



POLICY DOCUMENTS

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Person responsible	Bursar
Comments to	Bursar
Last reviewed/updated	January 2021
To be reviewed/updated	August 2021
Reason for review/update	New Policy
Person reviewing/updating document	Bursar
Source/Author of document	Bursar
Implementation of the policy	Dissemination to staff, pupils and parents as attachment to Covid 19 testing consent form.



Covid 19 Testing – Privacy Notice

1. Introduction

- **Scope.** This policy outlines how Kingham Hill School is committed to protecting your personal data. The notice is addressed to all staff, parents and pupils. This Privacy Notice tells you why we need to collect personal information about you, what we will do with it, and how we will look after it. It also tells you about your legal rights in relation to your Personal Data. If you have any questions about this privacy notice, please contact us. Contact details are provided below.

2. Why are we testing

- Kingham Hill School has been directed by the Department for Education to deliver asymptomatic testing for staff and pupils which will allow us to better identify asymptomatic Covid 19 cases so that only those identified as positive will need to self-isolate.

3. How your personal data is collected (Information we will hold)

- The School will need to maintain a record of staff or pupil and parent names, contact details including telephone and email addresses together with the test results.

4. How we use your personal data

- We use your Personal Data to record the results of any tests and to contact parents of any pupils who have a positive test result. All personal information relating to the tests will be held securely in School and destroyed after 14 days.

5. Legal basis for collecting and using your personal data

- The lawful basis for processing your personal information according to the General Data Protection Regulation (GDPR) and Data Protection Act 2018 is: The School's safeguarding powers under Section 175 Education Act 2002 for schools. This does not in any way impact on an individual's right to consent to having the test. This allows the School to make the necessary decisions in the best interests of the person taking the test and wider school community without further relying on consent about how we process personal data. GDPR Article 6(1)(e) – the processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a health service.

5. Data processing outside Europe

- Your data will not be shared outside the EEA.

6. How long your information will be kept

- We will keep your Personal Data for as long as is necessary to record and report the test results. The data will be held securely in the School and will be destroyed 14 days after the test.

7. Your rights

- The Data Protection Act 2018 provides you with a number of legal rights in relation to your Personal Data, including the right:
 - To request access to your Personal Data
 - To request correction of your Personal Data that is wrong or incomplete
 - To request erasure or the restriction of processing of your Personal Data
 - To request the transfer of your Personal Data in a structured; commonly used machine-readable format
 - Not to be subject to automated decision making
 - To withdraw your consent.
- If you wish to exercise any of the rights set out above, or require further information about any of the rights, please contact us.

8. Contacting us

- If you have any questions or comments about this privacy notice, the School's Data Compliance Officer can be contacted at:

Data Compliance Officer
Kingham Hill School
Kingham
Oxfordshire
OX7 6TH
dco@kinghamhill.org

9. Complaints

- You have the right to complain about how we treat your Personal Data and Sensitive Personal Data to the Information Commissioner's Office (ICO). The ICO can be contacted at:

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

10. Changes to this notice

- The School may update this Privacy Notice from time to time. We will notify you of the changes where we are required by law to do so.

Catriona Thompson

Last reviewed: January 2021

To be reviewed: August 2021