

Purpose of processing personal data

To enable Covid-19 testing to be delivered by schools and colleges as supported by Public Health England and the Department for Education (DfE), we need to process personal data for staff and pupils taking part, including the sharing of personal data where we have a legal obligation to do so.

We are the Data Controller (owner) of the data required for processing the tests and undertaking any actions which ensure we meet our public health and safeguarding legal obligations.

Where personal data is transferred to the NHS Test and Trace, *they* are the Data Controller (owner).

Lawful basis for processing the personal data

- Paragraph 7 in Part 3 of the Schedule to [The Education \(Independent School Standards\) Regulations 2014](#)
Where the Secretary of State has issued guidance that schools are required to make arrangements to safeguard and promote the welfare of pupils
- GDPR Article 9(2)(a)
The data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- GDPR Article 9(2)(d)
Data processed under and in line with our legitimate interest to ensure we can minimise the spread of Covid in a timely manner and enable us to deliver education services safely and securely
- GDPR Article 9(2)(i)
Where processing is necessary for reasons of public interest in the area of public health as per Regulations 3(1) and 3(4) of [The Health Service \(Control of Patient Information\) Regulations 2002](#) which allows the sharing of data for COVID related purposes and where it is carried out by either a health care professional or someone who owes an equivalent duty of confidentiality to that data (as per Regulation 3(3)(a) and 3(3)(b) respectively).

Personal data involved in the process

School pupils and staff

The current guidance for schools is that lateral flow testing kits should be made available for pupils and staff. The pupil / staff member registers themselves for a test and enter information directly.

Secondary school pupils

The current guidance for schools is that on-site testing should be made available for secondary school pupils. The pupil registers themselves for a test and enter information directly.

We may assist the pupils by pre-populating their registration form on the day of the test with those categories marked with an asterisk * and verbally ask them those questions which are underlined.

This information can be uploaded via a spreadsheet and will help speed up the testing process and prevent delays or crowding.

The categories in grey, italicised font are *not* mandatory.

- unique barcode assigned to each individual test and which will become the primary reference number for the tests *
- date / time of test *
- name*
- date of birth (and year group for pupils) *
- gender *
- *ethnicity*
- *NHS number*
- country *
- home postcode *
- first line of address *
- whether you currently have coronavirus symptoms
- whether you know when they started
- email address for receiving results *
- *contact number for receiving results (where applicable)*
- test result
- *parent / guardian contact details (if required)*

Staff only

We will internally record the following information about a designated representative: -

- name of individual
- work email address
- work mobile telephone number (if they have one)

Sharing and processing of personal data

Where testing is performed at home, the school should be informed of the result

The result of the Lateral Flow Test is matched with a unique barcode and should be reported to NHS Test and Trace www.gov.uk/report-covid19-result

How the school will use and store the personal information

We will record the result of any test in a register. Positive test results will be used to enact our local arrangements and control processes. Any negative and void results are recorded for the same reasons and may also assist with managing any testing kit stock levels.

The register will be stored securely on locally managed systems with appropriate access limited to

those staff involved in the management of the testing.

This information will not be held longer than 12 months from the date of the last entry into the register (which is of course dependent on the pandemic and how long the testing continues).

Other use and storage of the personal information

The school does not have access to any information transferred to NHS Test and Trace. This is processed by them and the information will be held by the NHS for 8 years

We have been informed that NHS Test and Trace data may be shared with: -

- The Department of Health & Social Care and Public Health England
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; *and*
- Local Government (London Borough of Enfield)
To undertake local public health duties and to record and analyse local spreads of coronavirus

More information about NHS Test and Trace is available at the following website

www.gov.uk/guidance/nhs-test-and-trace-how-it-works

Right to request access to personal data

Parents / pupils / staff have the right to request a copy of the personal information our academies holds about them.

This is known as a '*subject access request*' and both this process and how this can be accessed is fully explained in our **Data Protection Policy** available on the policy page of our website.

Anyone wishing to make a subject access request may do so by contacting the academy office or our Data Protection Officer. **Please see the 'contacts' section below.**

Please note

Staff wishing to make a subject access request for personal information which the DfE process should be made directly to them

www.gov.uk/contact-dfe

Anyone wishing to make a subject access request for personal information which the NHS process should be made directly to them: -

www.gov.uk/government/publications/nhs-covid-19-app-privacy-information

Anyone wishing to make a subject access request for personal information which the London Borough of Enfield process should be made directly to them: -

<https://new.enfield.gov.uk/contact-us/ask-for-information-we-have-about-you/>

Anyone wishing to make a subject access request for personal information which their GP may hold should be made directly to them

Other rights of individuals

In addition to above and subject to some legal exemptions which may prevent us from facilitating your request, parents and pupils have certain [data protection rights](#). They have the right to: -

- have their personal data rectified, if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of their personal data (i.e. permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific / historical research and statistics
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on them

These rights are further explained in our [Data Protection Policy](#) available in the policy section on our website. www.heronhallacademy.org.uk/Policies

Anyone wishing to exercise these rights request may do so by contacting the academy office or our Data Protection Officer. **Please see the 'contacts' section below.**

Contacts

If anyone wishes to discuss anything in this privacy notice or has any concerns about how we are collecting or using their personal data, you should raise your questions with us in the first instance.

School offices

	020 8805 9811 heights@northstartrust.org.uk	www.enfieldheightsacademy.org.uk
	020 8443 9631 heron@northstartrust.org.uk	www.heronhallacademy.org.uk
	020 8344 9890 kingfisher@northstartrust.org.uk	www.kingfisherhallacademy.org.uk
	020 8804 4126 woodpecker@northstartrust.org.uk	www.woodpeckerhallacademy.org.uk

North Star Community Trust Data Protection Officer

information.access@northstartrust.org.uk

Should we not be able to provide a satisfactory answer or if you wish to see independent advice about data protection you may contact the Information Commissioner's Office (ICO) directly: -

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
0303 123 1113
www.ico.org.uk