



Bottisham Village College
Lode Rd, Cambridge
CB25 9DL, United Kingdom
01223 811250
office@anglianlearning.org
www.anglianlearning.org

Privacy Notice for Covid-19

Under data protection law, individuals have a right to be informed about how an organisation uses any personal data that is held about them. We comply with this right by providing privacy notices to individuals whose personal data we are processing.

This privacy notice is designed to advise you about how we may seek to collect and hold additional information about you in relation to the unprecedented challenges we are facing during the Coronavirus pandemic (Covid-19).

Such information will be limited to what is proportionate and necessary, taking into account the latest and changing guidance issued by the Government and health professionals, in order to manage and contain the virus.

Who we are

Anglian Learning is the organisation which is in charge of your personal information. This means the Academy Trust is called the Data Controller.

The postal address of the Academy Trust is:

Anglian Learning
c/o Bottisham Village College
Lode Road
Cambridge
CB25 9DL

If you have queries regarding how we use your personal information you can contact our Data Protection Officer. The role of the Data Protection Officer for the Trust is being undertaken by The ICT Service. Our Data Officer at The ICT Service is Paul Stratford who can be contacted on 01480 373229 or dpo@theictservice.org.uk.

What personal data is being collected?

Personal data is being collected to determine whether individuals have experienced or are experiencing Covid-19 symptoms or are in the high-risk categories which are more vulnerable to becoming seriously ill. Basic personal data may also be collected to support the Government's track and trace procedures should a Covid-19 outbreak occur.

What is our lawful basis for processing your personal data?

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are met:

- **Article 6(1)(d)** – is necessary in order to protect vital interests of the data subject or another natural person.

Recital 46 adds that “some processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread”

- **Article 6(1)(e)** – is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller.

Section 8 (c) of the Data Protection Act sets out that such a task must be necessary performance of a function conferred on a person by an enactment or rule of law. The Academies Act 2010 and Education Act 1996, requires the provision of an education to those of a compulsory school age.

The processing of special categories of personal data, which include data concerning a person’s health are prohibited unless specific conditions can be met. These relevant conditions are below:

Article 9(2)(i) – is necessary for the reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.

Schedule 1, Part 2(6) – is necessary for reasons of public interest and for the purpose of a function conferred on a person by an enactment or rule of law; e.g. Health Protection (Coronavirus) Regulations 2020 and Coronavirus Act 2020.

Schedule 1, Part 1(3) – is necessary for reasons of public interest in the area of public health, and is carried out by or under the responsibility of a health professional, or by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law, eg Governmental guidance published by Public Health of England.

Am I required to provide my personal data under a statutory requirement?

Whilst the provision of data is not a statutory requirement and you may choose not to provide it when requested, you are strongly advised that it is in the best interests of all to provide this information to us so that we are able to take relevant steps to keep you and others safe.

The information will be managed in a confidential manner. Where Covid-19 related data is to be used for general reporting or statistics, steps will be taken to anonymise the data and general numbers used, wherever possible.

When we give your information to others

We may share your information with third parties for the reasons detailed below:

- With the Local Authority where necessary for the purpose of identifying individuals



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that are high risk and vulnerable;

- Internal teams to ensure that appropriate services and support are provided to those that need it;
- With other Health Organisations and bodies engaged in disease surveillance for the purposes of research, protecting public health, providing appropriate healthcare services to the public and monitoring and managing the Covid-19 outbreak. The information will only be processed and shared in line with the requirements of the Data Protection Act 2018.

How long we keep your information

We only keep your information for as long as we need to or for as long as the law requires us to. The information will be held by Anglian Learning until the risk to health posed by Covid 19 has been eliminated and in accordance with Government guidance.

If your data is passed to the NHS Test and Trace service in the case of a suspected outbreak, your information will be kept for up to 8 years, as part of the standard contact-tracing period set out by [Public Health England](#).

Your rights

You have these rights:

- You can ask us for a copy of the information we have about you
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although we may have good reasons why we cannot do this)
- You can ask us to limit what we are doing with your information
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

There is more information in our Data Protection Policy which is available on the Anglian Learning website <https://anglianlearning.org/financial-documents/data-protection/>

Complaints

We take any complaints about our processing of personal data very seriously.

If you think that our processing of personal data is unfair, misleading or inappropriate or have any concerns about our data processing please raise it with us in the first instance.

To make a complaint please contact Kathryn Oliver, Director of HR on koliver@anglianlearning.org. You can also contact our Data Protection Officer on dpo@theictservice.org.uk or by letter addressed to:

Paul Stratford
Speke House
17 Compass Point Business Park
Stocks Bridge Way
St Ives
Cambridgeshire
PE27 5JL

If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

On line: <https://ico.org.uk/concerns/>