



PRIVACY NOTICE

Coronavirus Track and Trace

All schools have an obligation to respond to the Government's advice on the Coronavirus. The development of the NHS 'Track and Trace' scheme is a key part of the Government's plan to manage Coronavirus.

The wellbeing and the health and safety of our children, staff and their families is at the heart of our planning in order to ensure that our school is as safe a place as possible.

Our responsibility extends beyond the school gates and we have a duty to respond to the Government's guidance. We hold a lot of data and it may be necessary for us to share this data, when requested to do so, with the Public Health NHS (National Health Service) Track and Trace Workers.

We expect that we will be asked to provide details, including contact details, of any cases of Coronavirus (or a suspected case) that may arise within Frank Wise School. We have an obligation to share this, and any other health data, as part of our Public Duty (set out below).

We will endeavour to contact any and all individuals directly so that we can manage the information and sharing of their data. However, in some cases we may be required to provide this to the new Public Health NHS Track and Trace system. We will keep a record of any information that has been shared.

We will limit the data shared to the minimum necessary, and share via secure methods (e.g. encrypted email).

This Privacy Notice should be read alongside our school's Data Protection (GDPR) Policy, and other Privacy Notices.

NHS Test and Trace – the Law

The law on protecting personally identifiable information (GDPR) allows Public Health England to use personal information collected by NHS Test and Trace. The section of the GDPR that applies is:

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"*.

As information about health is a special category of personal information, a further section of the GDPR applies:

Article 9(2)(i): *"processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare"*.

Public Health England also has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without people's consent where this is in the public interest. The part of the law that applies here is Section 251 of the National Health Service Act 2006 and the associated Health Service (Control of Patient Information) Regulations 2002. This includes the use of the information collected by NHS Test and Trace to help protect the public from Coronavirus.

The Right of Access to Personal Data

Staff, families and pupils have the right to request access to their personal data that we hold. Full details of how to make a request, along with how to object, rectify, restrict the processing of or transfer personal data is given in our Data Protection Policy (GDPR) available on the school website.

To make a request to access personal data or to exercise any of the above rights, an individual should first contact the school's Data Controller: Matt McArthur - matt.mcarthur@frankwise.oxon.sch.uk.

The law does not oblige the school to comply with all requests. If the school does not intend to comply with the request, then the individual will be notified in writing of the reasons why.

Concerns

If you are concerned about how we use personal data, then we ask that you contact your school's Data Controller: Matt McArthur - matt.mcarthur@frankwise.oxon.sch.uk

To contact the school's Data Protection Officer: office@turniton.co.uk

An individual may also contact the Information Commissioner's Office: <https://ico.org.uk/concerns>.

Reviewed by: Matt McArthur

Date: August 2020

Approved by Governors:

Date: August 2020