

COVID-19 PRIVACY STATEMENT FOR STUDENTS/PARENTS AND STAFF

Policy Owner Director of Operations and Finance	Applies to Prior Park Schools (Trust Wide)	Superseded documents NA
Associated documents GDPR Data Protection Policy Retention and Destruction Handbook Policy Data Protection Impact Assessment	Review frequency Every month Implementation date 1 January 2021	Legal Framework As noted in the Policy

1. Introduction

Prior Park Schools (PPS) comprises three schools. Two of those schools, Prior Park College and The Paragon School are incorporated in England and the third school, Prior Park School Gibraltar, is incorporated in Gibraltar. Both are companies limited by guarantee and registered charities.

2. Prior Park Schools Voluntary COVID-19 Testing Privacy Statement

a. Ownership of the Personal Data

To enable the Covid-19 testing to be completed at any one of the Prior Park Schools we need to process personal data for staff and students taking part, including sharing of personal data where we have a legal obligation.

Prior Park Schools is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the school(s) to ensure we meet our public health and safeguarding legal obligations.

Personal Data relating to students and staff is processed under the legitimate interest of the data controller to ensure we do what we can to minimise the spread of COVID-19 in a timely manner and enable us to continue to deliver education services safely and securely.

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

The processing of 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 a health care professional OR someone who owes an equivalent duty of confidentiality to that data.

If the test result is positive, Data Controllorship 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 Government Test and Trace Privacy Notice. The establishment remains the Data Controller for the data we retain about you.

b. Personal Data involved in the process and Consent

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

- Name
- Date of birth (and year group)
- Gender
- Ethnicity
- Home postcode
- Email address
- Mobile number
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests
- Test result
- Parent/guardians contact details (if required)

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.

We will ask for written and/or verbal consent in relation to COVID-19 testing.

c. How we store your personal information

The information will only be stored securely on local spreadsheets in the applicable school whilst it is needed. It will be password protected, and only school staff who have a legitimate reason to see the information will be given access.

If the test result is positive, it will also be entered directly onto DHSC digital services for the NHS Test and Trace purposes.

Schools will not have access to the information on the digital service once it has been entered.

d. Processing of Personal Data Relating to Positive test results

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

We will use this information to enact their own COVID-19 isolation processes without telling anyone who it is that has received the positive test, unless the school feels it imperative to inform close contacts (and complete our own track and trace process)

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 school for up to **14 days** and by the NHS for **8 years**.

e. Processing of Personal Data Relating to Negative test results

We will record a negative result internally and this information will be kept by the school for up to **14 days**.

f. 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.

g. Data Sharing Partners

The personal data associated with positive 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.

h. 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 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 Ms Emma Sandberg if you wish to make a request:

Ms Emma Sandberg
Director of Operations and Finance
Prior Park Schools
Prior Park School
Ralph Allen Drive
Bath
BA2 5AH
01225 835353

i. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the above address details.

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