



## PRIVACY NOTICE CV19 Contact Tracing Team within Pembrokeshire County Council

### The purpose of this notice

This privacy notice explains how Pembrokeshire County Council (as Data Controllers) will collect, use and protect personal data specifically with regards to Contact Tracing. Pembrokeshire, in line with all other Local Authorities and Health Boards in Wales, is using the Test Trace Protect Customer Relationship Management (CRM) database developed by NHS Wales Informatics Service (NWIS). Where an individual has a positive Covid-19 test the test result is recorded on the system and cases are distributed based on the individuals' postcode to the relevant local authority.

Personal information is also shared across organisations for the purpose of responding to the critical public health crisis in respect of the COVID-19 pandemic. The personal data in respect of this service is processed for three purposes, these are to:

**Test;** the testing of critical workers, citizens, members of their household and contacts, across Pembrokeshire at Community Testing Units, Mobile Testing Units and / or at home.

**Trace;** using results of confirmed cases to make contact with individuals and

- Identify details and make contact with household members,
- Identify individuals who in the period 48 hours prior to and 7 days after the possible or confirmed symptoms that the individual may have been in contact with
- Processing details of movements, and locations which will be linked directly to the individual, i.e travelling, shopping

**Protect;** enhancing the public health surveillance and response system to enable the prevention of infection and the tracking of the virus as restrictions are eased. The Contact Advisor Team will make daily contacts with the Primary and Secondary Contacts to monitor how they are feeling and to monitor whether any secondary contacts become symptomatic.

There may be occasions when the local Contact Tracing team here in Pembrokeshire will share your personal data with other sections and teams within the Local Authority to assist in responding to this pandemic.

- If you or a family member requires support with food, medicine or your care whilst isolating we will need to share your personal information with our Community HUB team or Safeguarding Team in Social Services so they can assist you.
- If you are a pupil at a school your personal data will have been shared by your school with the Contact Tracing Team to ensure all affected children within school 'bubbles' or school transport are identified and communicated with as regards isolation and hygiene advice.

- If you a staff member at the school your personal data will have been shared by your school with the Contact Tracing Team to ensure we are able to ascertain who you may have taught or come in contact with in school.
- Personal data will be shared with our Public Protection, Communicable Disease Team in situations where there is non-compliance with appropriate legislation related to isolation and Contact Tracing.
- Personal data may be obtained by your employer to ascertain if you have been in close contact with an infected person at work; for example ascertaining shift rota's or details of work patterns and work locations to enable us to identify and protect people within the workplace.
- Personal data will be shared with our Hywel Dda colleagues if we require advice in relation to any clinical or health need you may have. In this instances we will advise you we will be contacting the Health Board on your behalf.
- Personal data will be shared with Public Health Wales if you have recently travelled and we need further details on flight, trains information and/or travel destinations. We will advise you if this is the case.
- We may request your personal data from a location or business if a cluster is identified at that location or where someone who is positive has recently visited or worked. Please see link for further information; <https://gov.wales/keeping-records-staff-customers-and-visitors-test-trace-protect#section-46241>
- Personal data will be with Housing Support services if your situation requires it. We will advise you if this is the case.
- Personal data will be shared with Educational Support establishments if your specific situation requires it. We will advise you if this is the case.
- We will share personal data with our internal Incident Management Centre to enable us to manage our response to this disease if required.
- We will need to share your personal data with our Translation and Interpretation Provider to enable us to communicate with you in your native language to provide Contact Tracing advice and guidance. We will advise you of this at the start of any conversation.

## **The personal data being processed**

To trace the contacts of people with COVID-19, contact tracers will need to collect personal data. The data we will collect about you will include;

- Full name
- Date of birth
- Gender
- NHS number
- Full Address including postcode
- Telephone number and email address
- Details on COVID-19 symptoms
- Details on COVID-19 Test Results
- Disability and ethnicity data
- Places you've visited
- Names & Addresses of people you have been in close contact with

If the contact details of those you have been in close contact with are not known we may need to contact employers for details.

## **How long the personal data is kept**

The data we collect for people tested positive with Covid-19 will be held for 7 years.

The data collected on contacts of people with COVID-19 but do not have any symptoms will be held for the minimum retention period of 5 years.

Information held in respect of Public Protection Communicable Disease Investigations will be held for 7 years.

## **Information used for other purposes**

Information held may also be used for:

- Understanding COVID-19 and risks to public health, trends in COVID-19 and such risks, and controlling and preventing the spread of COVID-19 and such risks
- Identifying and understanding information about patients or potential patients with or at risk of COVID-19
- Delivering services to patients, clinicians, the health services
- Research and planning in relation to COVID-19 (including potentially being invited to be part of clinical trials)
- Monitoring the progress and development of COVID-19

## **The legal basis for processing your personal data**

The legal basis for processing your personal data for contract tracing purposes under the General Data Protection Regulation (GDPR) is:

- Article 6(1)(e) – Task carried out in the public interest or in the exercise of official authority vested in the controller

For special category data an additional legal basis is required and is:

- Article 9(2)(i) - Processing must be 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 health care and of medicinal products or medical devices)
- Article 9(2)(h) Provision of preventative or occupational medicine, health or social care or treatment, or the management of health or social care systems
- Article 9(2)(g) Substantial public interest

Data Protection Act 2018 - Schedule 1, Part 1, (2) (2) (f) - Health and social care purposes

Data Protection Act 2018 - Schedule 1, Part 1, (3) (a) - necessary for reasons of public interest in the area of public health

Data Protection Act 2018 - Schedule 1, Part 2 (6) Statutory and government purposes

### **Other applicable legislation**

- Public Health (Control of Disease) Act 1984
- The Health Service (Control of Patient Information) Regulations 2002
- Coronavirus Act 2020
- The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020

### **Your rights**

Under data protection law, you have rights including:

- Your right to rectification - You have the right to ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you believe it is incomplete.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
- Your right of access - You have the right to ask us for copies of your personal information. To make a request, please contact:

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

Email: [acesstorecords@pembrokeshire.gov.uk](mailto:acesstorecords@pembrokeshire.gov.uk) Telephone: 01437 775798

You may approach Public Health Wales, Hywel Dda or Pembrokeshire County Council to exercise your information rights in relation to that personal information being processed in the delivery of Test, Trace and Protect activities. We will then advise you who is dealing with your request and will be responding to you.

**Complaints or Queries:**

If you have any concerns or complaints over the handling of your personal data please contact us in the first instance, our details are:

Jo Hendy, Data Protection Officer  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
SA61 1TP

Email: [dataprotection@pembrokeshire.gov.uk](mailto:dataprotection@pembrokeshire.gov.uk)

Telephone: 01437 764551

You also have the right to complain to the Information Commissioner's Office using the following details:

Information Commissioner's Office – Wales  
2nd Floor, Churchill House  
Churchill Way  
Cardiff  
CF10 2HH

Telephone 0330 414 6421 Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)