

Privacy Notice: Recording Customer and Visitor Details for NHS Test and Trace service

Richmond Council is working with Public Health England and other Local Authorities and third-party organisations to deliver the Richmond Contact Tracing Service.

Why we need your personal information

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. NHS Test and Trace service has been introduced to help return life more to normal by allowing the NHS to trace the spread of the virus and isolate new infections as well as giving early warning if the virus is increasing again, locally or nationally.

This Privacy Notice explains what personally identifiable information will be collected from you for this purpose, how the information will be used and protected, who it will be shared with, who shares it with us, how long we will keep it and what your rights are.

What Information we ask for

If you visit Council premises, we will invite you to provide basic information and contact details. These will be:

- the names of all customers or visitors, or if a group, the name of one member
- a contact telephone number for each customer or visitor, or one number in the case of a group
- date of visit and arrival and departure times

In addition, if you are meeting with only one member of Council staff, their name will also be recorded with your information.

If you inform us that you do not want your details shared for the purposes of NHS Test and Trace, you can choose to opt out, and if your information used for booking purposes with NHS Test and Trace.

Why we are allowed to use your personal information

The lawful basis for the processing and sharing of personal data for the purposes described above will be the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018):

GDPR

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

Article 9(2)(i) 'processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare'

Data Protection Act 2018.

Schedule 1. Par. 6. Governmental purpose for health and social care purposes

Using your data

The Council will use the above legal bases for processing in order to help you and your family and protect your vital interests. By keeping a record of your visits to us and sharing this information with NHS Test and Trace when requested helps identify those who may have been exposed to the virus.

Record Keeping

We will only share information with NHS Test and Trace if it is specifically requested by them. They have asked us to retain your information for 21 days from the date of your visit which reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing.

Information Security

The Council has put in place appropriate security measures to prevent the unauthorised processing of personal data and the accidental loss of or damage to personal data from the point of collection to its destruction. These measures are continually updated and apply to the information you provide for this purpose to enable us to maintain confidentiality, integrity and availability of personal data at all times.

Your Rights

You have the right to request access to the personal information we hold about you; to be informed about the collection and use of your personal information, for the information held to be corrected (where the law permits) and to ask us to restrict the processing of your personal information. In certain circumstances you have the right to object to the processing of your personal information. This information is not subject to any automated decision making.

If you have any concerns or questions about how we are looking after your personal information or to exercise your rights, please contact our Data Protection Officer at: dpo@richmondandwandsworth.gov.uk.

Further information

For Government information about how NHS Test and Trace works see:

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

For Guidance from the Department of Culture Media and Sport and partner organisations see:

<https://www.gov.uk/government/collections/guidance-for-dcms-sectors-in-relation-to-coronavirus-covid-19> (Includes grassroots sport, gym/leisure and library facilities)

For the Public Health England NHS Test and Trace Privacy Notice see:

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