

COVID-19 Lateral Flow Test (LFT) Asymptomatic Staff Testing

Privacy Notice

A programme has been initiated in Northern Ireland for healthcare staff to carry out self-testing for coronavirus using a Lateral Flow Device (LFD). As part of this you are asked to record the result of your test via an online portal at <https://www.gov.uk/report-covid19-result>

IMPORTANT: If you receive a positive test, you must immediately report the result to your organisation, either via your occupational health department, line manager or as per local guidelines. This must be done in addition to any online results reporting.

Some questions and answers you may have about this test programme:

1) What information do I need to share for this testing?

The following personal information may be requested when logging your test result on the online portal:

- first and last name, address, postcode, gender, ethnicity, date of birth, sex, mobile phone number, email address, H&C number

2) Who is the Data Controller for my information?

As the data is processed through the UK-wide testing programme, the Department of Health and Social Care (DHSC) is the data controller for the following purposes:

- receiving and processing your test result as reported by 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), forward this on to the contact tracing centre as appropriate, 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.

When your results are returned to Northern Ireland, the Public Health Agency (PHA) assumes responsibility as the Data Controller and carries out the following activities as required:

- 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.

3) What is the legal basis to use my information?

The law on protecting personal information, known as the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, allows us to use your personal information as described above.

We process both personal data and special categories of personal data, particularly data about your health, for this purpose. The sections of the UK GDPR and the Data Protection Act that apply are:

- UK GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest
- UK 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
- UK GDPR Article 9(2)(i) – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health
- UK GDPR Article 9(2)(j) – processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
- Data Protection Act Schedule 1, Part 1, (2) (2) (f) – Health or social care purposes
- Data Protection Act Schedule 1 Part 1 (3) – public health
- Data Protection Act Schedule 1 Part 1 (4) – research

4) 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.

5) How long we keep your information

The **organisation issuing the tests** will retain the Test Kit Log for a maximum of 24 months from the date of collection. This retention schedule is based on the expiry date of the test.

6) Your rights over your information

Under data protection law, you have several rights over your personal information.

- you have the right to ask for a copy of any information about you that we use
- you have the right to ask for any information we hold about you that you think is inaccurate to be changed
- you have the right to ask for the use of your information by us to be restricted, for example, where you think this information is inaccurate

For information on how you can exercise your rights for any of the devolved administration Public Health agencies, please visit their respective privacy notices:

Public Health Agency Northern Ireland <https://www.publichealth.hscni.net/privacy-notice>

7) What if there is a problem?

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/>

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Changes to this Privacy Notice

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

Revised January 2022