



PRIVACY NOTICE: COVID-19 TESTING REFERRALS

This privacy notice outlines how Pembrokeshire County Council (as a Data Controller) will collect, use and protect personal data in order to refer you for COVID-19 testing.

Why we need your information (purpose of processing)?

In accordance with Welsh Governments COVID-19 testing process, Pembrokeshire County Council is responsible for coordinating information about social care service user, critical workers, or a household member of a critical worker, who would like to be tested for COVID-19. Referrals are coordinated via Pembrokeshire County Council, testing is undertaken via Hywel Dda Health Board and processed in Public Health Wales laboratories.

This privacy notice applies to social care service users and all critical workers, or members of their household, who are employed or contracted to undertake work on behalf of Pembrokeshire County Council.

What personal data is being collected?

In order to submit a referral, we require the following information:

- Name, address, date of birth and national insurance number
- Contact telephone number
- Health information (symptoms)

In order to assist Pembrokeshire County Council in undertaking our responsibilities as an employer, Social Care provider and commissioner of care provision, we request that you notify us of your test results.

How do we collect information about you?

If you are an employee of Pembrokeshire County Council we will contact you by telephone to collect the information.

Service Providers will collate information regarding service users, critical workers, or household members of critical workers and will submit this information to Pembrokeshire County Council.

What is our legal basis for processing your personal data?

You are not obliged to undergo testing, however, if you wish to be tested then your referral data will be processed in accordance with the following legal bases:

- 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)(h) - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.
- 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.

The following legal bases apply for recording the outcome of test results:

- Article 6(1)(b) – processing is necessary for the performance of a contract to which the data subject is party.
- Article 6(1)(d) – processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- Article 9(2)(h) – processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.

How long will my personal data be retained by the Council?

Pembrokeshire County Council will only keep your information for as long as is necessary, taking into account of Government advice and the on-going risk presented by COVID-19. At a minimum the information outlined in this privacy notice will be kept for the duration of the COVID-19 response and relevant retention timescales.

Who will my data be shared with?

Your data will be shared with Hywel Dda Health Board who will liaise with you to schedule an appointment. Hywel Dda Health Board will send testing samples to Public Health Wales, who are processing all tests in Wales.

Your Rights

Under data protection law, you have rights including:

- Your right to rectification – you have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- In certain circumstances (e.g. where accuracy is contested), to request that the processing of your personal data is restricted;
- In certain circumstances you have the right to object to the processing of your personal data;
- You have the right of access – you have the right to ask us for copies of your personal data. To make a request, please contact:

Access to Records
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: accesstorecords@pembrokeshire.gov.uk Telephone: 01437 775798

Complaints and Queries

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: dataprotection@pembrokeshire.gov.uk

Telephone: 01437 764551

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

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

Our Contact Details as Data Controller are:

Pembrokeshire County Council, County Hall, Haverfordwest, Pembrokeshire, SA61 1TP. Telephone number: 01437 764 551 or enquiries@pembrokeshire.gov.uk

Our Data Protection Officer's information is detailed above in the Complaints and Queries section.

Changes to this privacy notice

We keep our privacy notice under regular review.