

Data Impact Assessment Report

Bow School

44 Twelvetrees Cres, London E3 3QW

School Contact: Samatha Cook, School Business Manager

Project Name : Covid Response

Details from this report will be stored within the DPIA section of Infreemation for future audit purposes.

This report follows the ICO process set out in their DPIA guidance. And should be used at the beginning of any major project involving the use of personal data, or if you are making a significant change to an existing process. Integrate the formal outcomes back into your project plan

Need for a Data Protection Impact Assessment

This is a generic Data Impact Assessment, completed to support regulatory changes in relation to the Covid 19 pandemic.

This assessment only the barest minimum requirements of a full Data Protection Impact Assessment and is in place to ensure compliance with GDPR and Data Protection Legislation.

It should be read in line with any guidance issued by Bow School in relation to Track and Trace and onsite testing and potential vaccinations.

Data Type

Compliance with regulatory changes in relation to Covid 19 may required the collecting of the following special category data: -

Race, Ethic Origin, Religion, Genetics and Health data. This data is collected under the following legal basis : -

Consent will be obtained for on site testing,

Obligations in relation to employment and social security

Data will be shared/ processed in the vital interests of the data subject where there is a threat to life and the data subject is physically or legally incapable of giving consent

Processing is necessary for the reasons of substantial public interest

Processing is necessary for the protecting against serious Public Health implications

Collection will also include the following identified Personal Data :-

First Name, Surname, Maiden/Other name, Email Address, Home Address, Phone Number (s) and Date of Birth. Although this list is not exhaustive and may change depending on Government requirements. This data is collected under the following legal basis :-

Consent will be obtained for on site testing,

The School has a legal obligation to process the data.

Data will be shared/processed in the vital interests of the data subject (or another individual) where there is a threat to life

Processing is necessary for the performance of a task carried out in the public interests.

There is no expectation that there will be any systematic monitoring by the School of any individuals at this time.

Processing

The data collected relates to Students, Staff, Parent/Carers, and any visitors to the school premises, it may also include basic data in relation to family members where necessary. Information will be held internally on a secure drive if collected electronically or in a secure filing system if collected in paper format.

The data will be collected in a number of ways including :- Emails, Paper records, Electronic records, Telephone, Face to Face.

It is anticipated that the collecting will involve the information relating to 500-1000 individuals, however this may change over time.

Data will be retained in line with legal obligations and for a minimum period necessary during the Covid 19 pandemic, and will be shared with Local Authority, NHS and Government Departments as required.

Bow School will not be seeking consent to undertake this project, as the requirement is based on Emergency National Regulations introduced due to the Covid 19 Pandemic.

There are no immediate security concerns in relation to the collection of this data. The School will ensure the appropriate security measures are in place to restrict access to the data, and data will be shared in the appropriate secure way.

This process is to be implemented nationally in all secondary schools and colleges in line with current Covid 19 emergency regulations. It is necessary to ensure the health and safety of all individuals connected with the school and minimise the national risk.

Consultation process

Bow School will not be undertaking a Consultation process as the requirement is based on Emergency National Regulations introduced due to the Covid 19 Pandemic.

The collection of this data will involve the multiple members of staff, volunteers and third party health professionals.

Necessity and proportionality

Bow School has a legal obligation for collection of this data by virtue of National regulations implemented during the Covid 19 pandemic.

Staff, volunteers and third party health professionals will only collect data necessary to collect and share in line with legal obligations set out in Covid 19 Emergency regulations and Obligations.

This Data Protection Impact Assessment have been reviewed by

Louise Manthorpe, Data Protection Officer, Connetix IT and Consultancy.

21st December 2020