



Privacy Notice

Cumbria COVID-19 Local Contact Tracing System

All of the information you give us will be kept safe and secure whether it is written or on a computer system. We will treat any personal information confidentially and will comply with the Data Protection Act 2018. This means that, if we keep any of your personal data we must:

- tell you what information we need to collect from you
- only use the information for the reason we have agreed with you
- not ask for more information than we need to provide the services
- let you see any information we have collected about you, on request
- keep the information safe, secure and confidential
- personal information will be deleted in accordance with council policy

About Us

Cumbria COVID-19 Local Contact Tracing System has been established to:

- comply with the aims of Cumbria Testing and Contact-Tracing Strategy, and
- complement the national COVID-19 Test, Track and Trace system.

Effective data sharing is crucial to supporting the needs of the community and the work of:

- Cumbria COVID-19 Call Centre (Central Point of Access)
- Cumbria Incident Management Hub
- Local Contact-Tracing Hub (Cumbria Sexual Health Services)
- Outbreak Control Team
- Local Contact-Tracing Intelligence Cell

These groups will co-ordinate a range of activities including:

- **Individual Contact-Tracing:** case-identification, contact-finding, follow-up isolation advice and testing for high-risk contacts, and

- **Incident Management:** local identification of potential clusters/outbreaks, response to national incident referrals

Local contact-tracing will be launched in a number of phases, allowing for changes in process as the national contact-tracing system comes online and scales up its activity.

The overall aims of contact-tracing will be to:

- Reduce the spread of COVID-19 in Cumbria through prompt identification of close contacts of individuals with COVID-19, risk assessment of those contacts, and provision of advice on self-isolation and testing.
- Provide appropriate self-isolation, self-monitoring, and infection-prevention advice to contacts of individuals with COVID-19.
- Conduct contact-tracing activities relating to potential clusters and outbreaks of COVID-19 in schools, large employers, and community settings.
- Complement, not replace the national test and trace system.
- Inform the response of Cumbria outbreak control teams through timely data-sharing and follow-up

Data Collection

Data will be collected initially by referrals made to Cumbria COVID-19 Call Centre and then, depending on an assessment of COVID-19 status referred to the Local Contact-Tracing Hub.

Data may also be collected from the COVID-19 National Contact Tracing System in relation to complex incidents and outbreaks.

Data Categories

The following data is required by the Local Contact Tracing System to meet legal obligations and to enable officers to reach informed and robust recommendations and decisions:

- name
- date of birth
- postal address including postcode
- email address
- mobile or landline telephone number

Depending on COVID-19 status we may also collect, store and use the following 'special categories' of more sensitive personal information:

- gender
- COVID-19 status i.e. self-isolating, shielding
- health i.e. symptoms
- social/sexual or religious activity
- employment status i.e. key worker status, work location, employer name

Legal Basis for Processing Data

The Local Contact Tracing System relies on the processing of your personal data (such as name, age, address), and to do this we rely on the following legal bases:

- **GDPR Article 6(1)(a)** the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- **GDPR Article 6(1)(c)** processing is necessary for compliance with a legal obligation to which the controller is subject
- **GDPR Article 6(1)(d)** processing may be necessary in order to protect the vital interests of the data subject or of another natural person
- **GDPR 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

Where the council is relying on GDPR Article 6(1)(c) all [Relevant Legislation](#) is listed below.

Depending on COVID-19 status the System also relies on the processing of more sensitive 'special categories of personal data' (such as health, race, ethnicity, sexual orientation) and to do this we rely on the following legal bases:

- **GDPR Article 9(2)(i)** processing is necessary for reasons of public interest in the area of public health

The Local Contact-Tracing Intelligence Cell will access data specifically to analyse outbreak trends and rely on the following legal basis:

- **GDPR Article 9(2)(j)** processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

Relevant Legislation

These legal bases above are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities, including:

- Health Protection (Notification) Regulations 2010

Data Sharing

We may share your information with the following organisations depending on your COVID-19 status:

- Public Health England
- Environmental Health (District/Borough Councils)
- NHS
- Schools
- Employers

We do not sell your information to other organisations. We do not move your information beyond the UK. We do not use your information for automated decision making.

We will sometimes need to share the information we have with other parts of the council or other public bodies or organisations. The council will make all reasonable efforts to contact you if this processing is going to have an impact on rights or privacy, but overriding public health considerations may affect this.

Data Security and Retention

The information you supply will be kept on a secure council system and can only be accessed by authorised employees within the Cumbria COVID-19 Call Centre.

Your personal information will be managed in accordance with the council's Retention and Disposal Schedule. Due to the nature of this incident some data may be retained for historic purposes.

Complaints

If you have any concerns about the information contained in this Privacy Notice please contact: IPC@cumbria.gov.uk.

If you have concerns about the way the council has processed your data please contact our Data Protection Officer via dataprotection@cumbria.gov.uk.

Last Updated: June 2020