



The Tiffin Girls' School

Privacy Notice - COVID-19 Testing for Students and Staff

January 2021

The Tiffin Girls' School (the School) is committed to protecting your personal data and being transparent about what data is processed about you. This privacy notice applies to all students and staff, and it explains how the School collects, uses, processes and shares your personal data in relation to COVID-19 testing at the School and your rights regarding your personal data.

Ownership of the Personal Data

To enable COVID-19 testing to be completed at the School, personal data for staff and students taking part needs to be processed, including sharing of personal data where there is a legal obligation. The School is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the School to ensure public health and safeguarding legal obligations are met.

Processing of personal data relating to COVID-19 tests for students is necessary for the performance of a task carried out in the public interest. In this instance the School is complying with paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 regarding the requirement for academies to put in place arrangements to safeguard and promote the welfare of students at the school; and such arrangements have regard to any guidance issued by the Secretary of State for Education.

Personal Data relating to COVID-19 tests for staff is processed under the legitimate interest of ensuring the spread of the virus can be minimised in a timely manner and enabling the School to continue to deliver education services safely and securely.

If a staff member or student declines a test, this decision is recorded under the legitimate interest of the School in order to have a record of such decisions and to reduce unnecessary contact 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.

Data Controllorship is then passed to the Department for Health and Social Care (DHSC) for all data that the School transfers about you and your test results to them. For more information about what they do with your data please see the Test and Trace [Privacy Notice](#). The School remains the Data Controller for the data the School retains about you.

Personal Data involved in the process

The School uses 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/carer contact details (if required)

The School will only use information that is collected directly from you specifically for the purpose of the tests, even if you have previously provided this information to the School.

How your personal information is stored

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

Processing of Personal Data Relating to Positive test results

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

This information will be used to enact the School's own COVID isolation processes and the School will limit circulation of this information on a 'need to know' basis only.

The information will be transferred to DHSC, who will share this with the NHS, GPs, PHE and the Local Government who 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.

Processing of Personal Data Relating to Negative test results

The School 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 School for up to 14 days and by the NHS for 8 years.

Processing of Personal Data relating to declining a test

The School 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 the School for copies of your personal information.
- **Your right to rectification** - You have the right to ask the School to rectify personal information you think is inaccurate. You also have the right to ask the School to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask the School to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask the School 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 the School 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, the School has one month to respond to you.

To exercise any of these rights, please get in touch with the School's Data Protection Officer. See below for contact information.

If you have a concern about the way the School is collecting or using your personal data, in the first instance, please raise your concern by contacting the School's Data Protection Officer. Alternatively, you can contact the Information Commissioner's Office on 0303 123 1113 or via <https://ico.org.uk/concerns/>

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the School's Data Protection Officer:

Emma Kilburn
Deputy Headteacher and Data Protection Officer
The Tiffin Girls' School
Richmond Road
Kingston upon Thames
Surrey KT2 5PL

Tel: 020 8546 0773

Email: dataprotection@tiffingirls.org