

The Peterborough School

COVID-19 Testing Privacy Statement

Ownership of the Personal Data

To enable the Covid-19 testing to be completed at The Peterborough School, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation. The Peterborough 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. All data is processed under paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 applicable to academies and Section 3 of the Non-Maintained Schools Regulations 1999 for non-maintained schools. Data Controllorship is then passed to the Department for Health and Social Care (DHSC) at the point that we transfer the data to them.

Personal Data involved in the process

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

- Name
- Date of birth (and year group)
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests
- Test result
- Parent/guardians contact details (for pupils)

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.

The information will only be stored securely on local spreadsheets in school until it is securely shared with DHSC. The Peterborough School will not have access to the information on the digital service once it has been entered.

Processing of Personal Data Relating to Positive test results

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

The School will use this information to enact their own 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 with NHS GPs, Public Health England (PHE) and Local Government who will use the 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.

Processing of Personal Data Relating to Negative test results

The Peterborough School will record a negative result and the information will be transferred to DHSC, NHS, 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/college for up to 14 days and by the NHS for 8 years.

Processing of Personal Data relating to declining a test

The School will record that you have declined to participate in a test and this information will not be shared with anyone.

Data Sharing Partners

The personal data associated with test results will be shared with

- DHSC, NHS and PHE to ensure they take the necessary actions they need to complete under their legal obligations.
- 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 your personal information.

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 the Bursar who is the School's Data Protection Officer (DPO) via email (s.dharamraj@tpsch.co.uk) or by post (The Bursar, The Peterborough School, Thorpe Road, Peterborough, PE3 6AP) 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 by writing to the DPO (The Bursar, The Peterborough School, Thorpe Road, Peterborough, PE3 6AP) or by email to s.dharamraj@tpsch.co.uk.

You can also complain to the Information Commissioner's Office (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 1111

Mr S Dharamraj
Data Protection Officer
Bursar