

HCUC – COVID-19 Testing Privacy Statement

Ownership of the Personal Data

To enable Covid-19 testing to be completed at HCUC, we need to process personal data for staff and students taking part, including sharing of personal data where we have a legal obligation. HCUC is the Data Controller for the data required for processing the tests and undertaking any actions which are needed by the college to ensure we meet our public health and safeguarding legal obligations.

If you decline a test, we record your decision under the legitimate interest of the college in order to have a record of your decisions and to reduce unnecessary contact with you regarding testing.

The processing of special category personal data is processed under the provisions Section 9.2(i) of GDPR, where it is in the public interest on Public Health Grounds. 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 a health care professional or someone who owes an equivalent duty of confidentiality to that data.

Data Controllorship is then passed to the Department for Health and Social Care (DHSC) for all data that we transfer about you and your test results to them. For more information about what they do with your data please see the Test and Trace [Privacy Notice](#). The establishment remains the Data Controller for the data retained by HCUC about you.

Personal Data involved in the process

HCUC will use the following information to help manage and process the tests:

- Name
- Date of birth
- Gender
- Ethnicity
- 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)

HCUC 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.

How your personal information is stored

The information will only be stored securely on local spreadsheets in HCUC whilst it is needed. It will also be entered directly onto DHSC digital services for the NHS Test and Trace purposes. Colleges will not have access to the information on the digital service once it has been entered.

Processing of Personal Data Relating to Positive test results

The member of staff, student or parent (depending on contact details provided) will be informed of the result by the College and advised how to proceed.

HCUC will use this information to enact its 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 this with the NHS, GPs. PHE and the Local Government will use this 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 HCUC for up to 14 days and by the NHS for 8 years.

Processing of Personal Data Relating to Negative test results

HCUC will record a negative result and the information 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 HCUC for up to 14 days and by the NHS for 8 years.

Processing of Personal Data relating to declining a test

HCUC will record that you have declined to participate in a test and this information will not be shared with anyone.

Data Sharing Partners

The personal data associated with test results will be shared with

- DHSC, NHS, PHE – 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
- Local Government to undertake local public health duties and to record and analyse local spreads.

Your Rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask HCUC for copies of your personal information.

Your right to rectification - You have the right to ask HCUC to rectify personal information you think is inaccurate. You also have the right to ask HCUC to complete information you think is incomplete.

Your right to erasure - You have the right to ask HCUC to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask HCUC 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 HCUC transfer the personal information you gave to HCUC 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, HCUC has one month to respond to you.

If you wish to make a request, please contact HCUC at:

Data Protection Officer
HCUC - Uxbridge Campus
Park Road
Uxbridge UB8 1NQ
Tel: +44 (0) 1895 853311
Email: dpo@hcuc.ac.uk

How to complain

If you have any concerns about the use of your personal information by the college, you can make a complaint to the Data Protection Officer, HCUC.

You can also complain to the ICO if you are unhappy with how HCUC has used your data.

The ICO's address:

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

Helpline number: 0303 123 1113