

COVID19 PRIVACY NOTICE

Short Privacy Notice – COVID19

North Lincolnshire Council is collecting and using existing personal data related to COVID19 to assess and provide support to individuals who are in high risk categories and would be considered vulnerable, if infected with the COVID19 virus and to mitigate the risks associated with COVID19.

Personal data will be handled in accordance with the General Data Protection Regulation / Data Protection Act 2018 and other relevant legislation, and will not disclose your data to any other third party, unless allowed or required to do so by legislation. For further details about the processing of your personal data please see the [Full Privacy Notice](#) and other information on our Data Protection and Privacy web page.

Full Privacy Notice – COVID19

Data Controller

North Lincolnshire Council.

Data Protection Officer

Our Data Protection Officer is Phillipa Thornley and she can be contacted by email using informationgovernanceteam@northlincs.gov.uk or at Church Square House, 30-40 High Street, Scunthorpe, DN15 6NL.

Contact details

North Lincolnshire Council – COVID19 Task Group
Church Square House
30-40 High Street
Scunthorpe
North Lincolnshire
DN15 6NL

Email: customerservice@northlincs.gov.uk

Telephone: 01724 297000

Website: [North Lincolnshire Council Coronavirus COVID19](#)

Purpose of this Privacy Notice

This Privacy Notice tells you about how North Lincolnshire Council is using personal data in relation to the COVID19 pandemic covering high risk groups of individuals, community volunteers, employees and local businesses.

What do we mean by personal confidential data?

Personal data relates to living persons and is information that can be used to identify an individual such as name, date of birth, address or postcode.

What data do we have?

1. Support to high risk groups:

We collect and process the following personal data:

- Contact details – including name, date of birth and address
- Details of the household – including who the lead person is and contacts details
- About household members – number of people in the house, details of vulnerability, support required and any support already in place.
- Support Requested and in place.
- Employment and education details

We collect and process the following special category personal data:

- Health information to determine the support required

This data is collected to assess and provide support to North Lincolnshire individuals who it is considered would be vulnerable if infected with the COVID10 virus.

The Humber Local Resilience Forum have declared a major incident in relation to COVID 19 and the Civil Contingencies Act 2004 sets out a clear set of roles and responsibilities for those involved in emergency preparation and response at a local level. This includes care and support for those who are vulnerable. During the response to this public health emergency Category 1 and Category 2 responders have a duty under the Civil Contingencies Act to share information with other responder organisations. Please see the [gov.uk](https://www.gov.uk) website for further information.

The type of personal data being used currently includes that relating to Adult Social Care, Services for Children, Education and Housing and the categories of information being used is as stated in point 1. above.

2. Vaccination Programme for vulnerable individuals

We collect and process the following personal data:

- Forename, surname, gender, date of birth and postcode.

We collection and process the following special category personal data:

- NHS number.

Personal data about those providing care to vulnerable individuals is collated by the council and shared with Public Health partner organisations so these individuals can be offered a COVID19 vaccination.

3. Community volunteers:

We collect and process the following personal data:

- Contacts details – including name, date of birth and address

We collect and process the following special category personal data:

- Health information to determine if the volunteer or anyone they are in contact with would be considered high risk if infected with COVID19.

This personal data is being collected and processed to assist with co-ordinating a community response to the COVID19 pandemic.

4. Deceased individuals

Registrar deceased individual data is being shared with the council's Public Health Team to enable up to date judgements to be made on death management needs to inform the COVID19 planning response. This data would usually be received from NHS Digital after around 3 to 4 months as the Primary Care Mortality Dataset. It should be noted that the data will be anonymised where possible and that the UK GDPR no longer applies to identifiable data that relate to an individual once they have died, but it is likely there would still be a duty of confidentiality.

5. Employees and the vaccination of frontline workers:

Personal and special category personal data that relates to employees is being processed:

- To enable business continuity planning and deployment of resources to critical services including the council's community response, details of employees (or members of their household) identified as falling in 'at risk' or 'severe risk' categories and who would be considered particularly vulnerable if infected with the COVID19 virus.
- Health data of employees affected by the impact of COVID19 either through illness due to confirmed COVID19, displaying COVID19 symptoms or related self-isolation for the purposes of managing resources, exercising our duty of care as employer and protecting public health.
- Details of North Lincolnshire Council's frontline workers is being collated to identify critical employees eligible for a COVID19 vaccine and shared with Public Health partners so they can offer these employees a vaccination. Once frontline workers have been vaccinated the council is required to maintain a record of who has been vaccinated.

6. We collect and process the following information about businesses

We collect personal information relating to local businesses to enable us to understand the impact on them, what assistance they have accessed and whether there is further help we could give.

7. Test and Trace Support Payment Scheme

From 28 September 2020 individuals will be entitled to a Test and Trace Support Payment of £500 if they:

- Have been told to stay at home and self-isolate by NHS Test and Trace, either because they have tested positive for COVID-19 or have recently been in close contact with someone who has tested positive.
- Are employed or self-employed.
- Are unable to work from home and will lose income as a result.
- Are currently receiving Universal Credit, Working Tax Credit, Income-based Employment and Support Allowance, Income-based Jobseeker's Allowance, Income Support, Housing Benefit and/or Pension Credit.
- Local authorities will also be able to make a discretionary £500 lump sum payment in exceptional circumstances.

The council's Local Taxation and Benefits Team will access or receive information from the NHS Test and Trace data system CTAS for the purposes of confirming eligibility for the Test and Trace Support Payments scheme.

Please note that as of 16th August 2021, fully vaccinated adults and children under 18 years and 6 months will no longer be required to isolate if they are identified as a contact of a positive case, and therefore will not be eligible for a Test and Trace Support Payment. The eligibility checker we access will therefore show if a person making an application is fully vaccinated, and therefore if their claim should be rejected.

The Department for Works and Pensions (DWP) Searchlight system and the Local Taxation and Benefits Council Tax and Benefit systems (Northgate and Civica) will also be used to confirm eligibility.

Employers may be contacted to verify information supplied by applicants. Details of individuals suspected of not following the scheme rules will be passed to the Police who will determine what follow up action to take.

8. Other

- Any other personal data the council is asked to collect by health or government authorities or considers would be beneficial to collect to mitigate the risks associated with COVID19, including health risk, economic risks and social risks.
- Details of COVID19 tests carried out are shared with the council for the prevention of and monitoring of outbreaks of the virus. The information shared may include a unique identifier, sex, age, postcode, ethnic group, occupational group and test date.
- Personal data related to public venues is being collected to comply with Test and Trace government requirements around the opening of these venues. This is to assist with identifying and containing localised outbreaks. We collect name, telephone number and date/time of the visit for both visitors to a venue and staff. This is kept for 21 days and is provided to the NHS Test and Trace service if required.

In all cases the data collected is limited to what is considered proportionate and necessary.

What do we do with the data we have?

We use the data to help us to:

- Assess and provide support or services to individuals who are in a high risk group, because they would be considered vulnerable if they became infected with the COVID19 virus.
- To co-ordinate an effective response to COVID19 from the council and the wider community.
- To fulfil the duty of care to employees and ensure business continuity.
- To determine eligibility to schemes put in place to support those affected by COVID-19.

Who do we share your data with?

We may share personal information with organisations, including:

- Council teams to provide the support required
- Occupational Health
- Voluntary and community groups to provide the support required
- Healthcare service providers, welfare professionals, and partner organisations
- Care providers
- Education providers
- Housing providers
- Bordering local authorities
- Employers
- Police
- Government agencies, such as the Department of Health
- Category 1 and 2 responders defined under the Civil Contingencies Act.

How do we get your personal data and why do we have it?

We collect personal data in ways including:

- From potentially vulnerable individuals
- From others making a referral
- From employees
- From council departments
- From other organisations, such as health and care providers

In addition we are using some existing personal data from our business systems.

The lawful bases we are relying on to process personal data are:

- (a) To perform a task in the public interest – Article 6(1)(e):
- (b) To protect an individual’s vital interests – Article 6(1)(d).

The lawful bases we are relying on to process special category personal data are:

- (a) Substantial public interest – Article 9(2)(g).
This is permitted if one of the conditions in Part 2 of Schedule 1 of the Data Protection 2018 can be met. In this instance those most likely to be met are:

- To fulfil an explicit statutory or government purpose
- Protect the public
- Support for individuals with a particular disability or medical condition
- Safeguard children or individuals at risk
- Safeguard the economic wellbeing of certain individuals

(b) Employment, social security and social protection if authorised by law – Article 9(2)(b).

This is permitted if one of the conditions in Part 1 of Schedule 1 of the Data Protection Act 2018 can be met. In this instance Schedule 1, condition 1 is met – necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or a data subject in connection with employment, social security or social protection. The legislation that applies includes the following:

- Local Government Act 1972 – allows data sharing to protect and promote the well-being of the area.
- Care Act 2014 – allows data sharing to promote individual well-being, prevent the need for care and to support and promote the integration of health and social care.
- Children’s Act 1989 – allows data sharing to safeguard and promote the wellbeing of children.
- Digital Economy Act 2017 – allows sharing of data to improve public service delivery.
- Civil Contingencies Act – allows sharing of data to comply with duties to plan, prepare for and respond to emergency situations.
- We have also been given the authority to process confidential patient information under section 3(4) of the Health Service (Control of Patient Information (COPI) Regulations 2002. The Secretary of State for Health and Social Care has issued a notice to local authorities to enable them to process this information currently until September 2020. A copy of the [COPI](#) notice is on the gov.uk website.

(c) For the provision of health or social care or treatment – Article 9(2)(h).

This is permitted if one of the conditions in Part 1 of Schedule 1 of the Data Protection Act 2018 can be met. In this instance Schedule 1, condition 2 is met – necessary for health and social care purposes

(d) For public health reasons, such as protecting against serious cross-border threats to health – Article 9(2)(i).

This is permitted if one of the conditions in Part 1 of Schedule 1 of the Data Protection Act 2018 can be met. In this instance Schedule 1, condition 3 is met – necessary for reasons of public interest in the area of public health.

Please note that we will not process your personal data for a purpose that is incompatible with the reason it was collected for unless this is allowed or required under Data Protection legislation.

Can I withdraw my consent?

Yes, where personal data has been collected and used on the lawful basis of consent.

How do we store your information and for how long?

Our employees have contractual obligations of confidentiality, enforceable through disciplinary procedures and receive appropriate training on confidentiality and other aspects of Information Governance.

We take organisational and technical measures to ensure the information we hold is secure – such as using secure locations, restricting access to authorised personnel and protecting personal and confidential information held electronically. We only exchange personal confidential information using secure methods, such as encrypted email.

Your personal data is retained in accordance with national guidance and our legal obligations. In this instance we will retain your personal data for as long as is necessary to provide the necessary services or support, and to respond to any queries or complaints. The personal data may be anonymised and kept for a longer period for statistical purposes.

Your Data Protection Rights

Under Data Protection law, you have rights including:

- **Your right of access** - to ask us for copies of your personal information.
- **Your right to rectification** - 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.
- **Your right to erasure** - to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing** - to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at inforequest@northlincs.gov.uk, 01724 296224 or North Lincolnshire Council, Church Square House, 30 – 40 High Street, Scunthorpe, DN 15 6NL if you wish to make a request.

How to Complain

The main point of contact at the council for Data Protection matters is our Data Protection Officer (DPO). If you have any Data Protection concerns about the collection of personal data for COVID19 and wish to make a complaint please contact our DPO, as follows:

Phillipa Thornley

Email: informationgovernanceteam@northlincs.gov.uk

Telephone: 01724 297000

Post: North Lincolnshire Council, Church Square House, 30-40 High Street, Scunthorpe, DN15 6NL

If you remain unhappy you can also complain to the ICO, as follows:

Website: [Information Commissioner's Office](#)

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

Telephone: 0303 123 1113