

Privacy Notice in Relation to Covid 19

The health, safety and wellbeing of pupils, staff and visitors to the academy is of utmost importance and considerable planning has gone into ensuring robust systems and effective management procedures are in place to mitigate against the spread of virus transmission and also how to deal with cases should there be any potential or actual outbreaks of coronavirus.

It is vital that we all work together to protect pupils/students, staff, parents and everyone who comes into our premises. We will therefore co-operate with agencies such as Public Health England and Local Authorities and follow the Track and Trace process as required by Government. We are also mindful of protecting the personal data of individuals.

Collecting Personal Data with Regard to Covid 19

We have a lawful basis to collect and share personal data with relevant authorities where necessary relating to employees, pupils, parents and visitors to the academy under the GDPR and Data Protection Act 2018 and in our privacy notices we make it clear that this includes safeguarding the health and wellbeing of pupils and staff.

The lawful basis for the processing of personal data by Public Health England (PHE) for the purpose of protecting public health is provided by the following two Articles of the GDPR:

- Article 6 (1) (e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller', which covers personal information (names, date of birth etc); and
- Article 9 (2) (i) 'processing is necessary for reasons of public interest in the area of public health', which covers special category data such as health data.

Sharing Data under the "Track and Trace" Scheme

We may be required to share Personal Data of individuals under the Track and Trace scheme.

In sharing this information, we will take into account the risks of not sharing the information.

Where data needs to be shared with Health officials we will:

- limit the data shared to the minimum necessary
- only share data with the appropriate authorities
- share via secure methods (e.g. encrypted email)
- verify the identity of persons making phone calls/sending emails requesting personal data (be aware of the risk of cyber/impersonation crime)
- keep a record of all disclosures made, including when and the rationale for doing so. And notify any individuals whose data has been shared (if practicable).

The Privacy Notice for the scheme can be found at:

<https://contact-tracing.phe.gov.uk/help/privacy-notice>

Visitors' Information

For Track and Trace purposes we may wish to obtain visitors' telephone numbers. If this is done it will be on a voluntary basis as there is no legal requirement for visitors to provide us with their contact details.

If contact details of visitors are obtained, they will be kept secure and not on public display within the visitors' book. Any contact tracing details from visitors will be kept for 21 days only, after which the data will be securely destroyed.

ICO guidance on this may be found at:

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/coronavirus-recovery-dataprotection-advice-for-organisations/collecting-customer-and-visitor-details-for-contact-tracing/>

Sharing Information with the School Community

If anyone in our academy tests positive for coronavirus we have safety measures in place. It may be necessary for groups of people to be sent home with requests that they go for testing. If there are multiple cases, this will be reported to Public Health England.

It is unlikely that it will be necessary to share personal data relating to health with any other person or with the academy community; a general statement may be made such as "a parent of a child in your child's school 'bubble' has experienced COVID-19 symptoms..." or "a member of staff teaching another 'bubble' in school has developed COVID-19 symptoms...". Names of individuals affected, or more detailed health details will not be shared.

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Headteacher of the academy or the SNMAT Data Protection Officer at data.protection@snmat.org.uk.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

Contact:

If you would like to discuss anything in this privacy notice, please contact:

Lisa McVeigh
Samworth Church Academy
Sherwood Hall Road
Mansfield
Notts
NG18 2DY

Or

Data Protection Officer
data.protection@snmat.org.uk

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>