



## PRIVACY NOTICE

### Westcountry Schools Trust<sup>1</sup> – COVID-19 Testing at home of pupils and students in Secondary Schools and Colleges

To enable the Covid-19 testing to be completed at schools in the Westcountry Schools Trust<sup>1</sup>, we need to process personal data, including the sharing of personal data where this is allowed under data protection legislation. Westcountry Schools Trust 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 an individual school as part of the individual school 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 Trust's official authority for the conduct of the individual school as Section 175 of the Education Act 2002 and paragraph 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 for independent schools including Academy Schools and Alternative Provision Academies are also relevant.

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 someone who owes an appropriate duty of confidentiality to that data.

#### **Ownership of the Personal Data you share with Department of Health and Social Care**

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/government/news/report-a-covid-19-test-result). 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 Trust remains the Data Controller for the data individual schools 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.

WeST Privacy Notice – COVID LFT – Pupil Home – Secondary – Feb 2021

<sup>1</sup> Westcountry Schools Trust members as listed in Annex A

### **Personal Data involved**

The following personal data is processed by the school 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**

Each school will maintain a COVID test kit log which will record against your name details of the testing kit which has been provided to you. Each school will also record Personal Data about you in its internal COVID-19 test register (the school COVID-19 test register will not be shared with DHSC). This information will be stored securely on locally managed systems with appropriate access controls in individual schools and will only be accessible to personnel involved in the management of tests and implementing local arrangements in the event of a positive test.

Individual schools will retain its COVID 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 individual school 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 ensuring confidentiality for 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 [school/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 may be shared with

- DHSC, NHS, Public Health England (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 school 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 school/college's COVID 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 school 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 [DPO-West@westst.org.uk](mailto:DPO-West@westst.org.uk) if you wish to make a subject access request. To help us complete your request in a timely manner please complete the subject access request form at: [Westcountry Schools Trust - General Data Protection Regulation \(GDPR\)](https://www.westst.org.uk/General-Data-Protection-Regulation-GDPR) ([westst.org.uk](https://www.westst.org.uk))

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Data Protection Officer  
Westcountry Schools Trust  
Harford Road  
Ivybridge  
PL21 0JA

Email: [DPO-West@westst.org.uk](mailto:DPO-West@westst.org.uk)

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

## Annex A

Westcountry Schools Trust Member	Site Address
Callington Community College	Launceston Road, Callington, Cornwall. PL17 7DR
Coombe Dean School	Charnhill Way, Elburton, Plymouth. PL9 8ES
Dunstone Primary School	Shortwood Crescent, Plymstock, Plymouth. PL9 8TQ
Hele's School	Seymour Road, Plympton, Plymouth. PL7 4LT
Holbeton Primary School	The Square, Holbeton, Devon. PL8 1LT
Ivybridge Community College	Harford Road, Ivybridge, Devon. PL21 0JA
Oreston Community Academy	27 Oreston Road, Plymstock, Plymouth. PL9 7JY
Plymstock School	Church Road, Plymstock, Plymouth. PL9 9AZ
Sherford Vale School	Hercules Road, Sherford, Plymouth. PL9 8FA
Stowford School	Exeter Road, Ivybridge, Devon. PL21 0BG
Wembury Primary School	Knighton Road, Wembury, Plymouth. PL9 0EB
Woodlands Park Primary School	Abbot Road, Ivybridge, Devon. PL21 9TF
Yealmpton Primary School	Stray Park, Yealmpton, Plymouth. PL8 2HF
The Learning Institute	Victoria Beacon Place, Station Approach, Victoria, Roche, Cornwall. PL26 8LG
Boringdon Primary School	Courtland Crescent, Plympton, Plymouth. PL7 4HJ
Chaddlewood Primary School	Hemerdon Heights, Plympton, Plymouth. PL7 2EU
Glen Park Primary School	Glen Road, Plympton, Plymouth. PL7 2DE
Plympton St Maurice Primary School	Plympton Hill, Plympton, Plymouth. PL7 1UB
Woodford Primary School	Litchaton Way, Plympton, Plymouth. PL7 4RR
Ashburton Primary School	Whistley Hill, Ashburton, Newton Abbot. TQ13 7DW
Atrium Studio School	Balland Lane, Ashburton, Devon. TQ13 7EW
Buckfastleigh Primary School	Bossell Road, Buckfastleigh, Devon. TQ11 0DD
South Dartmoor CC	Balland Lane, Ashburton, Devon. TQ13 7EW