



ST LAWRENCE COLLEGE – COVID LATERAL FLOW DEVICE (LFD) TESTING PRIVACY NOTICE

Ownership of the Personal Data

To enable Covid-19 LFD testing to be completed at the College, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation. The College 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.

If you decline a test, we record your decision, on the basis of the legitimate interest of school, in order to have a record of your decisions and to reduce unnecessary contact with you regarding testing.

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 relevant personnel, who owe a duty of confidentiality to that data.

Data Control 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 NHS Test and Trace Privacy Notice at the following link:

[Testing for coronavirus: privacy information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/testing-for-coronavirus-privacy-information)

The College 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 but we do not hold this information:

- Name
- Date of birth
- Gender
- Ethnicity
- Home postcode & first line of address (Senior School boarders use the College address)
- Parents email address and Mobile Number – pupils use personal email and mobile number unless a parent (for Junior School pupils) has completed the registration process for their child
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests-
- Test result
- Parent/guardians contact details – this information is only recorded when a parent completes the registration

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.

How we store your personal information

The information will only be stored securely on local spreadsheets in the College whilst it is needed. It will also be entered directly onto DHSC digital services for the NHS Test and Trace purposes. The College will not have access to the information on the digital service once it has been entered.

Where College devices have been used to input registration information, the data is held until the end of the testing session, after which the data is deleted from the mobile devices.

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 College and advised how to book a confirmatory PCR test.

We will use this information to enact our own COVID isolation processes, without revealing the identity of the subject who has received the positive test.

The information will be transferred to DHSC, who will share this with the NHS, GPs, PHE and the Local Government will use this 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 College for up to 14 days and by the NHS for 8 years.

Processing of Personal Data Relating to Negative test results

We will record a negative result and the information transferred to DHSC, NHS, PHE and the 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 College for up to 14 days and by the NHS for 8 years.

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

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 statistic about Coronavirus.
- 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 and analyse local spreads.

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 PA to the Bursar (bursarpa@slcuk.com) if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, please contact the Bursar (bursar@slcuk.com). You may also contact the ICO if you are unhappy with how we have used your data at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113