



Covid-19 Testing Information - what we will do with your data

As you will be aware, the Government has asked schools to carry out Covid-19 testing in order to assist with preventing the spread of the virus, and enabling as many pupils and staff to stay in school as possible. Participation in the testing programme is voluntary, and if you chose to take part, this note sets out what information the School will collect about you, why we are collecting it, and what we will do with it.

This notice should be read along with our existing privacy notices, available here:

- <https://www.hlc.org.uk/privacy/> for pupils and parents; and
- iCommunity within the HR Staff Handbook for staff.

These notices provide more general information about the School, and the rights that you have in relation to all of the information that we hold. This notice just deals with what we will do with the information collected during the Covid-19 testing process.

What we will collect

If you do not wish to participate in the testing programme, we will note this, to ensure that you are not contacted further in relation to this. We will not share this information with any other organisations without your consent.

If you do choose to take part, we will need the following information to carry out the tests:

- Name;
- Date of birth (and year group if you are a pupil);
- Gender;
- Home postcode;
- Email address and mobile number;
- Test result; and
- If you are a pupil, some additional contact details - likely to be a parent or guardian - to send the results to.

We will also assign you a unique barcode when you take the test, which will then become your personal information, as the barcode will be linked to the information above.

Why we are collecting this information

The purpose of collecting this information is to help the School plan how best to continue the education of all our pupils, whilst protecting everyone in the School from the virus. The aim is to minimise the number of people who have to self-isolate, and ensure that those who have tested positive are identified and actions taken to prevent the virus spreading further.

The actions we are taking are for the purpose of protecting the School and wider community, which is an important task that is in the interests of the public as a whole to prevent the spread of the virus as much as we can. We have to have a legal basis for the collection and use of your information for the

purposes of testing, and the legal basis we are using is that the information is *necessary for the performance of a public task in the public interest*.

Information about your health and your gender is known as "special category" information. We have to have an additional condition in place to allow us to use this information. The condition that we are relying on here, is that the information is *necessary for reasons of public interest in the area of public health*.

What we will do with the information

What we will do with the information depends upon whether the result is negative or positive.

Negative Test Results

The School will keep a record of the test result for 14 days, but will take no further action in relation to the result. We will not contact you, or your parents/guardians if there is a negative result, so if you hear nothing, you can presume that your test was negative.

This information will be shared with various government agencies who are tasked with protecting the public against the virus. The information is used by them for statistical and research purposes.

When shared, the organisation who holds the data then becomes the "owner" of it. If you have any concerns about the way that your negative test result will be used by those organisations, you should contact them. Please ask Mrs Rebecca Henriksen if you would like assistance with this.

The organisations that we will share the information with are:

- DHSC - the Department for Health and Social Care
- NHS - the National Health Service
- PHE - Public Health England
- The Local Authority.

We are sharing this information on the basis that the organisations above are using the information for an important task that is carried out in the public interest. We have to identify a legal basis in order to share the information, and the legal basis that we rely on to share the information is the same one as we are relying on to collect the test information - that the sharing of information *necessary for the performance of a public task in the public interest*.

The special condition relied upon is also the same - the information is *necessary for reasons of public interest in the area of public health*

Positive Test Results

Any positive test result will be communicated to the person nominated as the contact (likely to be your parent or guardian if you are a pupil). This will enable you to follow the latest advice on self-isolation.

The School will use the information in the same way that we use any positive test result information, as set out in our existing policies on Covid-19 as set out here <https://www.hlc.org.uk/school-policies/>.

The School will keep a record of this information for 14 days, unless there is a good reason to keep the information for longer - such as where a complaint is made about the testing process.

The School will also transfer this information to the DHSC (Department for Health and Social Care), who will use the information in accordance with their own track and trace procedures. The DHSC has its own notice explaining what will happen to your information once it is shared with them, and you can access that notice here: <https://contact-tracing.phe.gov.uk/help/privacy-notice>. You should be aware that the DHSC will also share the positive test result information with the NHS, your GP, PHE (Public Health England) and the local authority. The NHS and PHE will use the information for track and trace purposes, but also for compiling statistics and carrying out research. Your GP is provided with the information so that they can offer any additional advice and assistance required. The local authority is notified so that they can record and analyse local cases of the virus.

As above, we have to have a legal basis for the sharing of this information, and a special condition. We rely on the same legal basis and condition as we do for the sharing of the negative test information.

Your Rights

Please contact Mrs Rebecca Henriksen if you have any questions about anything in this notice. If your question relates to how DHSC or the other organisations will use your information, you may want to contact them directly.

You have the same rights in relation to this information as you do any of the information that we hold about you. More details on these, who to contact in order to exercise them, and how to complain can be found in our main notices - available here <https://www.hlc.org.uk/privacy/> for pupils and parents, and in the HR Staff Handbook on i-Community for staff.