

PHA PRIVACY NOTICE – COVID 19 CONTACT TRACING PROGRAMME

Introduction

The Department of Health 'Covid-19 Test, Trace and Protect Strategy' (27 May 2020) sets out the public health measures to be put in place to help contain and reduce the spread of Covid-19 and minimise the risk of a second wave of infection. Contact Tracing is a fundamental element of this Strategy.

This privacy notice describes the type of personal data collected and held by the Public Health Agency (PHA) for the Contact Tracing Programme, the way that it is used and your rights in respect of this.

Contact Tracing Programme

The Contact Tracing Programme is designed to break the chain of transmission of the virus by contacting people who have had a positive test result for covid-19, tracing people who may have become infected by being in close contact with them and supporting all those people to self-isolate so that, if they have the disease, they are less likely to transmit it to others.

All members of the public (aged 5 and above) with symptoms of covid-19 can book a test via the National Covid-19 Testing Programme. You will be informed of the result of your test either by email or text SMS.

If your test is positive, you will also be contacted by telephone by a health professional (Contact Tracer) from the NI Contact Tracing Centre. This is to allow the Contact Tracer to identify, through discussion with you, anyone who has had close contact with you during the time that you were likely to be infectious (Contacts). Contacts may include someone:

- Who lives with you,
- who has been in direct contact with you or your bodily fluids (for example droplets from a cough or sneeze), or
- who has been within 2 metres for more than 15 minutes.

You will also be given relevant public health advice and information during the call.

Following assessment of the information provided by you, a contact tracer from the NI Contact Tracing Centre will call your contacts and provide advice on what they should do. If contacts are considered to be at risk of infection they will be advised to self-isolate for 14 days in line with government guidance (this will be explained during the telephone call).

Why are you processing my personal information?

The PHA is the data controller, for the personal data held by the PHA COVID 19 Contact Tracing Programme, under the Data Protection Act 2018, and uses your personal information for the following purposes:

- To contact you if you have tested positive for COVID 19, to provide public health advice if appropriate and to seek information on others that you have been in contact with;
- To contact you, if you have been in contact with someone who has tested positive, to give you appropriate public health advice to self-isolate and seek a test if you are symptomatic, in order to prevent further transmission of the virus;
- Sharing personal information with the responsible public health bodies in Wales/Scotland/England/Republic of Ireland (or other country where relevant) (if you live in that country, or visited it during the period you may have been infectious) to inform their local planning and public health responses to COVID 19;
- Public health surveillance – to identify and manage clusters of disease, identify trends in the COVID 19 disease outbreak and to prevent/control spread;
- Analysis – for reports and the production of official statistics (anonymised);
- Planning of services/actions in response to COVID 19 (anonymised);
- Research into coronavirus – including potentially being invited to be part of clinical trials.

Information provided by you, and collected about you, for the purposes of contact tracing for COVID 19 will not be used for any purpose that is not linked to COVID 19.

What information is collected?

We collect the following information on people who have tested positive for COVID 19 (*not all information fields will be relevant to, or collected, for all people who test positive*):

- Name
- Address
- Postcode
- Contact Number
- DOB
- HSC number
- Email
- Phone number
- Gender
- Occupation
- Health Care Worker
- GP
- Date of sample
- Date of result
- Result
- Date of onset

- Informed of result
- Symptomatic
- Date of Death
- Proxy Name¹
- Proxy telephone number
- Proxy relationship
- Place of work
- HSCNI role/job title

We collect the following information if you are the contact of a person who has tested positive:

- Name
- Phone Number
- Work address
- Contact address
- Date of contact
- Type of contact (2metres for 15 mins or more)
- Any places been eg shops
- Contact work in healthcare?
- Contact been unwell?
- Email address
- Proxy Name
- Proxy telephone number
- Proxy relationship
- Occupation
- Place of work
- HSCNI role/job title
- Symptoms

Please note that Contact Tracers will never:

- Disclose any of your personal or health/medical information to your contacts (although it may be possible for the person you have been in contact with to deduce your identity, from circumstantial information);
- Ask you to dial a premium rate number (for example, those starting 09 or 087) to speak to us;
- Ask you to make any form of payment or purchase a product of any kind;
- Ask for any details about your bank account;
- Ask for your social media identities or login details, or those of your contacts;
- Ask for any passwords or PINs, or ask you to set up any passwords or PINs over the phone;

¹ 'Proxy' is where someone else speaks on your behalf, for example a parent/guardian for a child under 13 years of age; where a person is unable to speak or understand English etc)

- Ask you to download any software to your PC or ask you to hand over control of your PC, smartphone or tablet to anyone else;
- Ask you to access any website or smartphone application that does not belong to the Government, NHS or HSC.

The lawful basis for processing your personal information according to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is:

GDPR Article 6(1)(e) - the processing is necessary for the performance of the Public Health Agency's official tasks carried out in the public interest (The official functions of the Public Health Agency are set out in the Health and Social Care (Reform) Act (Northern Ireland) 2009.)

Conditions for processing special category data (article 9 GDPR):

Article 9(2) (g) – the processing is necessary on the grounds of substantial public interest

Data Protection Act 2018 – Schedule 1, Part 2, 5 & 6(1) (2)

GDPR Article 9(2)(h) and (i) – the processing is necessary for the provision of health and social care and the management of health and social care systems (h) and for reasons of public interest in the area of public health (i)

Data Protection Act 2018 – Schedule 1, Part 1, (2)(2)(f) – Health or social care purposes (h) and Schedule 1, Part 1 (3) – reasons of public interest in the area of public health (i)

Do I need to give my consent?

The data is obtained on a lawful basis as outlined above and therefore you do not need to give consent.

Where do you get my personal data from?

If you have a positive test result: Much of the data we use will have been provided directly by you, when you booked your test (or someone booked it on your behalf).

The NI Contact Tracing Centre receives Test results directly from:

- The national COVID 19 testing initiative
- HSC Trust laboratories
- HSC Hospital Information Systems

You will also be asked to provide some additional information about yourself when you are contacted by the Contact Tracers.

Contacts: Your name and contact details will be provided by the person (above) who you have been in contact with. If you have travelled on a flight or a ship with someone who has tested positive your details will be provided by the relevant service provider.

You may also be asked to provide some additional information about yourself when you are contacted by the Contact Tracers.

Do you share my personal data with anyone else?

Yes. To help us provide the best service for you, we may need to share your information with other healthcare bodies and professionals, including GPs and hospitals, for the purposes of public health protection.

Sometimes, we may share some information with external organisations such as Department of Health NI, universities, auditors and research bodies. As far as possible, anonymised information collected for research purposes (eg to help identify trends in disease) will be used in a way that does not identify you personally. Non identifiable data may also be shared with Public Health England for the purposes of UK national disease surveillance.

Do you transfer my personal data to other countries?

Only in exceptional circumstances, for example, where information needs to be shared with Public Health agencies outside the UK (for example where you live or have visited another country, such as the Republic of Ireland) for the purposes of disease surveillance and to protect the health of individuals and others potentially affected by an outbreak.

Any transfers will be made in full compliance with GDPR and only when we have a legitimate and lawful basis for doing so, and it is proportionate and necessary to achieve these legitimate and lawful purposes.

How long do you keep my personal data?

We will only retain your data for as long as necessary, in line with our Retention and Disposal Schedule and specific guidance issued by the Department of Health in Northern Ireland (Good Management, Good Records). This means we will keep your personal information for a period of up to 8 years. *Please note, the retention period is currently under further consideration, and this Privacy Notice will be updated as soon as the timescale is confirmed.*

What rights do I have?

- You have the right to obtain confirmation that your data is being processed and access to your personal data;
- You are entitled to have personal data rectified if it is inaccurate or incomplete;
- You have a right to have personal data erased and to prevent processing, in specific circumstances;
- You have the right to 'block' or suppress processing of personal data, in specific circumstances;
- You have the right to data portability, in specific circumstances;
- You have the right to object to the processing, in specific circumstances;
- You have rights in relation to automated decision making and profiling.

How do I complain if I am not happy?

If you are unhappy with any aspect of this privacy notice, or with how your personal information is being processed, please contact the Data Protection Officer at the following address:

Public Health Agency Data Protection Officer:

Ms Rosemary Taylor

Public Health Agency, 12-22 Linenhall Street, Belfast, BT2 8BS

Tel: 028 9536 3519

Email: dpo.pha@hscni.net

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK0 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

<https://ico.org.uk/global/contact-us/>

Changes to this Privacy Notice

This Privacy Notice will be kept under regular review and any updates will be placed on our website.