

PRIVACY NOTICE

LIPSON VALE PRIMARY SCHOOL NHS Test and Trace

INTRODUCTION

Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679).

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. The easing of social and economic lockdown measures following the COVID-19 outbreak is being supported by NHS Test and Trace. We are being asked to assist this service by keeping a temporary record of visitors and assist NHS Test and Trace with requests for that data if needed.

This data is collected directly from you and this document provides information on the data collected and how it is used.

THE CATEGORIES OF INFORMATION THAT WE PROCESS INCLUDE:

- Personal identifiers for you (such as name, contact telephone number);
- The dates and times that you are at work (if you are a staff member)
- The date, arrival and departure time if you are a visitor to our school and the reason for your visit, e.g. meetings, to deliver activities etc. and who you are visiting.
- The assigned member of staff will be recorded with the visitor's name, if the visit will be limited to that one staff member.

PROCESSING PERSONAL INFORMATION

The Data Protection Act 2018 and the EU General Data Protection Regulation ensure that we comply with a series of data protection principles when processing personal data. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner;
- Collect personal information for a specified, explicit and legitimate purpose;
- Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected;
- Ensure the personal information is accurate and up to date;
- Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected;
- Keep your personal information securely using appropriate technical or organisational measures;

GDPR also requires that we have a lawful basis to collect and use your information. We are processing this personal information as it is necessary for the performance of a public health task carried out in the public interest in accordance with Article 6 (1) (e) of the General Data Protection Regulation.

WHY WE COLLECT AND USE PERSONAL INFORMATION

NHS Test and Trace is a key part of the country's ongoing COVID-19 response. If people who have recently come into close contact with a new COVID-19 case can be rapidly detected, swift action to minimise transmission of the virus can be taken. Containing outbreaks early is crucial to reduce the spread of COVID-19, protect the NHS and social care sector, and save lives. This will help to avoid the reintroduction of lockdown measures and support the country to return to, and maintain, a more normal way of life. The personal data we collect is essential for us to support the NHS Test and Trace programme.

INFORMATION SHARING AND CONSENT

We will only collect information that is necessary for the reason we have requested it and we will not use it for any other purpose.

NHS Test and Trace is voluntary and although we encourage you to provide your information for this purpose you can choose to opt out if you wish. If you do not want to provide your information for NHS Test and Trace please let us know when asked. You will still be required to complete the standard visitor signing in register which does not collect contact information.

The information that you provide for this purpose will be shared with NHS Test and Trace, if necessary and when requested. NHS Test and Trace will use this information to alert you that you have been in close contact with someone who has tested positive for coronavirus. That contact will usually be by text, email or phone call.

If you are a staff member and do not want us to share the contact information we hold for you with NHS Test and Trace please inform the Business Manager or Head Teacher.

RETENTION PERIODS

To support NHS Test and Trace we will retain this information for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days this information will be securely destroyed or deleted.

The usual visitor signing in register will still be retained in line with the school's data retention policy. There are no changes to the way we process (including retention) staff contact information.

INDIVIDUAL RIGHTS REGARDING PERSONAL DATA

Under data protection legislation, you have rights in relation to information about you that we hold.

You have:

- The right to be informed via Privacy Notices such as this;
- The right to ask us for access to information about you that we hold;
- The right to have your personal data rectified, if it is inaccurate or incomplete;
- The right to request the deletion or removal of personal data;

To make a request under any of your rights please contact the Data Protection Officer.

If you have a concern or complaint 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/>

DATA CONTROLLER

Lipson Vale Primary School is registered as a data controller with the Information Commissioner's Office (registration number: Z7308139).

CONTACT

If you would like to discuss anything in this privacy notice, please contact: our Data Protection Officer, Liz Easterbrook in writing at Finance, Plymouth City Council, Ballard House, West Hoe Road, Plymouth, PL1 3BJ, by telephone on 01752 398380 or by email at dataprotectionofficer@plymouth.gov.uk