

# Privacy Policy – Covid-19

## What is this notice for?

This privacy notice explains how the Trust may seek to collect and hold additional information about you in relation to the unprecedented challenges we are all facing during the Coronavirus pandemic (Covid-19). It supplements our main [Privacy Policy](#).

We may seek to collect and process your personal data in response to the recent outbreak of Coronavirus, which is above and beyond what would ordinarily be collected from you, to ensure the safety and well-being of our staff and the general public.

Such information will be limited to what is proportionate and necessary, taking into account of the latest guidance issued by the Government and health professionals, in order to manage and contain the virus.

We are required to:

- keep a temporary record of staff/visitors for a period of 21 days
- provide relevant information to the NHS Test and Trace service if required for contact tracing and the investigation of local outbreaks

## What personal data is being collected?

We collect the following information from individual visitors:

- name
- telephone number
- date and time of visit

If you are a member of staff we collect Personal data to determine whether individuals have experienced or are experiencing Covid-19 symptoms or are in any of the high-risk categories which are most vulnerable to become infected and seriously ill. We may also collect sensitive category information.

## Who is processing your data?

The Trust acts as a data controller in respect of the personal data we process. Our Data Protection Officer is Tom Deards, Head of Legal and Governance Services and he can be contacted by emailing [information.request@canalrivertrust.org.uk](mailto:information.request@canalrivertrust.org.uk).

## How we will use the information we hold about you?

Information will only be used if we are asked to provide the NHS Track and Trace service with the contact details of individuals who have identified with or may have been exposed to COVID-19.

This allows the Test and Trace service to:

- provide testing for anyone who has symptoms of COVID-19 to find out if they have the virus
- contact anyone who has had a positive test result to help them share information about any close recent contacts they have had; and
- alert those contacts, where necessary, to notify them that they need to self-isolate to help stop the spread of the virus.

## Legal basis for processing your personal data?

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are:

- Article 6(1)(c) – ‘Legal Obligation’ in that we have a legal obligation under the Health and Safety at Work Act 1974 to ensure the safety of both staff and visitors.
- Article 6(1)(e) – ‘Public Task’ in that is necessary for the performance of a task carried out in the public interest
- Where a visitor notifies us of a positive test for COVID-19 we will share this data with the NHS Test and Trace service as qualified by the Data Protection Act 2018 Schedule 10(2) and Schedule 1 Part1 Paragraph 3 and the Data Protection Act 2018 Schedule 10(3) and Schedule 1 Part2 Paragraph6(2)(a).

## Am I required to provide my personal data under statutory requirement, or am I obliged to provide it?

Whilst the provision of data cannot be mandated, you are strongly advised that it is in the best interests of all to provide this information to us so we are able to take relevant steps to keep you and others safe.

The information will be managed in a confidential manner. All information will be held securely and processed on a ‘need to know’ basis by only a limited number of individuals. If there is a need to disclose outside of this, the minimal amount of personal data will be used.

## Who we will share your information with?

Your personal information will only be shared with the NHS Test and Trace system and will not be shared with any other party. This will be shared:

- on request should NHS Track and Trace identify an individual who has attended a office or venue and been tested as positive for COVID-19, we will then provide details of contact information for staff and visitors who may have come into contact with the individual
- we will contact the NHS Track and Trace service should a visitor who has attended an office or venue inform us that they have tested positive for COVID-19 to provide them with details of the individuals who may have come into contact

We will not share your information with anyone else unless required to do so under additional legal requirements, for example to assist the government in containing the spread of Covid-19. This may be where we are required to do so by law, to safeguard public safety, and in risk of harm or emergency situations.

Information will not be shared with other parts of the Trust for any other non-related purposes.

Any information which is shared will only be shared on a need to know basis, with appropriate individuals. Only the minimum information for the purpose will be shared.

You can choose to opt out of giving your details, but we would appreciate your support to prevent local lockdowns.

## How long will my personal data be retained by the Trust?

We will only keep your contact information for 21 days in order to respond to NHS Test and Trace data requests. Staff shift and attendance records will be kept in line with our corporate retention schedule.

Health information provided by you in relation to this outbreak of Coronavirus will not be used for any other purpose.

When the information is no longer needed for this purpose, it will be securely deleted.

## Your rights

If you are not happy about the way your personal data is being processed you can complain directly by emailing [information.request@canalrivertrust.org.uk](mailto:information.request@canalrivertrust.org.uk).

If you would like to know more about your information rights or how to exercise them, view the full [privacy notice](#).

Further advice and guidance from the ICO on this issue can be found on the [ICO website](#).

**Last edited: July 2021**