

Privacy Notice – COVID-19 Testing



1. Definitions

Data controller - A controller determines the purposes and means of processing personal data. For the purposes of this Privacy Notice, Bradford Grammar School is the data controller.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person. For the purposes of this Privacy Notice the data subjects are pupils, parents and carers.

Special categories personal data - The General Data Protection Regulation ("GDPR") refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Bradford Grammar School is an outstanding UK independent grammar school, which believes in providing every opportunity for its Junior and Senior pupils. We embrace academic, sporting and creative excellence within an aspirational, caring environment, which builds on our heritage while looking to the future. We nurture exciting and fulfilling lives shaped by our School's traditional values and believe happiness is the key to an individual's success. We are at ease with excellence. Our Charity registration number is 529113, and we are registered at Bradford Grammar School, Keighley Road, Bradford, BD9 4JP.

3. What is Personal Data?

Personal data is information which relates to a living individual and from which he or she can be identified either directly or indirectly through other data which the firm has or is likely to have in its possession. These individuals are sometimes referred to as data subjects. Personal data does not include information about companies and organisations.

4. Ownership of Personal Data

To enable the Covid-19 testing to be completed at Bradford Grammar School, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation. Bradford Grammar 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 we meet our public health and safeguarding legal obligations. All data is processed under Section 175 of the Education Act 2002 for 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.

5. 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)
- Gender

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- 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 use this information specifically for the purpose of the tests.

6. What is the lawful basis on which we will use this information?

We need to process this information for the following lawful reason:

- where the processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights or freedoms. We also have a legitimate interest and public health requirement within the Covid 19 testing process

7. How we store your Personal Data

For this specific purpose the School will take data previously collected and securely stored within SIMS, the school information database (please see the Pupils and Parents Privacy statement) and enter it, with the test information, on local spreadsheets in school until it is securely shared with 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.

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

9. Processing of Personal Data Relating to Negative test results

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

10. 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

11. 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

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- 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 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 dataprotection@bradfordgrammar.com if you wish to make a request.

If you have a concern about the way we respond to your request or wish to complain about this or how we are collecting or using your personal data, we request that you raise your concern with us in the first instance at dataprotection@bradfordgrammar.com or, without prejudice, you have the right to lodge a complaint direct to the Information Commissioner's Office if you have any concerns in relation to our information rights practices via <https://ico.org.uk/concerns/>. The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5A. Helpline number: 0303 123 1111

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