

## COVID-19 Privacy Notice

### The information we collect about you

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.

### The uses made of your personal information

#### The legal basis on which we collect and use your personal information

To enable the Covid-19 testing to be completed at Eastleigh College, we need to process personal data for staff and learners taking part, including sharing of personal data where we have a legal obligation. Eastleigh College is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the college to ensure we meet our public health and safeguarding legal obligations (Section 175 of the Education Act 2002).

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.

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

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 Test and Trace [Privacy Notice](#). The establishment remains the Data Controller for the data we retain about you

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

#### Processing of Personal Data Relating to **Positive** test results:

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

We 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, 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.

Processing of Personal Data Relating to **Negative** test results:

We 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.

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.

### **How long we keep your personal information**

We will not keep your personal information for longer than we need it for the purposes we have explained above.

Whether your result is positive or negative your information will be held for 14 days. It will be held by the NHS for 8 years.

### **How we share your personal information**

The personal data associated with test results will be shared with:

<b>Organisation</b>	<b>Purpose</b>
Department for Health and Social Care (DHSC) National Health Service (NHS) Public Health England (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.

### **How we will store your information**

The information will be stored securely on the SimplyBook booking system that will be used by the member of staff or learner booking their test.

It will also be entered directly onto DHSC digital services for the NHS Test and Trace purposes. The College will not have access to the information on the digital service once it has been entered. For more information about what they do with your data please see the Test and Trace [Privacy Notice](#).

### **How we transfer your personal information outside Europe**

The information stored on the SimplyBook booking system is hosted on their systems in France. SimplyBook also use cloud servers based in the EU for their backups.

## **Your rights**

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>);
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information;
- the right to ask us to correct any errors in your personal information;
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information;
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information;
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you; and
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

## **Changes to our privacy policy**

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be notified to you by email.