

BRYANSTON

COVID-19 Data Protection Statement

During these unprecedented times, Bryanston School's main priority is safeguarding the health and safety of our pupils, parents and staff, including the wider school community, as well as supporting the School in responding to the COVID-19 pandemic.

As a result of these unique circumstances, Bryanston School has written this COVID-19 Data Protection Statement to inform pupil, parents, staff and the school community about how we may use your information in light of the measures that have been introduced in response to the Coronavirus (COVID-19) pandemic. Processing your personal data in additional ways ensures we are doing everything we can to protect everyone's health.

This statement has been prepared with due diligence in line with data protection legislation and in response to frequent amendments to Government health guidance and also advice from the Information Commissioners Office.

We are committed to protecting your personal data and being transparent about what data we process about you. This COVID-19 Data Protection Statement applies to all pupils, parents and staff including the wider school community and it explains how we collect, use, process and share your personal data in relation to COVID-19 and your rights regarding your personal data.

This COVID-19 Data Protection Statement should be read alongside the other Privacy Notices on our website.

What information are we collecting?

The School will already collect, hold and share some of your personal data which includes basic personal information (e.g. name, pupil number, dob and address) (pupils, parents and staff).

(For a full list of the personal data we process about you, please refer to the appropriate Privacy Notice on the School's website).

Information we may collect:

- Asking whether pupils/staff etc. (or anyone in their household) are experiencing any COVID-19 symptoms;
- Collecting specific health data when someone tells us they are experiencing COVID-19 symptoms or have tested positive to COVID-19.
- Taking pupils and staff temperature readings at an appropriate frequency after careful consideration and where justified in the circumstances;
- Keeping a record of COVID-19 related information;
- Reviewing personal information to ensure we are implementing all necessary safety measures;

Where we undertake testing for COVID-19 within School, we will not collect any further personal data from you during the process, however, should a test return a positive result, we will process this information in compliance with data protection legislation and with the pupil and/or staff escalation plan.

Why are we processing this personal data?

Under health and safety legislation, the School has a duty to ensure that all reasonable steps are taken to protect and promote the health and safety of its pupils, staff and any visitors to the site. In response to the pandemic, testing for COVID-19 will be undertaken by school medical centre staff on behalf of the Quarterjack Surgery in relation to pupils. Testing kits may also be made available to some staff if the need arises. Should a pupil or member of staff test positive, the School will be immediately alerted to the risk of transmission and will take action to mitigate that risk. Therefore, testing is key to facilitating the pupil or staff escalation plan, in the event of a positive test for COVID-19.

Using your personal data and the legal basis for processing during the COVID-19 pandemic.

Bryanston School must have a lawful basis to process personal data as described above. The lawful basis we will rely upon is 'legitimate interests' as detailed below:

- Legitimate Interests: Article 6(1)(f) This basis recognises that the processing of personal data is likely to be in the interests of the individual, the School and the public health efforts to tackle COVID-19, as long as individuals' rights are protected, and data protection principles are followed.

In addition to identifying a lawful basis for processing personal data during the pandemic, as health data is regarded as 'special category data' then a further condition must be satisfied. The further conditions the School will rely upon are:

- Employment related obligations Article 9(2)(b) together with Schedule 1 condition 1 of the Data Protection Act 2018 (as amended or superseded) in ensuring compliance with health and safety obligations under employment law (for the safety and welfare of the School's employees).
- Public health Article 9(2)(i) together with Schedule 1 Condition 3 of the Data Protection Act 2018.

Sharing personal information

In normal circumstances, the sharing of a health-related information is governed by strict rules of confidentiality. However, during this pandemic, your personal data may be shared in the following ways:

- Currently, the School is required to inform Public Health England following a positive on-site test for COVID-19. This will involve providing the individuals name and contact details.
- The School will inform the individuals parent(s)/guardian in the case of a pupil testing positive.
- The School may also share the name of the individual who has tested positive with those members of the School community who are deemed to require this information in order to establish if they or others have had close contact with that person. This information will enable those whom have been in close contact, to take appropriate protective steps. Such information is shared on a confidential basis. Where appropriate other such data sharing may be limited to for example department or Boarding House.
- In accordance with the staff escalation plan and whether staff members should be isolating at home, certain information will be shared with managers as to whether the relevant individual, or anyone within their household is displaying symptoms of COVID-19 or whether an individual is at increased risk of severe illness from COVID-19.
- It is likely that we will be asked to provide contact details if a case or suspected case of Coronavirus arises in school. There is an obligation to support government planning and we will provide details as requested in order to do this for example with NHS Track and Trace.

Data security

We assure you that all necessary steps will continue to be taken to maintain the security of your personal information by adhering to the procedures laid down in our Data Protection Policy, ICT Policy and other associated policies and procedures.

What rights do you have over your data?

There are a number of rights you have under The General Data Protection Regulation (GDPR) and the Data Protection Act 2018. (as superseded or amended) Your rights are detailed fully in the School's Privacy Notices published on the Schools website and on the Staff Hub. A precis of your rights includes:

- To obtain access to, and copies of, the personal data that we hold about you;
- To require us to correct the personal data we hold about you if it is incorrect;
- To require us (in certain circumstances) to erase your personal data;
- To request that we restrict our data processing activities (and where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purposes of you transmitting that personal data to another data controller;
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

How long will we keep this information for?

The personal data which we already held will be kept in line with the School's Records Management Policy, however, we will be collecting and sharing new information directly as a result of the current situation. There will be a limited period of time for which the information we collect specifically for the purpose to Covid-19. As we do not yet know how long the situation or response will last, then the requirement to keep the information will be kept under review, however it is likely to be at least a year after the situation is less critical.

Changes to this Privacy Statement

We will regularly review this COVID-19 Data Protection Statement and its applicability throughout the COVID-19 pandemic. We reserve the right to update this document at any time and will provide you with a new COVID-19 Data Protection Statement if and when we make any substantial updates.

Contact and Complaints

If you have any queries or complaints about this COVID-19 Data Protection Statement or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Data Protection Officer, by post: Bryanston School, Blandford Dorset DT11 0PX, by email: dpo@bryanston.co.uk or by phone: + 44 (0)1258 452411.

Whilst you have the right to raise a complaint with the Information Commissioners Office (ICO), the School would ask that in the first instance contact is made with the Data Protection Officer.

Reviewed: January 2021
Reviewer: Senior Leadership Team
Next Review: January 2022
Author: Data Protection Officer

