

21 April 2021

Daily Contact Testing (DCT) Schools Clinical Trial – Data Sharing FAQ's

Dear School / College Leader,

FAQs Concerning Schools and Colleges data sharing arrangements as part of the Schools and Colleges Daily Contact Testing (DCT) Trial

Question 1 - Can we share the data in the DCT register without getting consent from everyone to whom it refers?

Answer: “The DCT register includes information on all staff and students in the school or college as well as information on individuals that test positive and their close contacts - even if they chose not to participate in the DCT trial. In both instances, sharing of this information does not require consent but uses lawful bases detailed in the Privacy Notice. Specifically, this data is processed under article 6 (1) (e) of the UK General Data Protection Regulations (GDPR), which relates to tasks carried out in the public interest “

Question 2 - When the Department of Health and Social Care (DHSC) shares school or college data with the Office of National Statistics (ONS), isn't this in breach of Data Privacy Legislation?

Answer: “No, this is not a breach of data privacy law. DHSC are working with ONS because of ONS's expertise in studies of this nature. In this relationship ONS are a 'processor' for DHSC and the use of personal data by ONS is governed by a 'data processing agreement'. This agreement ensures each party's obligations are clear, including that data is obtained and processed in accordance with data protection laws.”

Question 3 - Does the use of the research PCR data for genomic sequencing mean you will be storing or sharing individual's DNA data?

Answer: “Genomic sequencing will be performed on viral RNA data. No human genomic sequence information will be analysed, stored or reported. All viral genomic sequencing results are stored on a secure platform without any individual identifiable information linked to the sequence data.”

Question 4 - Will my data be shared with ONS and IQVIA?

Answer: “Any information that identifies people is only shared with parties acting under the instruction of DHSC and for the purposes of this trial. For this trial, identifiable data is processed by ONS and their partner organisation IQVIA who assist with collection of personal data. Each party is subject to obligations to process personal data in compliance with data protection laws and to keep data secure.”

Question 5 - How secure is the data we are sharing with you?

Answer: “The data is treated securely at all stages. Data is provided to us via a secure platform that is security assessed and transferred by secure file transfers. Access to all DHSC, IQVIA and ONS processes are restricted to a small number of staff with security clearance, for the processing of data for clinical purposes.”

Yours sincerely,

Daily Contact Testing (DCT) Schools Clinical Trial Team
NHS Test & Trace