

INVICTUS

Education Trust

Coronavirus (COVID-19) Pupils, Parents and Staff Privacy Notice – January 2022

This Privacy Notice has been written to inform pupils, parents and staff of Invictus Education Trust about how we are using your information in light of the latest measures that are in place in response to the Coronavirus (COVID-19) pandemic. This notice may be subject to change and is an update to the original notice issued at the start of the pandemic in 2020.

This Privacy Notice should be read in conjunction with our standard Pupils and Parents, and Employees Privacy Notices.

Who are we?

Invictus Education Trust is a ‘Data Controller’ as defined by Article 4 (7) of the UK GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Veritau Ltd to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with the UK GDPR and to oversee data protection procedures. If you would like to discuss anything in this privacy notice, please contact the Trust’s Senior Information Risk Owner Emma Myers by email emyers@invictus.education or Veritau Ltd. Veritau’s contact details are:

Schools Data Protection Officer
Veritau Ltd
County Hall
Racecourse Lane
Northallerton
DL7 8AL
schoolsDPO@veritau.co.uk
01904 554025



Please ensure you include the name of your Trust in all correspondence

What information are we collecting?

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

- Basic personal information, e.g. name, pupil number, DOB, and contact details
- Attendance information regarding pupils and staff

We will also process information which may include ‘special category’ data about our pupils including:

- Relevant medical information about pupils and staff, e.g. results of any testing and the reporting of positive cases

Why do we process your personal data?

We are processing this information to facilitate the provision of education during the pandemic. This involves:

- Processing pupil related information to facilitate their learning and meet any care requirements that they have.
- Processing the information of staff members to enable resource management.

Any personal data that we process about our pupils, parents or staff for these purposes is done so in accordance with Article 6 and Article 9 of the UK GDPR:

Article 6 (d) public task as supported by the Education Act 2002 for maintained schools (Section 175) or Non-Maintained Schools Regulations 1999 for non-maintained schools (Section 3).

Article 9.2(i) of the UK GDPR, where it is in the public interest on public health grounds. This data is processed under the obligations set out in public health legislation including Regulations 3(1) and (4) of the Health Service (Control of Patient Information) Regulations 2002 (COPI) which allows the sharing of data for COVID-19 related purposes where carried out by a health care professional or someone operating under an equivalent duty of confidentiality.

Please refer to our standard Pupils and Parents and Employees Privacy Notices for further information about the lawful bases we rely upon to process your data.

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, keep everyone safe and maintain attendance within the school setting, the Trust 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 staff, students, parents and visitor's personal data with NHS Test and Trace, who act as a Data Controller in their own right.

The information will be transferred to DHSC, who will share this with the NHS and GPs. PHE and the Local Government will use this information for wider COVID-19 testing and tracing activities, as well as statistical and research purposes.

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.

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

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>

<https://contact-tracing.phe.gov.uk/help/privacy-notice>

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 Education Authority
- Local Public Health services

Who do we share your personal data with?

In addition to the Test and Trace requirements to share data, we are obliged to share attendance data with the Department for Education during this time. Some or all of the following information may be shared:

- The names of all children who are in attendance on each day
- The number of children or staff members that are ill, isolating, shielding and whether there is a suspected or confirmed case of COVID-19
- The number of children or staff members who have been asked to self-isolate by the NHS Test and Trace system

For further details about who we share information with, please see our full Pupil and Parents and Employees 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; or where a retention has been specified within the legislation.

For further details about retention of your data, please refer to our full Pupils and Parents and Employees Privacy Notices.

What rights do you have over your data?

Under the UK 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 on the address provided above.

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow Cheshire
SK9 5AF
icocasework@ico.org.uk / 0303 123 1113

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 27 June 2022.