

Key worker testing privacy notice

You have been invited to undertake a coronavirus priority virus test because you or someone in your household is a critical worker and is currently following government guidelines on self-isolation.

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

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

You will be phoned to arrange your testing appointment and to confirm the site that you are to visit.

- Tests are completely voluntary, and you do not have to take it. If you do decide to take a test, then you need to follow the instructions provided by your employer. Testing will take place at a regional testing site (Bristol Airport), a local testing site (University Bristol's Hospital (UHB)/ North Bristol Trust Testing Centre (NBT)) or possibly at your home.

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 inconclusive) by text and/or phone. You will be given advice on any next steps that need to be taken following your result. Your employer will be informed of the booking request outcome, but not the test result. It is your responsibility to inform your employer and follow your organisations process/policy.

Within Bristol, North Somerset and South Gloucestershire, key worker testing nominations are being co-ordinated by the Staff Testing Local Co-ordination Centre (LCC) run by BrisDoc Healthcare Services, commissioned by Bristol, North Somerset and South Gloucestershire Clinical Commissioning Group.

Your organisation sends your details to the LCC, for streaming to the correct test site. This information is held securely within BrisDoc and access to this information is tightly governed, in line with Data Protection requirements.

Data Controller

NHS England South West have commissioned the regional co-ordination process and regional testing facility.

At different points in the process, different organisations will have Data Controller status, depending on what they are doing with your information e.g. Your Organisation submitting the test request and the Testing Centre Organisation performing the tests and feeding back results to you.

Other organisations will also carry out parts of the virus testing programme. These organisations are known as Data Processors e.g. Staff Testing Local Co-ordination Centre (LCC) run by BrisDoc Healthcare Services who co-ordinate test requests.

Each organisation will require a different level of information about you, but all will use the minimum necessary to do what they are required to by the Data Controller.

What personal data we collect

Currently, your employer will contact you, inviting you to take a test to see if you currently have coronavirus. The test is voluntary, and you do not have to take it.

If you decide to take a test, then you need to follow the instructions your employer has given you and your employer will request an appointment at a test site.

The details we may need from you are:

- Local Coordination Centre Request Date
- Requesting Organisation
- Organisation Contact Name
- Organisation Contact Email
- Organisation Contact Telephone Number
- LCC Organisation (always BNSSG CCG)
- Staff member's Name
- Mobile Number (this is the person who will be tested)
- Index case name (this is the person who will be tested)
- Index Case DOB
- Index Case Age
- Anticoagulants Prescribed
- Requires Transport or Home Test because unable to travel
- Other notes

The Regional test centre will require additional information for example your vehicle registration number to support access to the testing site.

How we use your information in the testing programme

If you have registered for an appointment at the regional test centre, your details will be captured in a database, and passed to the team running the site, so they can check who you are on arrival. At UHB/UHB your details will be used to identify you, manage the testing process and to enable the hospital to link your test results back to your GP record.

Once you have 'checked-in' and your ID has been validated, you will take the test, and the unique reference number on the kit will be logged.

The test centre will take the sample, analyse it and provide your test result to you via a text or a phone call. along with supporting information and next steps.

Purposes your information will be used for

The testing centre is the Data Controller for the following purposes:

- confirming the appointment to the test site
- performing a security and ID verification at the test site
- receiving and processing your test
- returning your results to you
- for individuals tested at UHB/NBT your test result will be linked to your GP record
- 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
- day to day use, for example whether someone attended their appointment
- to inform test sites of improvements to the testing process, for example to manage capacity or throughput
- support end to end logistics planning

Data Processors and other recipients of your data

Organisations who use your data and information on behalf of a Data Controller can only do so with clear instructions from them. They cannot use your data and information for any other purpose.

Any use of information that is not covered by the instructions from the Data Controller would be unlawful, unless the Data Controller agrees and provides written permission to do this.

The Staff Testing Local Co-ordination Centre testing centre hosted by BrisDoc is the Data Processor for the following purposes:

- validating and streaming requests to the correct test site
- Feeding back test request outcomes to the originating employer organisation
- Producing aggregated reports to the CCG on test site utilisation and requests to support logistics planning and improvement

Your information used for other purposes

Your information may also be used for different purposes that are not directly related to your health and care. These include:

- planning of services or actions in response to coronavirus

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.

Wherever possible, information that does not directly identify you will be used for these purposes, but there may be times when it is necessary for your personal data to be used.

Any releases of information that identify you will be lawful and the minimum necessary for that purpose.

This information may be collected from various health and care organisations and may be given to other health and care organisations responding to coronavirus.

Legal basis

The legal basis for processing your personal data 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 to provide that service, or with a legal basis of their own (such as NHS Digital).

Your rights under Data Protection Act 2018 and GDPR

By law, you have a number of rights as a data subject, such as the right to access information held about you.

This testing programme does not take away or reduce these rights, so you can still request (for example), from the organisations named in this notice, copies of the information they hold about you.

If you are unhappy or wish to complain about how your information is used as part of this programme, you should contact the relevant organisation in the first instance to resolve your issue.

If you are still not satisfied, you can complain to the [Information Commissioners Office](#).

Retention and storage of your information

Your information will be stored in line with the [Records Management Code of Practice for Health and Social Care 2016](#). This means organisations will keep your information for up to 8 years before it is disposed of it. The LCC will retain information for a shorter period of time .

Information that identifies you will be stored securely, and processed in, the UK.

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.

Data Protection Officer

The Data Protection Officer for BrisDoc Healthcare Services is Nigel Gazzard (Managing Director)

List of Data Controllers and Data Processors for the testing programme

Data Controllers

- Your organisation
- Regional Testing Centre (coordinated by NHS England Southwest)
- UHB
- NBT
- BrisDoc Health Care Services

Data Processors

- Deloitte, who operate some of the regional test sites
- BrisDoc Staff Testing LCC

Each organisation that processes your information must provide you with information about how they do this. This should be publicly available on their website or can be requested from them.