

Bright Futures Educational Trust
Privacy Notice Covid-19

Introduction

Bright Futures Educational Trust may, should the need arise, be required to collaborate with the NHS Test and Trace Programme, Public Health England (and any successor) and/or relevant Local Authorities in light of the current Covid-19 pandemic and share information about pupils, parents and staff. This privacy notice shall set out the information we may need to share, our lawful basis for sharing and other transparency information as required to understand the nature of our processing activity in this regard.

Information sharing

Bright Futures Educational Trust, NHS Track and Trace, Public Health England and Local Authorities are controllers of data under data protection law. As part of the National response to Covid-19, Bright Futures Educational Trust may need to share staff/pupil/parental information with third party controllers in response to a potential outbreak of Covid-19 or to assist the third party organisations named above to perform their statutory public health duties in identifying those who may have been exposed. The reasons for sharing the information are as follows:

1. If the NHS Test and Trace team believes that a member of staff or a pupil may have come into contact with a person who has recently tested positive and/or has symptoms of coronavirus;
2. In the event of the above, this information enables the NHS Test and Trace team to contact the member of staff or the parents of any pupils who may have potentially been exposed to the virus;
3. To assist with the National response to COVID-19 and aid those with statutory public health responsibilities to act with urgency in containing any suspected or actual outbreaks.
4. We may share with Public Health England necessary information to be able to take steps to keep our pupils, parents and staff safe and to co-ordinate and effective response; and
5. To aid relevant Local Authorities with any local track and trace systems in place, including assisting them to communicate with those who may be impacted by local restrictions or lockdowns.

What information will be shared?

Bright Futures Educational Trust will share the following type of information about staff and pupils:

- The first name and surname of any member of staff/pupil believed to have been in contact with anyone who has tested positive for/has symptoms of coronavirus (in the case of pupils, the name of the parent/carer will also be shared);
- The home telephone number, mobile telephone number or e-mail address of the member of staff/pupil believed to have been in contact with anyone who has tested positive for/has

symptoms of coronavirus (in the case of pupils, the telephone numbers of the parent/carer will also be shared).

It is unlikely that we will need to share special categories of personal data, however if we are asked and we determine that it is necessary to do so we will provide relevant information such as health data which we have regarding the pupils which may require more urgent or direct contact by one of the third party organisations.

Please note: if schools are advised by Public Health England to ask pupils or staff who have had a positive Covid-19 test result and their close contacts to self-isolate; it may be necessary to disclose the name of the pupil/member of staff who has tested positive, in order to identify close contacts.

Basis for sharing

This information would be shared under the provisions of the General Data Protection Regulations (GDPR) and Data Protection Act 2018 as detailed below:

- Article 6.1c – processing is necessary for compliance with a legal obligation to which [Bright Futures Educational Trust] is the subject - which includes collecting and sharing information with statutory bodies;
- Article 6.1d - processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- Article 6.1e – processing is necessary for the performance of a task carried out in the public interest.

For any special categories of personal data shared which we believe are necessary to assist the third party organisations, we will rely on the following lawful conditions:

- Article 9.2 i - processing is necessary for reasons of public interest in the area of public health;
- Schedule 1, paragraph 3 Data Protection Act 2018 – Public Health

Any information shared with the NHS Test and Trace Service, Public Health England or a Local Authority will be provided by secure means and in accordance with our technical and organisational measures to keep personal data safe. When they contact people to advise them to self-isolate, the NHS will not tell them your identity. Should your information be shared the relevant third party organisation will have its own controller obligations under data protection law to comply with. Please consult their websites for further information or contact them directly to ask how your data will be processed once it has been shared with them.

Contact

If you would like to discuss anything in this privacy notice, please contact: [0161 941 5681] or by email to dataprotection@bfet.uk.