

## **Addendum Covid Privacy Notice**

### **Why we are collecting personal data**

Covid 19 is a highly infectious disease which continues to present an on-going risk to public health. Covid 19 is a coronavirus. The development of the NHS test and trace programme and coronavirus testing in schools is an important part of the government plan to manage the coronavirus pandemic. As a private individual, participation in the test and trace scheme is optional and individuals cannot be forced to provide their details when entering school premises. However, schools have a legal duty to protect and promote the welfare of pupils and a duty of care to school staff. Schools are required to manage confirmed cases of coronavirus among the school community to contain any outbreak by engaging with the NHS Test and Trace process and following local health and protection advice. This may involve gathering and sharing information to assist with the NHS Track and Trace strategy with Public Health England and the local authority. Department for Education guidance issued in February 2021 advises that records should be kept of all visitors with sufficient detail to support rapid contact tracing if required by NHS Test and Trace. Data collected for covid related purposes will not be used for any other purpose.

### **What data we will collect**

We will collect only the minimum information necessary to enable us to support the government test and trace strategy. For individuals visiting school premises we will ask them to provide: full name, contact telephone number, or email address if telephone number is not available/ home address if a telephone number or email address is not available together with details of date, time and duration of visit, the areas accessed/ who they visited.

### **Our lawful basis for collecting and sharing your data**

We are sharing information in accordance with the provisions of UK General Data Protection Regulation Article 6 (1)(e) and Section 8 of Data Protection Act 2018 which provides for processing of personal data that is necessary for the performance of a task carried out in the public interest.

Health data is processed in accordance with the provisions of UK GDPR Article 9(2)(i) as it is necessary for reasons of public interest in the area of public health to reduce the transmission of the coronavirus. The relevant conditions for processing in the Data Protection Act 2018 are contained in Schedule 1, paragraph 2 (health or social care purposes)/ paragraph 3 public health purposes.

The privacy notice for the contact tracing service can be found here:

[Privacy Information \(phe.gov.uk\)](https://www.phe.gov.uk/privacy-information)

## **How long we will retain the data**

Personal data collected for track and trace will be retained by us for at least 3 weeks (21 days). All personal data will be held and disposed of in a safe and secure manner when it is no longer needed.

## **How we keep your data secure**

**[Insert details of steps your setting takes to keep this information secure]**

Data will be kept securely at school with all paper copies destroyed onsite using appropriate procedures in line with existing GDPR policies.

## **Your rights**

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

[Lawful basis for processing | ICO](#)

