

## **Darrick Wood School – COVID-19 Testing Privacy Statement**

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

To enable the Covid-19 testing to be completed at **Darrick Wood School**, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation. **Darrick Wood School** is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the school / college to ensure we meet our public health and safeguarding legal obligations.

Personal data relating to tests for students is processed based on paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 applicable to academies.

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.

The following paragraph is relevant to both pupils and staff taking tests:

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 [a health care professional **OR** 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](#). The establishment remains the Data Controller for the data we retain about you.

### **Personal Data involved in the process**

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

- Name
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests
- Test result

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.

Please be aware that as part of the overall process, NHS track and trace may also require additional details from you.

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

The information will only be stored securely on local spreadsheets in school whilst it is needed. When students/parents/staff register their test with the NHS, schools will not have access to the information on the NHS digital service once it has been entered.

### **Processing of Personal Data Relating to Positive test results**

The positive result will be recorded in the School's system of test results. The member of staff, student or parent 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 own COVID isolation processes without telling anyone who it is that has received the positive test apart from where this is absolutely necessary to identify contacts.

Tests registered with the NHS test and trace system will mean that staff, students or parents will also receive notification of the result from that system.

### **Processing of Personal Data Relating to Negative test results**

The negative result will be recorded in the School's system of test results. We will not contact the student or parent, or staff member about a negative test result. Tests registered with the NHS test and trace system will mean that students, parents, or staff will receive notification of the result from that system.

### **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.

### **Data Sharing Partners**

We will only share anonymised data with partners

### **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 [office@darrickwood.bromley.sch.uk](mailto:office@darrickwood.bromley.sch.uk) 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 [office@darrickwood.bromley.sch.uk](mailto:office@darrickwood.bromley.sch.uk).

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