



1. Home (<https://www.gov.uk/>)
 2. Health and social care (<https://www.gov.uk/health-and-social-care>)
 3. Public health (<https://www.gov.uk/health-and-social-care/public-health>)
 4. Health protection (<https://www.gov.uk/health-and-social-care/health-protection>)
 5. Infectious diseases (<https://www.gov.uk/health-and-social-care/health-protection-infectious-diseases>)
 6. Coronavirus (COVID-19) testing: privacy information
(<https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information>)
- Department of Health & Social Care (<https://www.gov.uk/government/organisations/department-of-health-and-social-care>)

Guidance

Testing for coronavirus: privacy information

Updated 16 April 2021

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Introduction

The government has rolled out a coronavirus (COVID-19) testing programme and you have chosen to book a home test or a test at a regional test site. This test will confirm if you currently have coronavirus.

You can register for a test online (<https://self-referral.test-for-coronavirus.service.gov.uk/antigen/name>).

If you have difficulties accessing the online system, you can register for a test by calling 119 from England, Northern Ireland and Wales or 0300 303 2713 from Scotland.

The test will confirm whether you currently have COVID-19. This is so that you can:

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

This test should not be used for the purpose of international travel. You can purchase a private test if required. This is to ensure that those requiring a test have access to one.

You must inform your employer if you test positive for COVID-19 because they will need to take action to support you and manage any impact on the organisation (such as inviting others you work closely with to be tested). If there is reasonable evidence that you contracted COVID-19 from a work-related exposure your employer is obliged to report this to the Health and Safety Executive, as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

There are different types of test you can take. These tests can be self-administered, carried out by yourself, or staff-administered, carried out by a member of staff, depending on the test chosen. You may be sent additional instructions about the site that you're visiting. NHS staff may be invited to an NHS site, such as a hospital, where facilities are available.

You may receive a home testing kit if you and the people you live with are in an outbreak area. You will need to register the home testing kit online using the instructions provided.

The test is completely voluntary. You can cancel the test that you've booked if you no longer need it. If you do decide to take a test, then you need to follow the instructions provided. As part of the registration process, we will send you a confirmation email with the details of your order or booking. If you are attending a test site, it is necessary to bring this with you.

Please note that if you access our service using your NHS login details, the identity verification services are managed by NHS Digital. See NHS Login's Privacy Notice and Terms and Conditions (<https://access.login.nhs.uk/terms-and-conditions>). This restriction does not apply to the personal information you provide to us separately.

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 and/or email. You will be given advice on any next steps that you should take following your result. If you test positive, your data will be sent to contact tracing.

If you live in England, your data will be sent to NHS Digital, who send the data that identifies you to Public Health England and to the Test and Trace data platform within the Department of Health and Social Care (DHSC), and a central database held by NHSX and controlled by NHS England. All

information in these databases is held securely and access to this information is tightly governed, in line with data protection requirements.

For residents in Wales, Scotland and Northern Ireland, your health bodies or national government have requested NHS Digital to collate test results for your country, so they can be sent to the relevant public health body in your country to aid their response to COVID-19.

For more detailed information regarding the testing programme, or for details of who is processing data on behalf of **DHSC** go to coronavirus (COVID-19) getting tested (<https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested>).

Data controller

The **DHSC** has commissioned the COVID-19 testing programme on behalf of the UK and will be data controller for the purposes of Data Protection legislation. **DHSC** decides what information is required and how it needs to be used.

DHSC are consulting and involving the Welsh, Scottish and Northern Irish governments, who may have their own testing processes specific to their area (along with country-specific information relating to COVID-19). Links to this information can be found in the Residents in Wales, Scotland and Northern Ireland section.

At different points in the process, other organisations including research organisations may also have data controller status, depending on what they are doing with your information.

Other organisations will also carry out parts of the COVID-19 testing programme on behalf of **DHSC** but can only act on instructions provided to them by **DHSC**. These organisations are known as data processors. An example of such an organisation is Amazon, who will support the actions involved with delivering test kits to people's homes.

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 controller.

See the data controllers and data processors section for a full list.

What personal data we collect

We collect the following data from you:

- first and last name
- date of birth
- gender
- ethnicity
- landline and mobile phone number
- email address
- home and delivery address, including postcode
- vehicle registration number
- National Insurance number

- NHS number, if known (for English residents. Wales/Scotland/Northern Ireland residents may need to provide a different local identifier, which will be specified upon registering for a test)
- details and date of onset of symptoms
- vaccination status
- your NHS login account identifier (if you access our services using your NHS login details)
- recent travel history (for example, whether you travelled overseas in the last 14 days and the country you spent most time in)
- employment details
- other household members' details, if you are ordering or booking a test for them as well
- whether you tested positive more than 90 days ago

After your COVID-19 test, we will also collect and process your test results (positive, negative or unclear), so that we can inform you of your result and what steps you should take next.

The testing programme

There are a number of home test kit suppliers and their processes may vary slightly depending on which test kit you receive.

If you have registered for a home test or have been sent out because you're in an outbreak area, then your name and address will be passed to Amazon, who will deliver the testing kit. The kit will have a unique reference number. Once you have self-administered the test, you will need to follow the instructions on the kit. Completed test kits will be collected by a courier or need to be posted via a priority post box and delivered to a laboratory for analysis.

If you have registered for an appointment at the regional test site, you will receive a QR code which will be scanned when you arrive at the site to check you should be there. When you take the test, you will need to register the kit barcode to you before returning it. Completed tests will then be sent to the laboratory for analysis.

The laboratory will analyse the sample and provide your test result to NPEX. The lab does not receive any of your personal data, only the specimen ID from the test kit and the lab attaches the result to the specimen ID. NPEX will link your registration record with your test result and pass this information onto NHS Business Services Authority, who will inform you of your result by text and/or email. NPEX will also:

- send results to NHS Digital, so they can collate data and information for each of the UK countries
- link the result to your GP record (for English residents), by receiving your GP details from NHS Digital or PHE and using a product called Keystone (provided by EMIS Health) to send results to your GP. Where NPEX can't match the record, NHS Digital will try to. This will enable your GP to be informed of your test result without you needing to do anything.

For Welsh, Scottish and Northern Irish residents, your results will be returned to Public Health Wales, NHS National Services Scotland and Northern Ireland public health bodies respectively, enabling them to respond to COVID-19.

You must self-isolate to stop the virus from spreading. Self-isolate if you:

- have any symptoms of coronavirus (a high temperature, a new, continuous cough or a loss or change to your sense of smell or taste)
- test positive for COVID-19 or are a close contact of someone who tests positive
- live with someone who has symptoms or tested positive
- find out that someone in your support bubble has symptoms or tested positive
- are told to self-isolate by NHS Test and Trace or the NHS COVID-19 app
- arrive in the UK from a country with a high coronavirus risk – see how to self-isolate when you travel to the UK (<https://www.gov.uk/government/publications/coronavirus-covid-19-how-to-self-isolate-when-you-travel-to-the-uk>)

If you have been instructed to self-isolate by NHS Test and Trace, we will regularly contact you by phone and text during this period to provide advice and support and check you are self-isolating.

If you tell us you need help to self-isolate, the following data will be passed to your local authority:

- your name
- address at which you are self-isolating
- contact details
- information about when you were instructed to self-isolate

Your local authority will investigate further to find out if you need support with self-isolating or have a reasonable excuse not to self-isolate. Reasonable excuses include:

- seeking medical assistance
- obtaining basic necessities such as food or medicine if there is no other way to obtain them
- accessing social services or other important public services
- avoiding a risk of harm
- attending the funeral of a close family member
- carrying out a legal obligation such as attending court
- accessing veterinary services

A police force may request information from NHS Test and Trace directly, where they are investigating a report of someone who may not be complying with the mandatory self-isolation period. Where applicable, we will share with them the following data:

- your name
- address at which you are self-isolating
- contact details
- information about when you were instructed to self-isolate
- whether you have tested positive for COVID-19 or are a close contact of someone who has

We do not share details with the police of all people who have been instructed to self-isolate. We only share information with them in response to specific requests about individuals who may be breaking the self-isolation duty.

If you test positive for COVID-19:

- you may be contacted by **DHSC** a few weeks after the date of your result to be invited to take an antibody test. This test is also voluntary, and you do not have to take it. If you do decide to take an antibody test, you will be invited to register for a test that is similar to this one – please follow the instructions given to you when you register
- you may also be contacted by **DHSC** via email or text message to see if you wish to donate blood plasma as part of the potential treatment for coronavirus
- your information will be passed to contact tracing

If you test positive or negative, you may also be contacted by **DHSC** to see if you wish to contribute to the research effort of COVID-19. If you are interested in doing this, you need to follow the link in the text message.

Purposes your data will be used for

DHSC is the data controller for the following purposes:

- confirming the appointment to the test site
- performing a QR code check at the test site
- receiving and processing your test
- returning your results to you
- contacting you (if you test positive) as part of the government contact tracing programme
- sharing your results with Welsh/Scottish/Northern Irish health bodies (if you live in that country) to inform local planning and responses to COVID-19
- sharing results with Public Health England (if you live in England) to help plan and respond to COVID-19
- sharing your vaccination status with Public Health England (if you live in England) to understand the effectiveness of COVID-19 vaccines, including their effectiveness against different strains of the COVID-19 virus, and, where appropriate, to ask you to do a repeat test and/or an antibody test
- sharing your self-isolation status with your local authority (if you live in England) to verify any application you may have made for a self-isolation support payment
- sharing your self-isolation status with your local authority (if you live in England), to enable them to provide support and guidance to you if you are self-isolating. If there is evidence to suggest you are not complying with the duty to self-isolate without reasonable justification, your local authority may pass this information on to local police to investigate further. This may lead to enforcement action being taken against you, which could include you being fined. Local authorities may also share data with third-party organisations such as charities for support purposes
- sharing your self-isolation status with relevant police forces to support mandated self-isolation periods and any enforcement action that may result (if you live in England)
- sharing your COVID-19 test result with your local hospital, if you are booked in for elective surgery (via your Summary Care Record). This only applies if you have taken a test and you have a Summary Care Record
- sharing your results with NHS Digital to analyse data in relation to COVID-19 (if you live in England)

- undertaking quality assurance of the testing process (for example, clinical process assurance)
- instructing the data processors to share data for research purposes. The data processor will have appropriate data security to manage this data
- monitoring the flow of test data across the NHS Test and Trace systems to ensure that the tests being submitted to laboratories flow across the systems and are processed – known as test flow monitoring
- for 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, manage capacity or throughput)
 - supporting end-to-end logistics planning

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. Wherever possible, this will be done using information that does not identify you (anonymous data). These include:

- research into COVID-19 (including potentially being invited to a research project)
- service evaluation of new COVID-19 diagnostic products
- planning of services or actions in response to COVID-19
- monitoring the progress and development of COVID-19

Information provided by you, and collected about you, in relation to testing for COVID-19 will not be used for any purpose that is not linked to controlling the spread of COVID-19.

There may be times when it is necessary for your personal data to be used. Any release of information that could identify you will be lawful and the minimum necessary for that purpose.

NHS Digital is required, under law, by ~~DHSC~~ and NHS England to collect, analyse and share information and data relating to COVID-19, when this information is requested by other health and care organisations or researchers. This information may be collected from various health and care organisations and may be given to other health and care organisations responding to COVID-19 as well as research organisations conducting research on COVID-19.

If you live in England or Wales, your permission is not always required for your data to be used to contact you to ask if you would like to participate in health research. For example, the law permits this to happen where it is approved by the Secretary of State or the Health Research Authority so that approved medical research can take place. You may therefore still be invited to participate in coronavirus vaccine studies without your permission where the law allows this, but this does not mean that you have to participate.

If you live in Northern Ireland, Scotland or Wales you can find links to this information in the Residents in Wales, Scotland and Northern Ireland section.

Data processors and other recipients of your data

Organisations who use your data and information on behalf of a controller, can only do so with clear instructions from the controller and cannot use your data and information for any other purpose. Any use of information that is not covered by the instructions from the controller would be unlawful, unless the controller agrees and provides written permission to do this.

DHSC have appointed data processors to:

- register your test
- schedule appointments and capture information at the point of testing
- check your QR code on site
- check your identity as part of ordering a home test (this is not a credit check and does not affect your credit score)
- oversee the logistics of test kit deliveries
- link your personal details (provided on registering for the test) to the test result
- forward your test results, email address and phone number to NHS Business Services Authority to send you your test results
- receive data to enable your results and supporting information to be communicated back to you by text and email, along with supporting information
- ensure your test data is being processed properly

Services on behalf of DHSC may be provided by different organisations in different regions and a full list of data processors can be found in Annex 8.

Legal basis under GDPR and Data Protection Act 2018

DHSC's 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 the management of health/social care systems or services
- GDPR Article 9(2)(i) – the processing is necessary for reasons of public interest in the area of public health
- 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).

Your rights as a data subject

GDPR

By law, you have a number of rights as a data subject and this testing programme does not take away or reduce these rights.

These rights are:

- your right to get copies of your information – you have the right to ask for a copy of any information about you that is used
- your right to get your information corrected – you have the right to ask for any information held about you that you think is inaccurate to be corrected
- your right to limit how your information is used – you have the right to ask for any of the information held about you to be restricted, for example, if you think inaccurate information is being used
- your right to object to your information being used – you can ask for any information held about you to not be used. However, this is not an absolute right and we may need to continue using your information. We will tell you if this is the case
- your right to get information deleted – this is not an absolute right and we may need to continue to use your information. We will tell you if this is the case.

If you're unhappy or wish to complain about how your personal data is used as part of this programme, you should contact [DHSC](#) in the first instance to resolve your issue. [DHSC](#) may have to work with partner organisations to resolve your complaint (for example, if you have a complaint about Randox test kits, then [DHSC](#) would work with Randox to resolve this).

If you're still not satisfied, you can complain to the Information Commissioner's Office (<https://ico.org.uk/>).

Retention and storage of your data

We will retain your personal data for up to 8 years, in accordance with the Records Management Code of Practice for Health and Social Care 2016 (<https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>), but will dispose of your data sooner if it's appropriate to do so. For Welsh, Scottish and Northern Ireland residents, please see Residents living in Wales, Scotland or Northern Ireland for country-specific information on retention of records.

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 [DHSC](#) is Lee Cramp, who can be contacted by sending an email to data_protection@dhsc.gov.uk.

List of data controllers and data processors

Data controllers for the testing programme are:

- [DHSC](#)
- NHS England – who manage the central database where results go to, enabling organisations to respond to COVID-19
- NHS Digital – for:

- giving NPEX access to your NHS number and your registered GP details (from NHS Digital's Personal Demographics Service) so that your test result can be sent to your GP
- sending information on residents of Wales, Scotland and Northern Ireland, to Public Health Wales, NHS National Services Scotland and Northern Ireland public health bodies (respectively), who have requested NHS Digital to process information relating to their resident population for COVID-19
- managing the 'Ask for a coronavirus test service' on the NHS.UK website for test booking for members of the public
- linking your result to your GP record if NPEX cannot match details with confidence
- NHS Digital is the controller for any personal information you provided to NHS Digital to get an NHS login account and verify your identity, and uses that personal information solely for that single purpose. For this personal information, DHSC's role is a "processor" only and we must act under the instructions provided by NHS Digital (as the "controller") when verifying your identity.
- Public Health England – when they receive results and use them to plan their response to COVID-19 and for contact tracing.
- local authorities – when they use your self-isolation status to help administer the Self-Isolation Support Payment schemes and to assess support required to help individuals to self-isolate
- police forces in England – when they use your information to help investigate and enforce any non-compliance with mandated self-isolation periods
- research organisations – when receiving data to carry out research with relation to COVID-19

A list of data processors for the testing programme can be found in Annex 8.

Residents living in Wales, Scotland or Northern Ireland

If you live in Wales, Scotland or Northern Ireland, further information about how your government will use your information (which is specific to each country) can be found here:

- Wales (<http://www.wales.nhs.uk/sites3/home.cfm?orgid=950>)
- Scotland (<https://www.informationgovernance.scot.nhs.uk/testing-for-covid19-privacy-information/>)
- Northern Ireland (<https://www.publichealth.hscni.net/covid-19-privacy-information>)

Annex 1: care home testing

As the government has increased the capacity to test the population, testing is also being rolled out care homes and similar places of residence, such as:

- residential homes
- nursing homes
- hospices – including hospice at home services
- children's homes managed by a local authority

The list is not exhaustive, and the term 'home' is used here to represent these types of residence.

Residents – how we use your data

The term ‘resident’ is used to mean any person whose normal place of residence is one of the types of homes listed above (or similar).

All residents are eligible for a test, whether you’re showing symptoms of COVID-19 or not. This test may be conducted in one of the following ways:

- the manager of the home will register on GOV.UK via a unique care home portal for the number of home test kits they need for their residents and staff, then register each person individually (so the test kit number can be linked to your details). The staff of the home will administer the tests and they will be collected by courier from the home and sent for analysis.
- the home will be visited by a testing unit that can test all residents and staff present on the day

The test is voluntary, and you do not have to take it. We strongly encourage you to take a test because of the nature of homes, meaning you’re in close contact with other residents and staff. Some people have tested positive for the virus without showing any symptoms.

For residents unable to give their details because they do not have mental capacity, the manager can provide these details to the mobile testing unit. Only relevant personal details will be provided.

If a testing unit visits your home, they will provide you with instructions and assistance in taking the test, and test kits provided to your home will come with instructions for the staff in how to administer the test.

Once the test has been taken, your sample will be sent off for analysis, and the result will be sent back to you and/or the manager. This is because the manager will need to take action if you test positive, such as moving you to a different part of the home to reduce the risk of spreading the infection to other residents or staff.

If someone has been legally appointed to manage your affairs (such as someone with Power of Attorney status for you), they will also be informed of the result (although this does not apply for Power of Attorneys who have been appointed to manage your financial affairs only).

If you’re a resident in England, your result will also be sent to your GP so they are aware and can plan what care you need.

Staff – how we use your data

You’re also eligible for a test. Taking a test is voluntary, but we strongly encourage you to take a test for the reasons outlined above.

Tests will be conducted in the same way, so if you’re working on the day a testing unit is on site, you can take a test. If they visit on a day when you are not working, the manager can book a home test for you. The kit will be delivered to the home. You can also self-register for a test.

The test will be taken as outlined above. However, when the manager registers you for a test, they will either:

- ask you to input your email address and mobile phone number, so results go directly to you

- input your email address and mobile phone number from your staff record, and ask you to check they are accurate

This is to ensure your test result is sent to you, rather than the manager.

The manager must not input home contact details (as they might for residents) for staff members. You will receive a code to enter into the booking system to verify your contact details.

If you test positive for COVID-19, then you must inform your employer, both for your own personal care and support (as you will need to self-isolate) and for the manager to be able to manage the home provision. You do not need to inform your employer of a negative test.

If you live in England, your result will also be sent to your GP to update your medical records.

Care partners and visitors

A care partner is described as “someone who has a defined practical role to provide additional support to your relative in the care home.” A care partner is normally a close family member or friend who has a long-standing relationship with a resident and plays an essential role on a regular basis on maintaining a resident’s health and wellbeing. Care partners support their relatives with an identified need such as encouraging them to eat and drink. So in essence a care partner is a specific type of visitor to a care home setting who wishes to visit and provide care for a resident.

Visitors are any relative or friend wishing to visit a resident. Visitors need to be tested every time that they visit, even though most will be constant and recurring visitors.

Annex 2: self-testing and reporting

Self-testing may be used in either symptomatic or asymptomatic populations. This allows the test subject to register their details along with the test kit ID number, and report on their result. This testing model will be used for testing within care homes, NHS staff and key workers. The individual taking the test and their role in the test process will be captured (resident, staff or visitor). This is self-asserted, and from a technology and privacy perspective, there is nothing additional to the data collected to existing Registration Lite services. The only data point captured in this service that is not asked for in Registration Lite is the self-asserted result (positive, negative or invalid).

To satisfy Medicines and Healthcare products Regulatory Agency (MHRA) requirements we will require the test site to collect the first name, surname and contact telephone number of the test participants who are collecting the self-test kits from an authorised location. This is so we can have end-user traceability in order to fulfil our regulatory requirement to MHRA in the event of a batch recall, or adverse incidents investigation, or issuing of a field safety notice. We will capture this data only for tracing the individual.

There are slight changes to data flows and the front-end data capture. The service uses the same underlying infrastructure as the existing Registration Lite journey and has the capability to flow down into the various downstream systems used by Registration Lite. However, data will not flow down into GP records or contact tracing. Data will flow down into EDGE so that it can be accessed for PHE reporting purposes and data will also go via BSA to send a confirmatory communication (SMS or email) to the subject with the result they have reported.

Annex 3: cohort pooling

Cohort pooling presents a major opportunity for the UK National Testing Programme as it can significantly increase testing capacity with minimal additional capital investment or disruption to existing lab processes, while simultaneously reducing reagent consumption per test.

Sample pooling is a method which can be applied to testing processes to increase throughput.

Pooling involves aggregating multiple individual samples into a single pool which is tested using the same **R.T.P.C.R.** methodology.

An **R.T.P.C.R.**, also known as a real-time polymerase chain reaction, is a laboratory technique of molecular biology based on the polymerase chain reaction. It monitors the amplification of a targeted DNA molecule during the **P.C.R.**, not at its end, as in conventional **P.C.R.**

A negative result indicates that all samples in the pool are negative. A positive result indicates that one or more samples in the pool are positive. Subsequent testing, informed by policy decisions, can then be used to attribute individual results. Those with a positive test result will be contacted and advised to take an individual test.

While cohort pooling returns a single result for the entire cohort, instead of individual results for each subject within the cohort or pool, there are several use cases that have been identified for which cohort pooling would be a valuable diagnostic tool.

All pooling methodologies, including cohort pooling, offer greater efficiency than individual testing for populations with a low prevalence rate (1 to 5%). For populations with a higher prevalence rate (>5%), the need to retest to identify positive samples within pools reduces the efficiency gained.

Annex 4: lateral flow testing

Lateral flow testing may be used in either symptomatic or asymptomatic populations who are at risk of COVID-19 infection. It is used to ease service demand on labs and to produce results rapidly (within 15 to 20 minutes), for timely reporting and for early detection, isolation and contact tracing of data subjects who might be infected by COVID-19.

Lateral flow immunochromatographic assays, known as lateral flow devices, are intended for the qualitative detection of nucleocapsid antigens from SARS-CoV-2 in human nasal swabs, throat swabs, or saliva samples.

Once you have taken the test, your sample will be analysed at the site and you will be informed of the result (positive, negative or unclear). An app will allow for result communication through existing data flows. You will be advised on any next steps that you should take following your result, including your legal obligation to self-isolate in the event of a positive result.

Negative results do not rule out possible infection and should be considered in the context of a patient's recent exposures, history and the presence of clinical signs and symptoms consistent with COVID-19, and confirmed with a **P.C.R.** test, if necessary, for patient management. The way your data is used and managed is the same as the **P.C.R.** test outlined in the overarching privacy notice.

As part of submitting your test results, we've created a software as a medical device reader, which is able to read your LFT Device results and determine whether it is a positive, negative or void results, and report this result back to our backend systems, where all the activities of NHS T&T services are done.

The intention of this project is not to collect any personal data when individuals are asked to take images of their test barcodes. However, in the very odd instance, that personal data is accidentally submitted by individuals, as part of taking images of test barcodes, there will be further processing of the image, but any additional information included in the image cannot be removed without deletion of the image itself and so will remain in the image.

Annex 5: international arrivals – Test to Release scheme

From 15 December 2020, individuals arriving into England from a country or territory that does not have a valid ‘travel corridor’ and where no travel exemption applies will be offered the opportunity to participate in the Test to Release scheme.

As part of the new UK hotel quarantine policy, international travellers coming into the UK from red or orange government-listed countries will need to isolate in hotels (red country arrival) or homes (orange country arrival). These subjects will be receiving regular testing tests during their stay.

In order to keep track of these test results and allow compliance monitoring, the V2 UK Border – Trace ID updated journeys will ask the data subjects: “Where are you taking your test?” They will have 2 options to select from – ‘hotel’ or ‘home’ – and will then be asked to provide their Trace ID.

Please note the Trace ID is provided to the data subjects in a parallel processing activity conducted by Trace. It is a program code generated by Trace ITS provided to the data subjects when they register for test kits. The purpose of collecting the Trace ID in this V2 is to provide it back to Trace via NPEX for compliance monitoring (such as keeping track of results).

Trace ID processing activity will affect 2 entry points of user journeys: 119 Admin Portal, and the IBT Lite Registration journey.

International arrivals Test to Release – how we use your data

Once you have taken the test, your sample will be analysed in a laboratory and you’ll be informed of the result (positive, negative or unclear) directly by the private test provider.

The private test provider is under a legal obligation to also share your test data with NHS Digital, who send the data that identifies you to Public Health England and to the Test and Trace data platform within DHSC, and a central database held by NHSX and controlled by NHS England.

All information in these databases is held securely and access to this information is tightly governed, in line with data protection requirements.

If you have tested positive for COVID-19 your information will also be sent for contact tracing activities.

Annex 6: genomic sequencing

As part of the COVID-19 testing programme, there is a need to be more targeted in the samples we sequence to ensure we are supporting the identification and management of variants of concern.

The current process in place at DHSC for identifying subjects of interest occurs late in the end-to-end process. This means that samples that should be prioritised for sequencing are discarded before being identified. In addition, many samples of interest are processed in Lighthouse Laboratories that do not have an established process to forward these samples for genomic sequencing.

Currently, Public Health England is sequencing approximately 25% of potential prioritised samples. So, during registration we will ask you to provide us with information so that we can identify whether you are a 'subject of interest'.

Annex 7: daily contact testing

Daily contact testing is an alternative to self-isolation for the contacts of positive cases, involving daily testing. This option will only be offered on some pilots in order to gather evidence for MHRA reporting. Participation in this process is voluntary.

All tests will be carried out at the employer's site or asymptomatic testing site (ATS) (we do not have approval yet to be using self-test for daily contact testing).

The responsibility for gaining permission is devolved to organisations providing the testing service. As part of the Daily Contact Testing process, participants will be required to provide their test results (and confirmatory test results where applicable) to the organisation performing the testing.

When identified as close contacts of another person who is positive for Covid-19, participants can be given the option of undergoing daily contact testing instead of self-isolating.

The organisation must provide guidance to employees participating in daily contact testing, to continue to follow standard national infection prevention and control guidance (e.g. social distancing, handwashing, and appropriate PPE).

When a positive case has been found, close contacts will be required to test each morning for 7 days, the organisation is responsible for ensuring compliance. Individuals who continue to test negative will be able to operate as per the COVID-19 guidelines from their local authority.

If a participant is unable to test on any of the 7 days (for example if the ATS is closed on the weekend or the test Participant has time off work), they will be required to self-isolate until they are able to take another test.

Annex 8: list of data processors

Each organisation that processes your information must provide you with information about how they do this, and this information will be limited to their role in the test programme. This should be publicly available on their website or can be requested from them. For example, if you want to know more about how NHS Digital uses your information, then you can visit their website.

Data processors can only act upon written instruction from a data controller, they cannot use data and information without permission of the data controller.

Name	Services they provide
ACF Technologies	Providing software to enable you to book a test at a regional test site
Amazon	Provide logistics for home delivery of test kits, collecting completed test kits from homes and delivering them to labs

Name	Services they provide
Amazon Web Services (AWS)	Provide digital solution for ordering home test kits
AstraZeneca (Laboratory)	Analyse sample from the completed test kits and share results with NPEX
Barcode Warehouse	Providing bar codes for test kits
Boots	Provide testers and test supervisors on regional test sites
Charitable organisations	Where used by local authorities to deliver specific support requirements to enable you to self-isolate
Courier 1 (DHL)	Distribution, storage, packing and transport of test kits
Courier 2 (Royal Mail Group)	Collecting completed test kits from homes and delivering them to labs
Courier 3 (Kuenhe + Nagel)	Distribution, storage, packing and transport of test kits
Deloitte	Sends test invitation text messages to referred employees, hosts and maintains the digital platform that the test tracking system sits on, manages the registration and appointment booking, provides the capability for users to enter sample bar codes, responsible for holding data captured by the registration system and making it available to the NHS
EMIS Health	Provide Keystone product to enable NPEX to link your test result to your GP record
Experience Lab	Provide user or market research for people who have undertaken tests
G4S	Provide facilities management for some regional test sites
Jigsaw24	Provide mobile phones and SIMs for the mobile test units apps
Laboratory 1 (Milton Keynes)	Analyse sample from the completed test kit and share results with NPEX
Laboratory 2 (Alderley Edge)	Analyse sample from the completed test kit and share results with NPEX
Laboratory 3 (Glasgow)	Analyse sample from the completed test kit and share results with NPEX

Name	Services they provide
Laboratory 4 (Cambridge – run by AstraZeneca)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 5 (HSL & UCL)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 6 (Imperial College London)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 7 (Charnwood Lighthouse Laboratory)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 8 (Newport)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 9 (Integrated COVID Hub North East)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 10 (BSPS)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 11 (Queen Mary's University, London)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Laboratory 12 (Plymouth Lighthouse Laboratory – UHP)	Analyse sample from the completed test kit and share results with <u>NPEX</u>
Levy	Provide facilities management for some regional test sites
Ministry of Defence/Armed Forces	Providing mobile test units, providing testing staff at some regional test sites

Name	Services they provide
National Pathology Exchange (NPEX) – hosted by Calderdale and Huddersfield NHS Trust	Receives results from labs and links results to test registration, flows results data to NHS Business Services Authority, flows results data to NHS Digital, flows results to your GP via the Keystone product
NHS Business Services Authority	Reports non-Randox results back to the individual who has taken the test, collates results and send country-specific data to the 4 home countries
NHS Digital	Manages the ‘Ask for a coronavirus test’ section of the NHS.UK website (for members of the public booking tests)
NHS England	Receives results data from NPEX (via Arden and Greater East Midlands Commissioning Support Unit, part of NHS England, who strip out any identifiable data from it), to include in the NHS Data Store (called Foundry)
Office of National Statistics (ONS)	Research and analytics for monitoring of COVID-19
Palantir	Analysis of anonymised data
Public Health England	Analysis of results data for monitoring of COVID-19
Public Health Scotland	Analysis of results data for monitoring of COVID-19
Public Health Wales	Analysis of results data for monitoring of COVID-19
Public Health Agency (Northern Ireland)	Analysis of results data for monitoring of COVID-19
Randox	Supplies home test kits, analyses the samples, informs you of the result of your Randox home test
Serco	Provides facilities management for some regional test sites
Royal Mail	Provide logistics for home delivery of test kits, collecting completed test kits from homes and delivering them to labs
ServerLabs	Building the digital solution

Name	Services they provide
Sodexo	Provides testers on regional test sites, provides facilities management for some regional test sites
Splunk Inc	Providing software to monitor your test data across the Test and Trace systems
Teleperformance	Providing call centre assistance
TransUnion	Provides identity verification checks as part of the registration process for a home test kit (this is not a credit check and will not affect your credit score)

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