



Pupil Privacy Notice Addendum on COVID-19

This notice describes how we may use pupils' personal information to protect them and others during the Covid-19 outbreak. It supplements our main Pupil Privacy Notice, which is available

<http://sirthomasfremantle.ng1.devwebsite.co.uk/attachments/download.asp?file=441&type=pdf>

Pupils' rights in relation to the processing set out in this addendum can be found in our main Privacy Notice. They include the right of access and rectification. If a pupil or parent has any concerns about our processing of personal data in relation to the COVID-19 pandemic, they should contact our Business Manager, Emma Windsor.

Safeguarding the health and safety of our pupils, members of staff and school community is of paramount importance. During the COVID-19 pandemic we may process personal data in additional ways to ensure we are doing everything we can to protect everyone's health.

This may include:

- Asking whether pupils (or anyone in their households) are experiencing any COVID-19 symptoms
- Collecting specific health data when someone tells us they are experiencing COVID-19 symptoms
- Keeping a record of COVID-19 related health information
- Analysing personal information already shared with us so we can ensure we are taking all possible measures to keep everyone safe
- Sharing information with others, for example, with other members of a school 'bubble'/community, Public Health, NHS Track and Trace or NHS Lateral Flow Testing System.

When we process pupil personal information in this way, we will always abide by data protection law; namely, the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (UK DPA 2018).

Our processing will meet the **principles laid down in the GDPR**. This means that we will:

- Only collect and use the minimum amount of information that is necessary for our purpose of protecting the health and safety of pupils, and that of others
- Make sure that any decisions we make about pupils based on this information are fair and don't discriminate against them
- Only retain this information for as long as necessary. The retention period will be 12 months, but we will keep this under review. Lateral Flow Testing data will be retained for 1 month after which it will be destroyed in line with NHS guidelines.
- Ensure the security of pupils' personal information by adhering to the procedures laid down in our Data Protection Policy and IT/e-safety policies/user agreements
- Share the minimum amount of personal information necessary for our purpose. We will do this verbally if appropriate, and will always seek not to share an individual's name unless it is absolutely necessary
- Be open and transparent about our processing - through this addendum to our privacy notice and in any communications with pupils/parents.

Under the GDPR we must have a **lawful basis** to process personal data as described above:

Our lawful basis is the one of 'public task', being processing that is necessary for our function as a school/ tasks in the public interest.

Due to its sensitivity, health information has extra protection under the GDPR and the UK Data Protection Act 2018 as special category data. This means we have to identify an additional lawful condition for our processing:

Our lawful condition is 'reasons of substantial public interest' under the GDPR and 'safeguarding of children and of individuals at risk' under Schedule 1, Part 2 of the UK DPA 2018.