

COVID-19 Testing Privacy Notice



The Department of Health and Social Care has implemented a COVID-19 national testing programme for those defined as 'essential workers'. This privacy notice is applicable to all staff and residents, as we have determined to carry out bi-weekly COVID-19 priority antigen tests to confirm who currently has COVID-19. The result of the test will enable our staff and or people in their household to know whether they need to self-isolate and or when it is safe to return to work. It will also inform arrangements for supporting residents who may contract COVID-19.

The Department of Health and Social Care has commissioned the virus testing programme on behalf of the UK and will determine the purposes of data protection legislation in regards to the undertaking of the test, collection of the results, and sharing these results with people who have undertaken the test. While the Department of Health and Social Care will decide what information is required from you in order to undertake the test, and how it needs to be used, Country Court will be Controller for the sole purpose of retaining the test results and determining what action to take in direct response to the results of your test.

1) Controller contact details	Country Court Millennium House Werrington Peterborough PE4 6ZN
2) Data Protection Officer contact details	Joe Rice Email: DPO@countrycourtcare.com Telephone: 01733 571951
3) Personal data collected	The details you may be required to provide are: <ul style="list-style-type: none">• first and last name• date of birth• sex• mobile phone number• email address• address (including postcode)• vehicle registration number (if you are taking a test at a regional test site)• NHS Number (for English residents and only if you know it – Wales/Scotland/NI residents may need to provide a different local identifier, which will be specified upon registering for a test)• National Insurance (NI) Number• other household members' first and last names
4) Purpose of the sharing	To enable us determine whether you need to self-isolate and or when to return to work after such self-isolation.
5) The Lawful conditions for processing	In order that we can carry out processing of your personal data, we need a lawful basis to do so. The lawful basis for processing, storing and sharing this data are: The General Data Protection Regulation, Article 6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

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	<p>In addition, an Article 9 Condition for processing should be adhered to:</p> <p>The General Data Protection Regulation, Article 9(2)(h) the processing is necessary for medical diagnosis, the provision of health treatment and management of a health and social care system.</p>
6) Recipient or categories of recipients of the shared data	<p>The data will be shared with Country Court’s Reception team who are the first recipients of the test results you send to the dedicated email address for COVID-19 testing; with the line management of staff up to and including the Board of Directors; and with the appropriate personnel in the People Team on a need to know basis. Residents’ test results may be shared with the appropriate Operations Team.</p>
7) Right to object	<p>You have the right under Article 21 of the GDPR to object to your personal information being processed. Please contact us if you wish to object to the processing of your data. You should be aware that this is a right to raise an objection which is not the same as having an absolute right to have your wishes granted in every circumstance. You will need to provide information on your specific circumstances which relate to the reasons you are objecting.</p>
8) Right to access and correct	<p>You have the right to access any identifiable data that is being shared and have any inaccuracies corrected.</p>
9) Retention period	<p>Your information will be stored in line with the Records Management Code of Practice for Health and Social Care 2016. This means we will keep your information for up to 8 years before we dispose of it. In some circumstances, for example where we are legally required to, we may keep your information for a longer period of time. Similarly, if the information is no longer required before the 8-year statutory provision mentioned, we may delete this information at such time as it is no longer required.</p> <p>Information that identifies you will be stored securely and processed in the UK. We will ensure that there are appropriate security safeguards including strong cyber security.</p> <p>Information that does not, and cannot, identify you may be stored and processed outside of the UK. For example, information purely about the number of tests conducted, or the number of outcomes from tests.</p>
10) Right to Complain.	<p>You have the right to complain to the Information Commissioner’s Office, using this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website).</p>