

## NHS Test and Trace privacy notice

The information that you provide will be processed in accordance with the General Data Protection Regulation and Data Protection Act 2018. The data controller for this information is Kirklees Council who are registered as a 'Data Controller' with the Information Commissioner's Office, Registration Number Z575071X.

This privacy notice explains what personally identifiable data is collected by Kirklees Council. It also explains how this information is used, how it is protected, how long it is kept, who it is shared with, who shares it with us, what your rights are, and how you can find out more.

Read Public Health England's guidance on [how they are handling your information for Test and Trace](#).

### 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.

### Personal information we will require

Each individual entering buildings operated by Kirklees Council needs to 'check in' as they arrive. If you have downloaded the NHS COVID-19 app, you will be able to use the camera on your phone to scan the official NHS QR code which be on display, and which will be unique to each Council building. If you check into a venue, information about the venue you've been to will be stored on your phone as a record, which you can review at any time over a rolling 21-day period.

This will include details of the venue and the time of your visit. However, these details are only stored on your phone. For more information, see the [privacy notice for the NHS COVID-19 test and trace app](#).

If you don't have the facility to scan the QR code when you visit a Council building, you will be asked to provide your full name and your telephone number. If for any reason you can't provide a telephone number, you'll be asked for an email address, and if you don't have an email address, you'll be asked for your full postal address.

We will also need to record the date and time of your visit as well as, where possible, your departure time.

## **Why we need to process your personal data**

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that organisations take a range of measures to keep everyone safe.

The easing of social and economic lockdown measures following the COVID-19 outbreak is being supported by NHS Test and Trace. The Department of Health and Social Care has asked organisations including Kirklees Council to support this service by keeping a temporary record of our visitors for 21 days. In the event of a local outbreak of the virus this data may be used to assist NHS Test and Trace as needed. This could help contain clusters or outbreaks.

## **How we use your personal information**

In the event of a local outbreak of the coronavirus names and contact details of visitors to our sites may be provided to the NHS to support Test and Trace work.

NHS Test and Trace will ask for these records only where it is necessary, either because someone who has tested positive for COVID-19 has listed Council premises as a place they visited recently, or because our premises have been identified as the location of a potential local outbreak of COVID-19.

NHS Test and Trace will work with you, if contacted, to ensure that information is shared in a safe and secure way. You can find further information on how NHS Test and Trace works on the government website.

NHS Test and Trace will handle all data according to the highest ethical and security standards and ensure it is used only for the purposes of protecting public health, including minimising the transmission of COVID-19.

For more information about NHS Test and Trace, please see the [privacy notice from the Department of Health and Social Care](#).

## How long will we keep your personal information

Information which is collected and stored solely for NHS Test and Trace will be retained for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this information will be securely disposed of or deleted.

## How the law allows us to use your personal information

We collect your information under Article 6(1)(c) of the GDPR – legal obligation – because we are required by law to collect the contact details of visitors under The Health Protection (Coronavirus, Collection of Contact Details etc and Related Requirements) Regulations 2020. This is in order to support national track and trace work.

## Your data protection rights

Under data protection law, you have a number of rights, including the right to have your records rectified and the right to ask for access to all the information the Council holds about you. These rights are listed in more detail on [Kirklees Council's data protection rights page](#).

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 [Data.protection@kirklees.gov.uk](mailto:Data.protection@kirklees.gov.uk) if you wish to make a request.

## Where you can get advice

If you would like further information about how we manage your data, please see the [Kirklees Council privacy notice](#). You can also contact:

- The Data Protection Officer, Civic Centre 3, High Street, Huddersfield
- [DPO@Kirklees.gov.uk](mailto:DPO@Kirklees.gov.uk)

**You also have the right to complain to the regulator:**

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire DK9 5AF
- Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
- [ICO online enquiries](#)

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