

## **Highbury Quadrant Primary School – School Collect Pilot: COVID-19 Testing at home for household members and members of support bubbles of staff and pupils / students in schools – Privacy Statement**

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

To provide you with Covid-19 rapid tests we need to collect and use personal data – information that is about and identifies you. This is so we can keep a log of the test kits that we have distributed.

The Department of Health and Social Care (DHSC) has commissioned the COVID-19 testing programme on behalf of the UK and are the ‘data controller’ for the purposes of Data Protection legislation. DHSC decides what information is required and how it needs to be used. The school acts a ‘processor’ of data on behalf of DHSC. You can see the full DHSC privacy notice for Testing (including how DHSC make this lawful) at [Coronavirus \(COVID-19\) testing: privacy information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/coronavirus-covid-19-testing-privacy-information).

### **Personal Data you share with DHSC**

When you do your own Covid-19 testing at home, you must report the results online to the Department of Health and Social Care (‘DHSC’). More details on online reporting can be found here - [Report a COVID-19 test result - GOV.UK \(www.gov.uk\)](https://www.gov.uk/report-a-covid-19-test-result).

DHSC is the data controller for the information that you provide 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](#)

You should read both this Privacy Statement and the DHSC COVID-19 Privacy Notice to understand how your personal data is used.

### **Test Kit Log**

The Medicines and Healthcare products Regulatory Agency (MHRA) require that the school keep a test kit log for all tests that are provided for use at home. This is so you can be contacted in the event of a batch recall, investigations, or issuing of a safety notice. The information collected is:

- First name, last name, telephone number and email address of the person collecting the test kits
- Details of lot/batch number for the test kits you receive
- First name, last name of the operator distributing the Home Test Kits

For this Test Kit Log the school is acting as a ‘processor’ of DHSC and this information will only be provided to DHSC upon request.

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

The school will keep the test kit log. This information will be stored securely and with appropriate access controls. It will only be accessible to personnel involved in the management of tests.

The school will retain its test kit log for no longer than 12 months after the test kit is provided.

DHSC will retain information for up to eight (8) years.

### **How your personal data is used**

To contact you in relation to the Test Kit Log as explained above.

Also, the DHSC use information that is provided to them when test kits are registered and when test results are reported. This helps them to understand:

- Geographic and sector distribution of test kits
- Understand registration of test kits provided vs kits received
- How we might further encourage registration
- If there are any groups, we are currently not reaching out to (distribution of self-test kits)
- Ensuring equitable uptake (across under-represented groups) of test kits.

### **Data Sharing Partners**

The School will share the test kit log with DHSC upon request.

DHSC may share personal data associated with test results with

- NHS, Public Health England (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.

### **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, if you wish to make a request, at:

Gill Auld  
Data Protection Officer for Highbury Quadrant Primary School  
Highbury New Park  
London, N5 2DP  
Email: [office@highburyquadrant.islington.sch.uk](mailto:office@highburyquadrant.islington.sch.uk)

You can contact the DHSC's Data Protection Officer at [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk)

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [Insert your organisation's contact details for data protection queries].

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