

The Four Stones Multi Academy Trust

Privacy notice-Coronavirus (COVID-19)

Version Control

Policy author: Ruth Allen
Policy approved by: Finance, Audit and Risk Committee
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Version	Date	Details
1.0	25 th Nov 2020	Privacy notice written to reflect the sharing of data during the COVID-19 pandemic
2.0	1 st Sept 2021	Update of DPO and DPR contact information

This Privacy Notice has been written to inform students, parents/carers and staff of The Four Stones Multi Academy Trust about how we are using your information in light of the measures that have been introduced in response to the Coronavirus (COVID-19) pandemic. This privacy notice should be read in conjunction with our standard privacy notices.

Under data protection law, individuals have a right to be informed about how our schools use any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use your personal data. We, The Four Stones Multi Academy Trust (MAT), are the 'data controller' for the purposes of data protection law. Our data protection officer (DPO) is Jess Hathaway (see 'Contact us' below).

What information are we collecting?

The categories of information that we collect, hold and share include the following:

- Basic personal information (e.g. name, student number, DOB and address) (students, parents/carers and staff)
- Safeguarding information (students)
- Job role and evidence of employment in this role (parents/carers)
- Attendance information (students and staff)

We will also process information which may include 'special category' data about our students including:

- Information which identifies children that are 'vulnerable' (those who have a social worker, such as children in the care of the Local Authority and those children and young people up to the age of 25 with education, health and care (EHC) plans)
- Relevant medical information (students and staff)

Why do we process your personal data?

We are processing this information to facilitate the provision of care for vulnerable children and the children of critical workers. This involves:

- Processing student information to facilitate their learning and meet any care requirements that they have.
- Processing parents'/carers' employment information to confirm their status as a critical worker.
- Processing the information of staff members who have been redeployed in order to meet resourcing needs.

Any personal data that we process about our students and parents/carers is done so in accordance with Article 6 and Article 9 of GDPR:

- Article 6 (c) legal obligation Article 6 (d) public task Article 6(b) contract (for staff)
- Article 9 (b) Employment, social security and social protection (for staff) Article 9 (g) Reasons of substantial public interest

Please refer to our standard privacy notices for further information about the lawful basis we rely upon to process your data.

Who do we obtain your information from?

Much of the information we process will be obtained directly from you. We will also process information received from:

- Department for Education (DfE)
- Local Authority (LA): If your child is attending one of our schools as a result of the COVID-19 pandemic response and your child's previous school was in a neighbouring LA, then we may need to obtain information from this LA.
- Previous schools attended

Who do we share your personal data with?

We are obliged to share attendance data with the Department for Education during this time. The following information will be shared:

- The names of all students who are in attendance on each day.
- If the student has parents/carers who are critical workers.
- If the student is vulnerable e.g. they have on an education health and care plan (EHCP), have a social worker (CiN), or are looked after children.
- If the student has an EHCP.
- If the student has a social worker.
- The time the student signed into the school.
- The time the student signed out of the school.
- The number of students or staff members that are ill, isolating, shielding and whether there is a suspected or confirmed case of COVID-19.
- The number of students or staff members who have been asked to self-isolate by the NHS Test and Trace system.
- The number of students or staff members living with a clinically extremely vulnerable person.

We may also be required to share information with neighbouring Local Education Authorities if your child is attending another school as a result of the COVID-19 pandemic response and your child's previous school was in a neighbouring LA.

For further details about who we share information with, please see our standard privacy notices.

How long do we keep your personal data for?

We will only retain your data for as long as it is necessary to do so. In respect of parents/carers, we will not retain a copy of the evidence that you provide to us to prove that you are a critical worker.

For further details about retention of your data, please see our standard privacy notices.

What rights do you have over your data?

Under GDPR data subjects have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation.
- to request access to your personal data that we hold, and be provided with a copy of it.
- to request that your personal data is amended if inaccurate or incomplete.
- to request that your personal data is erased where there is no compelling reason for its continued processing.
- to request that the processing of your personal data is restricted.
- to object to your personal data being processed.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO (see 'Contact us' below).

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer. Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>

- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

NHS Test and Trace

All UK schools have an obligation to respond appropriately to the Government's advice regarding coronavirus. In order to aid the Government in fighting COVID-19 (coronavirus) and to help keep everyone safe as children return to school, the school will take part in the NHS "Test and Trace" service.

If there is a suspected or confirmed case of COVID-19 then we may be required to share the personal data of staff, students, parents/carers and visitors with NHS Test and Trace, who act as a Data Controller in their own right. We may also share this information with the Local Authority, who will use it for the purposes of COVID-19 prevention and detection only. This information may include:

- Your full name
- Your date of birth
- Your contact details
- Relevant medical information

We will keep a record of any information shared.

If the NHS Test and Trace service contacts you, the service will use text messages, email or phone. All information which we share through this service is shared in accordance with Article 6 and 9 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'*
- *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'*

For more information about the service please see the Government guidance and Public Health England's privacy notice:

- <https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>
- <https://contact-tracing.phe.gov.uk/help/privacy-notice>

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

- Jess Hathaway is the data protection officer for the MAT and can be contacted via email at dpo@thefourstonesmat.co.uk.
- Jenni Dunn is the data protection representative for King Charles I School and can be contacted via the school office or email at jdunn@kingcharles1.worcs.sch.uk.
- David McQuillan is the data protection representative for Haybridge High School and can be contacted via the school office or email at dmcquillan@haybridge.worcs.sch.uk.
- Matt Sandell is the data protection representative for The De Montfort School and can be contacted via the school office or email at msandell@tdms.worcs.sch.uk.