

LONDON DESIGN & ENGINEERING UTC

Privacy Notice for COVID-19 Testing at Home of Learners

Ownership of the Personal Data

To enable the Covid-19 testing to be completed at London Design & Engineering UTC, we need to process personal data, including the sharing of personal data where this is allowed under data protection legislation. London Design & Engineering UTC is the Data Controller for the data required for the management of tests and implementing local arrangements in the event of a positive test and undertaking any actions needed by school/college as part of the school/college's health (including public health), welfare and safeguarding role and obligations.

Personal data relating to tests for pupils is processed under article 6 (1) (e) of the UK GDPR (public task). This is based on the college's proprietor's official authority for the conduct of the college. Section 175 of the Education Act 2002 and paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014.

We will process personal data relating to staff under article 6.1(f) of the UK GDPR – it is necessary in the legitimate interest of the data controller.

We will process special category personal data under the provisions of article 9.2(i) of the UK GDPR, and Part 1 of Schedule 1(3) of DPA 2018 where it is in the public interest on Public Health Grounds to ensure we can minimise the spread of COVID in a timely manner and enable us to continue to deliver education services as safely and securely as possible. 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.

Personal data and Test and Trace

In the current pandemic, we may need to store your data for test and trace purposes.

This is in order for the school to engage with the test and trace process, make decisions on safety within the school and whether individuals are required to self-isolate or carry out a test. To do this we will be recording your name, contact number and date and time of arrival as well as time of departure.

To complement the above we may also ask for data that has not previously supplied. This will allow us to assess an individual's ability to attend/return to school and what measures may need to be put in place to allow for a safe return.

We, additionally, may need to collect data about individuals that you reside with in order to factor in appropriate considerations for their wellbeing.

All data collected by the school will be processed in accordance with our retention, destruction, data protection and data security policies. All data collected for test and trace purposes will be retained for 21 days in accordance with government guidelines.

The legal bases for using your data in these circumstances will be for the reasons of substantial public interest and in the interests of public health. Dependant on circumstances the basis may be to assess the working capacity of an employee or to protect the vital interests of yourself or another person.

We may need to share select data with others. This can be with the NHS and emergency services, public health, public authorities as well as other stakeholders. This will only be done where it is necessary and proportionate for us to do so.

Ownership of the Personal Data you share with DHSC

Every time you use a lateral flow test you must report the results. More details can be found here - [Report a COVID-19 test result - GOV.UK \(www.gov.uk\)](https://www.gov.uk). The Department for Health and Social Care (DHSC) is the data controller for the information that you transfer 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](#)

The college remains the Data Controller for the data we retain about you for the management of tests and implementing local arrangements in the event of a positive test.

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

Personal Data involved

The following personal data is processed by the college in relation to your test:

- Name
- Unique code assigned to each individual test and which will become the primary reference number for the tests.
- Test result

For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#)

How we store your personal information

The college will maintain a test kit log which will record against your name details of the testing kit which has been provided to you. The college may also record Personal Data about you in its internal COVID-19 test register (the school/ college's COVID-19 test register will not be shared with DHSC). This information will only be stored securely on locally managed systems with appropriate access controls in college and

will only be accessible to personnel involved in the management of tests and implementing local arrangements in the event of a positive test.

The college will retain its test kit log and COVID-19 test register for a period of twelve (12) months from the date of the last entries made by the college into them.

For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#)

Processing of Personal Data Relating to Positive test results

We will use this information to enact our own COVID isolation and control processes without telling anyone who it is that has received the positive test.

For more information about what the DHSC do with your data please see their [COVID-19 Privacy Notice](#)

This information will be kept by the college for a period of twelve (12) months and by the NHS for eight (8) years.

Processing of Personal Data Relating to Negative and Void test results

We will record a negative and void result for the purpose of stock controls of tests and general performance of the testing process.

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 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 college will not be shared with your GP.
- Local Government to undertake local public health duties and to record and analyse local spreads.

Personal Data in the college's test kit log will be shared with DHSC to identify which test kit has been given to which individual in the event of a product recall. The college will not share its internal COVID-19 test register with DHSC.

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 at our Data Protection Officer at dataservices@judicium.com 0203 326 9174 or by post to Craig Stilwell; Judicium Consulting Ltd; 72 Cannon Street, London, EC4N 6AE if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at admin@ldeutc.co.uk , or by post to London Design & Engineering UTC, 15 University Way, London, E16 2RD.

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