

National Covid19 Testing Programme Privacy Notice

The UK Government is rolling out a Covid-19 testing programme to people in Northern Ireland – this testing programme has been commissioned by the Department of Health and Social Care (DHSC) in England. This Privacy Notice provides a broad description of the way the Public Health Agency in Northern Ireland processes your personal information. For further details about the UK wide testing programme and to understand how your own personal information is processed, you may wish to refer to communication on the testing booking portal websites:

<https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested>

<https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information>

<https://www.nhs.uk/conditions/coronavirus-covid-19/testing-for-coronavirus/ask-for-a-test-to-check-if-you-have-coronavirus/>

National Covid19 Testing Programme

The UK government is rolling out a coronavirus testing programme, and you have chosen to book a home test or a test at a regional test site, mobile unit or via the satellite service if you are a staff member or resident in a care home.

The test will confirm whether you currently have coronavirus. This is so that you can:

- take the right steps to look after yourself
- protect others
- know if you are fit and well to return to your critical role
- potentially reduce the amount of time you have to self-isolate for.

Once you have taken the test, your sample will be analysed in a laboratory, and you will be informed of the result (positive, negative, or unclear) by text or email. You will be given advice on any next steps that need to be taken following your result.

Your test result will also be sent to a central database, along with other information relating to coronavirus, to enable health and social care organisations to respond to coronavirus. Your result will also be sent to your electronic health care record.

Why are you processing my personal information?

As the UK Government has commissioned the UK wide testing programme, the DHSC is the data controller for the following purposes:

- confirming the appointment to the regional test site or mobile test unit (if that is where you are having your test)
- performing a security and ID verification at the regional test site
- receiving and processing your test
- returning your results to you
- sharing your results with NI health bodies to inform local planning and responses to coronavirus
- for sharing data with BSO ITS to link your test result to your Electronic care record (ECR) and to analyse data in relation to coronavirus
- undertaking quality assurance of the testing process, for example clinical process assurance
- analysis to support operational decisions to improve the full end-to-end testing process, such as:
 - day-to-day use, for example whether someone attended their appointment
 - to inform regional test sites of improvements to the testing process, for example to manage capacity or throughput
 - support end-to-end logistics planning

When your results are returned to Northern Ireland, the Public Health Agency assumes responsibility as the Data controller and carries out the following activities:

- surveillance - to identify trends in the COVID 19 disease outbreak and to prevent/control spread;
- contact tracing – to enable us to contact you to provide advice if appropriate and to seek information on others that you have been in contact with, so that they can be alerted to be aware and take the necessary steps to prevent further transmission.
- analysis – for health research, health protection and health promotion and for reports and the production of official statistics;
- research into coronavirus – including potentially being invited to be part of clinical trials

Information provided by you, and collected about you, in relation to testing for coronavirus will not be used for any purpose that is not linked to coronavirus.

What information is collected?

In HSC we take your privacy seriously and we only collect the information we need to. Staff will only access your information on a 'strict need to know' basis when they are involved in supporting the Covid19 pandemic.

Information may include you or those that require testing:

- first and last name
- address
- postcode
- date of birth
- sex
- mobile phone number
- email address,
- national insurance number
- vehicle registration number (if you are taking a test at a regional test site)
- health and care number (so that we can make sure your test result gets stored in your electronic care record (ECR)).

The lawful basis for processing your personal information according to the General Data Protection Regulation (GDPR) and Data Protection Act 2018 is:

- 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
- GDPR 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
- Data Protection Act 2018 – Schedule 1, Part 1, (2) (2) (f) – Health or social care purposes

Other organisations involved in processing your data will be doing so either with an agreement in place with DHSC to provide that service, or with a legal basis of their own (such as NHS Digital). A range of laboratories may be involved in analysing your test sample and informing you of the result.

Serco are the organisation that manage the test sites and they will have access to your name and car registration for accessing the site.

The Business Services Organisation (BSO) will process your information when it is returned to Northern Ireland (under an agreement the PHA has with BSO). Information is also shared with the Department of Health in Northern Ireland for the purposes of Covid-19 monitoring.

Do I need to give my consent?

The data is obtained on a lawful basis as outlined above and therefore you do not need to give consent.

Tests are completely voluntary, and you do not have to take it, but are encouraged to do so.

Where do you get my personal data from?

Much of the personal data we use will be obtained directly from you. You will provide this when you are booking a test (or someone is booking on your behalf) and when you are registering on the Radox laboratory site in order to obtain your result (or someone is registering for your test result on your behalf).

Do you share my personal data with anyone else?

Yes. To help us provide the best service for you, we may need to share your information with other healthcare bodies and professionals, including GPs and Hospitals, for the purposes of health protection. Non identifiable data may also be shared with Public Health England for the purposes of national disease surveillance.

Sometimes, we may share some information with external organisations such as universities, auditors and survey/research organisations etc. As far as possible, information collected for research or to help identify trends in disease will be used in a way that does not identify you personally.

Do you transfer my personal data to other countries?

Only in exceptional circumstances, e.g. where information needs to be shared with Public Health agencies outside the UK for the purposes of disease surveillance and to protect the health of individuals and others potentially affected by an outbreak.

Any transfers will be made in full compliance with GDPR and only when we have a legitimate basis for doing so.

How long do you keep my personal data?

We will only retain your data for as long as necessary, in line with our Retention and Disposal Schedule and specific guidance issued by the Department of Health in Northern Ireland (Good Management, Good Records – available [here](#)).

What rights do I have?

- You have the right to obtain confirmation that your data is being processed, and access to your personal data.
- You are entitled to have personal data rectified if it is inaccurate or incomplete.
- You have a right to have personal data erased and to prevent processing, in specific circumstances.
- You have the right to 'block' or suppress processing of personal data, in specific circumstances.
- You have the right to data portability, in specific circumstances.
- You have the right to object to the processing, in specific circumstances.
- You have rights in relation to automated decision making and profiling.

How do I complain if I am not happy?

If you are unhappy with any aspect of this privacy notice, or with how your personal information is being processed, please contact the Data Protection Officer at the following address:-

Data Protection Officer:

Ms Rosemary Taylor
Public Health Agency, 12-22 Linenhall Street, Belfast, BT2 8BS
Tel: 028 9536 3519
Email: dpo.pha@hscni.net

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Email: casework@ico.org.uk
<https://ico.org.uk/global/contact-us/>
<https://ico.org.uk/global/contact-us/>

Changes to this Privacy Notice

This Privacy Notice will be kept under regular review and any updates will be placed on our website.

May 2020