



Bottisham Village College
Lode Rd, Cambridge
CB25 9DL, United Kingdom
01223 811250
office@anglianlearning.org
www.anglianlearning.org

Privacy Notice for Covid-19 Testing

Under data protection law, individuals have a right to be informed about how an organisation uses any personal data that is held about them. We comply with this right by providing privacy notices to individuals whose personal data we are processing.

This privacy notice is designed to advise you about how we may seek to collect and hold additional information about you in relation to the Covid 19 Testing during the Coronavirus pandemic (Covid-19).

Such information will be limited to what is proportionate and necessary, taking into account the latest and changing guidance issued by the Government and health professionals, in order to manage and contain the virus.

Who we are

Anglian Learning is the organisation which is in charge of your personal information. This means the Academy Trust is the Data Controller.

The postal address of the Academy Trust is:

Anglian Learning
c/o Bottisham Village College
Lode Road
Cambridge
CB25 9DL

If you have queries regarding how we use your personal information you can contact our Data Protection Officer. The role of the Data Protection Officer for the Trust is being undertaken by The ICT Service. Our Data Officer at The ICT Service is Paul Stratford who can be contacted on 01480 373229 or dpo@theictservice.org.uk.

Ownership of the Personal Data you share 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). 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. For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#). The school remains the Data Controller for the data we retain about you for the management of tests and implementing local arrangements in the event of a positive test. 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.

What personal data is being collected?

The following personal data is processed by the school in relation to your test:

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

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

What is our lawful basis for processing your personal data?

We will process personal data relating to staff under:

Article 6.1(f) of the UK GDPR – it is necessary in the legitimate interest of the data controller.

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 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.

Am I required to provide my personal data under a statutory requirement?

Whilst the provision of data is not a statutory requirement and you may choose not to provide it when requested, you are strongly advised that it is in the best interests of all to provide this information to us so that we are able to take relevant steps to keep you and others safe.

The information will be managed in a confidential manner. Where Covid-19 related data is to be used for general reporting or statistics, steps will be taken to anonymise the data and general numbers used, wherever possible.

When we give your information to others

We may share your information with third parties for the reasons detailed below:

- With the Local Authority where necessary for the purpose of identifying individuals

that are high risk and vulnerable;

- Internal teams to ensure that appropriate services and support are provided to those that need it;
- With other Health Organisations and bodies engaged in disease surveillance for the purposes of research, protecting public health, providing appropriate healthcare services to the public and monitoring and managing the Covid-19 outbreak. The information will only be processed and shared in line with the requirements of the Data Protection Act 2018.

We will not share your personal data outside of the UK.

How long we keep your information and how we store it

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 school's COVID-19 results register will not be shared with DHSC). This information will only be stored securely on locally managed systems with appropriate access controls in schools and will only be accessible to personnel involved in the management of tests and implementing local arrangements in the event of a positive test. 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 by the school into them. For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#).

Processing of Personal Data Relating to Positive test results

We will use this information to enact our own COVID isolation and control processes without telling anyone who it is that has received the positive test. For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#) This information will be kept by the school for period of twelve (12) months by the school and by the NHS for eight (8) years.

Processing of Personal Data Relating to Negative and Void test results

We will record a negative and void result for the purpose of stock controls of tests and general performance of the testing process. 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 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 school will not be shared with your GP.

- Local Government to undertake local public health duties and to record and analyse local spreads.

Personal Data in the school's 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. The school will not share its internal COVID-19 results register with DHSC.

Your rights

You have these rights:

- You can ask us for a copy of the information we have about you
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although we may have good reasons why we cannot do this)
- You can ask us to limit what we are doing with your information
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

There is more information in our Data Protection Policy which is available on the Anglian Learning website <https://anglianlearning.org/financial-documents/data-protection/>

Automated Decision Making

We will not make any automated decisions from your personal data.

Complaints

We take any complaints about our processing of personal data very seriously.

If you think that our processing of personal data is unfair, misleading or inappropriate or have any concerns about our data processing please raise it with us in the first instance.

To make a complaint please contact Kathryn Oliver, Director of HR on koliver@anglianlearning.org. You can also contact our Data Protection Officer on dpo@theictservice.org.uk or by letter addressed to:

Paul Stratford
Speke House
17 Compass Point Business Park
Stocks Bridge Way
St Ives
Cambridgeshire
PE27 5JL

If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office



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Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

On line: <https://ico.org.uk/concerns/>