test.

1) Who provides your data to the School?

The personal information we process is provided to us directly by you every time you use a lateral flow test.

2) How does the School collect this information:

- Test results will be provided by you upon taking the test

3) What information does the School collect about you?

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 schools COVID-19 results register will not be shared with DHSC).

The information collected will include;

- Name
- Unique code assigned to each individual test and which will become the primary reference number for the tests.
- Test results;
 - Positive test results will be used to enact our own COVID isolation and control processes without telling anyone who it is that has received the positive test.
 - We will record a negative and void result for the purpose of stock controls of tests and general performance of the testing process.

4) Why does the School process your personal data?

Under the UK General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information is:

(e) We need it to perform a public task.

5) Special categories of personal data:

We collect the following special category data;

- data concerning health

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 is supported by The Health Service (Control of Patient Information) Regulations 2002.

We do not collect any criminal data.

6) Who has access to your data?

Your data is shared internally only with the appropriate staff where it is necessary for the performance of their roles.

Your data may also be shared externally;

- Personal Data in the schools 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. School will not share its internal COVID-19 results register with 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/report-a-covid-19-test-result). The Department for Health and Social Care (DHSC) is the data controller for the information that you transfer to them about you and your test results.

- DHSC, NHS Wales, PHW – to ensure that they can undertake the necessary Test, Trace, Protect 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 Education Service, Social Care & Housing or relevant service area will not be shared with your GP.
- Local Government to undertake local public health duties and to record and analyse local spreads.

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

Apart from where previously stated, we do not pass your details to any other third parties unless we are lawfully required do so.

Is the Data transferred out of the UK?

No

7) How does the school keep your data secure?

The school has internal policies in place to ensure the data it processes is not lost, accidentally destroyed, misused or disclosed. Access to this data is restricted in accordance with the UK GDPR and will only be accessible to personnel involved in the management of tests and implementing local arrangements in the event of a positive test.

Data will be stored securely in;

- locally managed systems with appropriate access controls

Where the school engages third parties to process personal data on its behalf, they do so on the basis of written instructions. These third parties are also under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

8) How long does the school keep your data?

The school will hold your personal data only for the period that is necessary and will follow organisational and Local Authority standards in this area. At the end of the retention period the school will securely destroy or dispose of the data in line with retention schedules.

- The school will retain its test kit log and COVID-19 results register for a period of twelve (12) months from the date of the last entries made.
- Personal Data Relating to positive test results will be kept by the school for a period of twelve (12) months and by the NHS for eight (8) years.

9) Are we making automated decisions/profiling with your data?

No

Your rights

You have a number of Rights you can exercise:

- Access - to obtain a copy of your data on request
- Rectification – to require the Council to change incorrect or incomplete data
- Object, Restrict or Delete - under certain circumstances you can require the Council to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Data portability – to receive and/or transmit data provided to the Council to other organisations (this applies in limited circumstances)
- Withdraw your consent at any time (where consent has been given)
- To know the consequences of failing to provide data to the Council
- To know the existence of any Automated Decision-making, including profiling, and the consequences of this for you.
- To lodge a complaint with a supervisory authority (Information Commissioners Office)

If you would like to exercise any of these rights, please contact your Head teacher.

The Information Commissioner can be contacted at: The Information Commissioner's Office (Wales), 2nd Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH. Telephone 0330 414 6421 or e-mail Wales@ico.org.uk.