

Privacy Notice for PCR Testing

Background

The Scottish Government/NHS Test and Protect, in partnership with the UK Department of Health and Social Care, is responsible for the overall delivery of COVID-19 Testing. The testing of asymptomatic people can help identify positive cases, break chains of transmission and reduce risks in the community. If you choose to take part in testing, NHS/NSS is the Data Controller of test information and is responsible for the secure servers which receive and store test data.

More information about how NHS/NSS use this information can be found at:

www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information/testing-for-coronavirus-privacy-information--2

or

Use of your data for COVID-19 Testing | Information Governance (scot.nhs.uk)

Scope of this privacy notice

The Council are supporting testing of participating staff by collecting consent forms from them, issuing test kits and instructions to participants, maintaining a 'Test Kit Log' and collecting tests to send to the NHS/NSS.

This privacy notice covers this limited processing of personal data by the Council. It provides you with information about how your personal data will be collected and used in connection with COVID-19 PCR testing.

Who am I giving my personal data to?

If you decide to participate in this process, you will be asked to complete a consent form and return it along with your first test. You will also be asked to read this Privacy Notice carefully so you are clear how your personal information will be used by the Council.

The Council must also record who takes a test kit in a Test Kit Log, which will contain the following information:

- your name,
- your designation
- your team
- date test kits issued
- date first test kit returned
- date second test kit returned.
- Confirmation that tests have been registered.
- test kit barcode.

The Council is the Data Controller of this Test Kit Log. The Council does not have access to test results or the NHS/NSS database unless you ask us to administer your results on your behalf as outlined below. Although the Council stores the barcode number, this is an identifier for the NHS to record how many people from a particular geographical area have been tested. The Council has no access to this information.

If you test positive you should advise your line manager for absence and contact tracing purposes, and any processing of this information by schools will be in line with applicable data protection legislation.

In some limited cases, staff without access to a device may wish to use a dedicated secure Council email address, established for this purpose. If you wish to do this, the Council will process your test results on your behalf and pass those on to you. This is the only circumstances in which the Council will have access to test results and will be at your own request.

What is the purpose of processing my personal data?

Providing the PCR data is voluntary and aims to enable you to administer the COVID-19 tests directly without relying on a test centre.

What happens if I choose not to provide the personal data requested?

Participation in PCR testing is voluntary.

What is the lawful basis for collecting, storing and using my data?

UK General Data Protection Regulation (GDPR) Article 6(1)(e) (lawful basis to permit the processing of personal data) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authorities vested in the data controllers.

UK GDPR Article 9(2)(i) (lawful basis to permit the processing of special category data) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross border threats to health.

How will my personal data be shared?

Your personal data will only be shared with specific parties as part of this processing and on a need- to-know basis.

Information about PCR tests may be provided to the Scottish Government in an aggregated and anonymised format for the evaluation of the effectiveness of this testing, including operational performance, clinical and public health effectiveness.

How long will my personal data be kept?

The test kit log will be kept for as long as is required to support NHS Scotland initiatives to fight COVID -19.

Where is my personal data stored?

Your data will be stored securely within the Council network and safely accessed by authorised parties. We will not share your personal data outside the United Kingdom.

Is my personal data kept private and secure?

We have legal duties to keep information about you confidential. Strict rules apply to keep your information safe and comply with the Data Protection Act 2018, UK GDPR and organisational Data Protection policies. Further information on how the Council uses personal information can be found at dataprotection@renfrewshire.gov.uk