

Test and Trace

Wiltshire Council Privacy Notice relating to NHS Test and Trace

Service description

Wiltshire Council will collect personal data, as requested by the Government, to help with the NHS Test and Trace programme in relation to Covid-19. Government advice is [available here](#).

What is test and trace?

COVID-19 is an infectious disease affecting the whole of the country. The virus that causes COVID-19 is a coronavirus. Infectious diseases present a serious and ongoing threat to public health. If not controlled, they can infect large numbers of people and, depending on the disease and other factors, can result in ill-effects ranging from relatively minor symptoms to early death.

Contact tracing is an important way of controlling the spread of infectious diseases. It involves identifying and tracing all the people who have been in contact with a person who has been infected. Depending on the nature and duration of the contact, these contacts may require advice or treatment to prevent the disease spreading further.

Processing activity

The purposes for which your data will be used:

- To keep a record of who has visited our venues and when (this includes visitor and staff)
- To share this information with NHS Test and Trace if requested

Information requirements

In relation to staff we will record:

- the names of staff who work at the premises
- a contact phone number for each member of staff
- the dates and times that staff are at work

In relation to customers and visitors we will record:

- the name of the customer or visitor. If there is more than one person, then you can record the name of the 'lead member' of the group and the number of people in the group
- a contact phone number for each customer or visitor, or for the lead member of a group of people
- date of visit, arrival time and, where possible, departure time
- if a customer will interact with only one member of staff, the name of the assigned staff member should be recorded alongside the name of the customer

Please note you do not have to give us this information in relation to NHS Test and Trace, and no other information will be requested for this purpose.

Lawful basis

Test and Trace

Our **lawful basis** for processing your personal information are:

- It is necessary for the performance of a task in the public interest as part of this council's response to the pandemic (Article 6(1)(e) of the General Data Protection Regulation 2016).

In addition, if your attendance at our venues would reveal protected characteristics about you (known as Special Category Data) one or more of the following basis will apply.

- Your explicit consent, (Article 9(2)(a) of GDPR).
- Processing is necessary for the purposes of the provision of health or social care relevant to the council response to the pandemic.
- Processing is necessary for reasons of public interest in the area of public health (article 9(2)(i) of GDPR).

If consent applies, the venue will let you know.

Your rights

Your rights depend on the lawful basis we are relying on. More information is [available here](#).

Data Processors

Wiltshire Council uses data processors who provide software and services to us. We may use these data processors to collect or store your information.

Data sharing

Who else might we share your personal information with?

Wiltshire Council will be processing your personal information to deliver relevant and appropriate data to the (Wiltshire) NHS Contact Tracing Service. Their Call Centre will then be responsible for contacting individuals who have tested positive for COVID-19 and their Contacts. It is therefore necessary to share data for this purpose.

The Contact Tracing Service are permitted to share your information in accordance with rules set by the local authorities which are designed to ensure that it will only take place where it is necessary to do so and will consider the minimum level of information that needs to be shared in each circumstance.

Your information will be treated with strict confidence and only disclosed where it is necessary to prevent a COVID-19 outbreak by investigating an establishment for potential Contacts, the minimum amount of personal information will be shared if necessary with:

- Other Local Authorities to enable Environmental Health Officers to assist the establishment and provide advice to contacts
- Sub-contractors to deliver support/advice in key sectors (e.g. care homes, education, prisons, housing)
- We may need to disclose your name and the fact that you have tested positive to your employer or the operator of an institution where you have spent significant time if this is necessary to avoid or limit a COVID-19 outbreak in the workplace.

Retention

Test and Trace

We keep your personal information for the minimum period necessary. We will normally destroy information held in relation to Test and Trace after 21 days, as recommended by the Government. Please note that if this same information is already held for other purposes, it will continue to be retained and used for those purposes.

The information outlined in this Privacy Notice will be in accordance with our Retention Policy. All information will be held securely and disposed of confidentially.

Your information used for other purposes

Your information may also be used for different purposes that are not directly related to your health and care. These include:

- Research into COVID-19
- Planning of services or actions in response to COVID-19
- Monitoring the progress and development of COVID-19

Whenever possible, information that does not directly identify you will be used for these purposes, but there may be times when it is necessary for your personal information to be used. Any releases of information that identify you will be lawful and the minimum necessary for that purpose.