



Cox Green School – Covid-19 Testing Privacy Statement

Ownership of the Personal Data

To enable the Covid-19 testing to be completed at Cox Green School, we need to process personal data for staff and pupils taking part, including sharing of personal data where we have a legal obligation. Cox Green 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 or under Section 3 of the Non-Maintained Schools Regulations 1999 for non-maintained schools]. Data Controllershship is then passed to the Department for Health and Social Care (DHSC) at the point that we transfer data to them.

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)
- Unique barcode assigned to each individual test and which will become the primary reference number for the tests
- Test result
- Parent/guardians contact details

We will only use information that is collected directly from you specifically for the purpose of the tests, unless you have previously provided us with this information.

The information will only be stored securely on local spreadsheets in SCHOOL until it is securely shared with DHSC.

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 school and advised how to book a confirmatory test.

The school will use this information to enact their own COVID isolation processes without telling anyone who it is that has received the negative 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.

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.

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.

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 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 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 enquiries@coxgreen.com, 01628 629415 or Cox Green School, Highfield Lane, Maidenhead, SL6 3AX if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at enquiries@coxgreen.com, 01628 629415 or Cox Green School, Highfield Lane, Maidenhead, SL6 3AX.

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

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1111

Storing this information

We hold staff data for the following retention periods:

Data Set	Retention
Unsuccessful job candidates	Date of appointment of successful candidate + 6 months
Records leading up to the appointment of a new Headteacher	Date of appointment + 6 years
Records leading up to the appointment of new member of staff – successful candidate	All relevant information is added to the staff HR file – see below
Staff HR file	Year of termination of employment + 6 years
Pre- employment vetting information – DBS checks	The school does not keep copies of DBS certificates. If copies are made for any reason they are not retained for more than 6 months.
Proof of identity	Year of termination of employment + 6 years
Evidence proving the right to work in the UK	Year of termination of employment + 6 years
Performance Management and Appraisal records	Year of termination of employment + 6 years
Identity Management and authentication	Date of leaving + 1 month
Catering and Biometrics	Date of leaving +1 year
Pay, benefits & Timesheets	Current year + 6 years
Financial information	6 years +1
Images and video	Year of termination of employment + 6 years unless for historical archive purposes
CCTV	2 months
Allegation of child protection against a member of staff	Until the persons normal retirement age or 10 years from the date of allegation whichever is the longer then review. <i>NB allegations found to be malicious are removed from personnel files</i>
Records relating to accident/injury at work	Date of the incident + 12 years. In case of serious accidents a further retention period will be applied.
Accident reporting	Date of the incident + 6 years

Who we share School Workforce information with and why

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

Who we share data with	Why We share data	Transferred to 3 rd country	Contact details
3 rd party organisations in any TUPE transfer process	Personal data will need to transfer to new employer. Pension providers - Berkshire Pension Fund (BPF) for the Local Government Pension Scheme (LGPS) – Teachers Pension Scheme		http://www.berkshirerpensions.org.uk/ https://www.teacherspensions.co.uk/
Achieving for Children	Children’s Services		www.achievingforchildren.org.uk
Atlantic Data DBS service	We share information for the completion of DBS pre-employment checks that are a statutory requirement.		www.atlanticdata.co.uk
Cisco Systems Inc.	Meraki WiFi	√	www.meraki.cisco.com
Civica	Finance system		www.civica.com
Cox Green’s external Legal Services provider – Shared Legal Services (SLS - legal services at Wokingham Borough Council)	Data is shared when legal advice is sought or a legal defence is required.		http://www.selectbusinessservices.co.uk/schools-and-education-providers/legal-solutions/
Department for Education (DfE.)	We share personal data with the Department for Education (DfE.) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment. We are required to share information about our pupils with the (DfE.) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and		www.gov.uk/government/organisations/department-for-education

	amendments.		
Disclosure and Barring Service	We share information on a statutory basis.		www.gov.uk/government/organisations/disclosure-and-barring-service
Educare	We share data to enable the provision, set up, monitoring and record keeping of training records	√	www.educare.co.uk
EPM	We share personal data for all HR processes before and during and after employment for data validation, issue resolution and HR advice and guidance on all HR administration, HR Management, policies, procedures and processes.		www.epm.co.uk
Genie	Appraisal and training data		www.geniesuite.co.uk
Groupcall Limited	Emerge, Xpressions, IDaaS, Messenger, XoD, Xporter		www.groupcall.com
Health and Safety Executive	Where it is a requirement under RIDDOR Regulations accident details will be shared and discussed with the HSE, Health and safety advisors and Line Managers.		http://www.hse.gov.uk/
I-Connect	Data is shared via this software to transfer data from the LGPS to Berkshire Pension Fund		https://www.iconnectdata.co.uk/
Innovate	Cashless Catering		www.innovatefood.co.uk
Istek	Private fund Manager		www.istekuk.com
Lloyds Bank	Lloyds Link BACS payment system		www.lloydsbank.com
McIntyre Hudson	Data is shared with the schools internal and external audit service - to ensure compliance with internal controls and external regulations		www.macintyrehudson.co.uk
National College of Teaching & Leadership	Part of statutory pre-employment checks before and during employment. And during inspections to demonstrate compliance with employment practices and referrals where there is concern about professional conduct or performance		www.gov.uk/government/organisations/national-college-for-teaching-and-leadership
National Fraud Initiative	Data is shared in order to identify cross organisational fraud. Covers areas such as multiple employments, those in receipt of pension and salary, those in receipt of benefits and salary etc.		https://www.nfi.gov.uk/
National Governors Association (NGA)	Governance support service		www.nga.org.uk
Office of National Statistics	Data shared to satisfy the requirements of statutory returns. This is mostly anonymised but may include individual details.		https://www.ons.gov.uk/
Ofsted			https://www.gov.uk/government/organisations/ofsted
OH Works Occupational Health Services	For the provision of advice and guidance on Occupational Health Management, policies, procedures and processes		www.ohworks.co.uk
Papercut	Print management system		www.papercut.com
Pension providers – LGPS administered by Berkshire Pension Fund, TPS, Prudential – AVC provider	3 rd party for administration of contributions and payment of pension benefits.		www.berkshirerpensions.org.uk www.teacherspensions.co.uk https://www.pru.co.uk/rz/localgov/
Recognised Trade Unions	Data is shared to meet statutory consultation requirements		https://www.unison.org.uk/ https://www.gmb.org.uk/ http://www.naht.org.uk/ https://neu.org.uk/ https://www.ascl.org.uk/
Royal Borough of Windsor and Maidenhead	We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.		www.rbwm.gov.uk
RBWM Health and Safety Department	We share personal data for the investigation of accidents and for the provision of advice and guidance on H and S Management, policies, procedures and processes.		www.rbwm.gov.uk
Royal Borough of Windsor and Maidenhead Human Resources department	We share personal data for all HR processes before and during and after employment for data validation, issue resolution and HR advice and guidance on all HR administration, HR Management, policies, procedures and processes.		www.rbwm.gov.uk
RBWM Payroll dept.	In order to legally and accurately process payroll and deductions		www.rbwm.gov.uk

HMRC DWP HM Courts and Tribunal Service			HMRC https://www.gov.uk/government/organisations/hm-revenue-customs DWP https://www.gov.uk/government/organisations/department-for-work-pensions HM Courts and Tribunal Service https://www.justice-ni.gov.uk/topics/courts-and-tribunals
RPA – Government Insurance Provider	Data will be shared to manage litigation and comply with insurance conditions.		www.gov.uk/guidance/academies-risk-protection-arrangement-rpa
Semantise Ltd	First Class hosted by Semantise		www.semantise.com
SIMS Personnel & SIMS.net	3 rd party HR system software provider - are given access to our database for; helpdesk call resolution, issue resolution, system development consultancy and reporting		www.capitaeducationsoftware.co.uk
Smoothwall Ltd	Smoothwall Secure Web Gateway Web Filter and Unified Threat Management		www.smoothwall.com
Sodexo	Data is shared with 3 rd party benefit suppliers that the employee has chosen to sign up to e.g. child care vouchers	√	https://uk.sodexo.com/home.html
sQuidcard Limited	sQuid Cashless Catering		www.squidcard.com
Tassomai Ltd	Tassomai	√	https://www.tassomai.com/
Thames Valley Police	We share information where the safeguarding of students is required or criminal activity is suspected		www.thamesvalley.police.uk
Various 3 rd parties requesting earnings confirmation for mortgages, loans etc	At the request of the employee		
Various 3 rd parties requesting references or continuous service date confirmations	Data is shared when potential new employers request a reference or details of employment		
Veale Wasborough Vizards	Data is shared when legal advice is sought or a legal defence is required.		www.vwv.co.uk
Zurich Municipal Insurance	Data will be shared to manage litigation and comply with insurance conditions.		https://web.zurich.co.uk/municipal/

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required

- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department’s data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Business Manager in writing.

You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR, and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact:

Data Protection Officer: Suzanne Martin, RBWM. Email: DPA@rbwm.gov.uk Tel: 01628 796945

The Information Commissioner’s Office at <https://ico.org.uk/concerns/>

Further information

If you would like to discuss anything in this privacy notice, please contact:

Suzanne Martin	Data Protection Officer, RBWM	Concerns about Cox Green Schools Data Protection procedures; Reporting of breaches of Data Protection	DPA@rbwm.gov.uk 01628 796675
Cathrin Thomas	Headteacher, Cox Green School	For general information on how we use your data	enquiries@coxgreen.com 01628629415
Gill Newman	Business Manager, Cox Green School	For queries relating to this privacy notice; object to the processing of personal data; prevent processing for direct marketing; object to decisions being taken by automated means; to have inaccurate data rectified; to request data is erased or destroyed; to report a breach of Data protection regulations.	g.newman@coxgreen.com 01628 629415
Tom Smith	IT Systems and Network Manager, Cox Green School	For queries relating to this privacy notice; object to the processing of personal data; prevent processing for direct marketing; object to decisions being taken by automated means; to have inaccurate data rectified; to request data is erased or destroyed; to report a breach of Data protection regulations.	t.smith@coxgreen.com 01628 629415