

Privacy Notice – Lateral Flow Testing Device at Home Testing Kit distribution

Edinburgh College is providing you with this information to comply with data protection law and to ensure that you are fully informed and we are transparent in how we collect and use your personal data.

Who is collecting the information?

Edinburgh College is the Data Controller. We have an appointed Data Protection Officer (DPO), Alice Wilson, who can be contacted by emailing: DataProtection@edinburghcollege.ac.uk

Why are we collecting it and what are we doing with it (Purpose)?

This privacy notice covers the processing of personal data of staff and students by the College relating to distribution of the LFD home testing kits.

Background

The Scottish Government (NHS Test and Protect), in partnership with the UK Department of Health and Social Care (DHSC), Local Authorities and the NHS Scotland, is responsible for the overall delivery of COVID-19 Lateral Flow Device Testing (LFD) of staff and students in Scottish Colleges. The testing of asymptomatic people can support education settings to identify positive cases, break chains of transmission and reduce risks in settings.

Scope and what personal data do we collect?

The College will only collect and use your information for the following purposes:

- Collection of your name and the date you were provided with a Lateral Flow Device (LFD) at home testing kit by the College.
- Collection of a contact email address or phone number in case we need to contact you about any issues with the test kits
- Collection of a consent form to agree to participate in the programme for under 18 year olds
- Recording of the above information on a Test Kit Log.
- Sharing of the Test Kit Log with NHS (Scotland) in relation to the monitoring of take up of home testing kits.

The purpose of the processing is to identify positive cases of COVID-19 and reduce transmission to other people. The aim is to ensure the health and safety of all individuals who attend the College in any capacity. The College is required to record and report the number of home testing kits issued to the DHSC to support their monitoring of uptake among staff and students.

The College does not collect any special category (sensitive) data about you for this process.

Taking part in the LFD testing is voluntary. If you choose to take part, you will be asked to provide name and contact details (and a consent form for under 18s signed by their parent / guardian / carer), and provide a personal signature, when on site at the College. You can decide not to participate at any time, as it is a matter of personal choice.

Any results from tests are entered directly into the Government portal by yourself, the College are not notified or have access to these individual results. Any positive tests should be reported according to the Staff / Student absence / Covid reporting procedures.

The lawful basis for the processing

GDPR Article 6 (1)(e) processing is necessary for the performance of a task carried out in the public interest or in the or in the exercise of official authority vested in the controller.

Who we share the information with:

Your data will only be shared with DHSC, NHS Scotland when they contact the College in relation to the distribution of LFD testing at home kits.

For further privacy information refer to:

- [Use of your data for COVID-19 Testing | Information Governance \(scot.nhs.uk\)](https://www.scot.nhs.uk/information-governance/using-your-data-for-covid-19-testing)
- [Coronavirus \(COVID-19\): Testing in Scotland | NHS inform](https://www.nhs.uk/conditions/coronavirus-covid-19/testing-in-scotland)
- [How the NHS handles your personal health information | NHS inform](https://www.nhs.uk/conditions/how-the-nhs-handles-your-personal-health-information)

How long do we hold the personal data?

The Test Kit Log and 'Consent to participate form' will be kept for 12 months following the end of the lateral flow testing programme. Your information will then be destroyed securely in line with College procedures.

Individuals' rights in relation to this processing

The following rights are rights of data subjects:

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

The following rights apply only in certain circumstances:

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data. Contact: icocasework@ico.org.uk