



## COVID Lateral Flow Test Privacy Notice

**“Be who God meant you to be and you will set the world on fire”**

Together we are committed to excellent education for all  
rooted in Gospel values,

Inspiring a love for life-long learning and following the  
compassion of Christ.

### Commitment to Equality:

We are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

Date approved by Directors	Jan 2021
Board Review date	2022
Body responsible for review	Board Compliance Committee

This COVID Lateral Flow Test Privacy Notice has been approved and adopted by St Catherine of Siena Multi-Academy Company on xxxxx and will be reviewed in xxxx.

Signed by Director of St Catherine of Siena MAC: *F Foley*

Signed by CSEL for – Central Team: *S Horan*

Academies to which this policy relates:

Signed by Principal for – Our Lady & St Hubert’s Catholic Primary School:

Signed by Principal for – St Gregory’s Catholic Primary School:

Signed by Principal for – St Philip’s Catholic Primary School:

Signed by Principal for – St Francis Xavier Catholic Primary School:

## **DEFINITIONS**

The Company’s standard set of definitions is contained in xxxxx – please refer to this for the latest definitions.

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## **1. APPLICATION**

- 1.1. This COVID Lateral Flow Test Privacy Notice applies to you if you are an employee, worker, pupil, parent or volunteer of St Catherine of Siena Multi Academy Company (St Catherine of Siena MAC)

## **2. SCOPE**

- 2.1. An essential activity within St Catherine of Siena Multi Academy Company is the requirement to gather and process information about its pupils, staff, parents and other individuals who have contact with the school, in order to enable it to provide education and other associated functions.
- 2.2. In addition, there may be a legal requirement to collect and use information to ensure that the academy complies with its statutory obligations.
- 2.3. The GDPR defines special category information as ‘information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data’.
- 2.4. Before processing ‘special category’ information St Catherine of Siena Multi Academy Company will identify and document the lawful basis for processing this information. St Catherine of Siena Multi Academy Company will only process special categories of personal information in certain situations.
- 2.5. This will be done in accordance with Data Protection Law and other related government legislation.
- 2.6. St Catherine of Siena Multi Academy Company Board of Directors (Trustees) act as custodians of personal data and recognise their moral duty to ensure that it is handled properly and confidentially at all times, irrespective of whether it is held on paper or by electronic means. This covers the whole lifecycle of the data, including:
  - The obtaining of personal data;
  - The storage and security of personal data;
  - The use of personal data;
  - The disposal/destruction of personal data.
- 2.7. The Board of Directors delegate this duty to the Catholic Senior Executive Leader (CEO), supported by the Operations Manager
- 2.8. St Catherine of Siena Multi Academy Company has a responsibility to ensure that data subjects have appropriate access to details regarding personal information relating to them.

## **3. PRIVACY NOTICE – LATERAL FLOW TESTING**

- 3.1. This document is to read in conjunction with the NHS Test and Trace Privacy Notice available here: <https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information>.

- 3.2. No testing will be undertaken without permission being sought in the first instance to undertake the testing procedure. Once the test has been undertaken, personal data will be processed in order to progress the results and manage the process.

#### **4. OWNERSHIP OF THE PERSONAL DATA**

- 4.1. To enable the Covid-19 testing to be completed within St Catherine of Siena Multi Academy Company, we need to process personal data for staff and students taking part, including sharing of personal data where we have a legal obligation.
- 4.2. St Catherine of Siena Multi Academy Company is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by our schools to ensure we meet our public health and safeguarding legal obligations. All data is processed under Section 3 of the Non-Maintained Schools Regulations 1999. Data Controllorship is then passed to the Department for Health and Social Care [DHSC] at the point that we transfer data to them.

#### **5. PERSONAL DATA INVOLVED IN THE PROCESS**

- 5.1. We use the following information to help us manage and process the tests:
- Name
  - Date of Birth (and year group)
  - Unique barcode assigned to each individual test and which will become the primary reference
  - Number for the tests
  - Test result

#### **6. HOW WE STORE YOUR PERSONAL INFORMATION**

- 6.1. The information will only be stored securely in an electronic format at each school whilst it is needed. It will also be entered directly onto DHSC digital services for the NHS Test and Trace purposes. St Catherine of Siena Multi Academy Company will not have access to the information on the digital service once it has been entered.

#### **7. PROCESSING OF PERSONAL DATA RELATING TO POSITIVE TEST RESULTS**

- 7.1. The member of staff, student or parent will be informed only if the result is positive by the staff or students' home school, within St Catherine of Siena Multi Academy Company, and advised how to book a confirmatory test.
- 7.2. Each school will use this information to enact their own COVID isolation processes without telling anyone who it is that has received the positive test. The information will be transferred to DHSC, who will share this with the NHS. PHE and the Local Government will use this information for wider test and trace activities as well as statistical and research purposes.
- 7.3. 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.
- 7.4. This information will be kept by each school for up to 14 days and by the NHS for 8 years.

## 8. PROCESSING OF PERSONAL DATA RELATING TO NEGATIVE TEST RESULTS

- 8.1. Each school will record a negative result and the information will be transferred to DHSC, NHS, PHE and the Local Government who will use the information for statistical and research purposes.
- 8.2. 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.
- 8.3. This information will be kept by each school for up to 14 days and by the NHS for 8 years.

## 9. DATA SHARING PARTNERS

- 9.1. The personal data associated with test results will be shared with DHSC, NHS, PHE and local government to ensure they take the necessary actions they need to complete under their legal obligations.

## 10. YOUR RIGHTS

- 10.1. 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 us at the address below if you wish to make a request.**

Caroline Caddick - Operations Manager

Our Lady & St Hubert's Catholic Primary School  
Moat Road  
Oldbury  
B68 8ED

[caroline.caddick@scosmac.co.uk](mailto:caroline.caddick@scosmac.co.uk)

## **11. HOW TO COMPLAIN**

11.1. If you have any concerns about our use of your personal information, you can make a complaint to us by contacting the Trust at the above address. 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 1111

Further guidance can be found on the ICO's website which provides detailed guidance on a range of topics <https://ico.org.uk/>

## 12. ROLES AND RESPONSIBILITIES

<b>Responsibility</b>	<b>Company Role</b>	<b>Name</b>	<b>Email</b>
Senior Information Risk Owner (SIRO)	Catholic Senior Executive Leader (CEO)	Suzanne Horan	shoran@stnicholasowen-mac.org.uk
Senior Information Risk Owner (SIRO)	Operations Manager	Caroline Caddick	Caroline.caddick@scosmac.co.uk
Data Protection Officer (DPO)	ICT Network Manager	Stuart Green	Stuart.green@scosmac.co.uk