



## **Summer Fields – COVID-19 Testing Privacy Statement**

### **Ownership of the Personal Data**

To enable the Covid-19 testing to be completed at Summer Fields, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation. Summer Fields is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the school / college to ensure we meet our public health and safeguarding legal obligations. All data is processed under Section 175 of the Education Act 2002 for maintained schools or under Section 3 of the Non-Maintained Schools Regulations 1999 for non-maintained schools. Data Controllership is then passed to the Department for Health and Social Care (DHSC) at the point that we transfer data to them.

### **Personal Data involved in the process**

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
- Parent/guardians contact details

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 information will only be stored securely on local spreadsheets in school until it is securely shared with DHSC.

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

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

The school will use this information to enact their own COVID isolation procedure, details of who has received the positive test will be kept confidential in the school community.

The information will be transferred to DHSC, who will share with the National Health Service (NHS). Public Health England (PHE) and the Local Government who will use the 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 Summer Fields for up to 14 days and by the NHS for 8 years.

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

Summer Fields 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.

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 Summer Fields for up to 14 days and by the NHS for 8 years.

### **Data Sharing Partners**

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.

### **What decisions can you make about your information?**

Under data protection law, you have rights including:

- **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 of access** - You can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;

- **Your right to erasure** - You can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- **Your right to data portability** - You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer; and
- **Your right to restriction of processing** - Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

The Operations Director [operationsdirector@summerfields.com](mailto:operationsdirector@summerfields.com) can give you more information about your data protection rights.

### **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to the Operations Director [operationsdirector@summerfields.com](mailto:operationsdirector@summerfields.com) .

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: [ico.org.uk](http://ico.org.uk).

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1111