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Contact Details:	Caerphilly County Borough Council – Corporate Information Governance Unit dataprotection@caerphilly.gov.uk
Privacy Notice Name:	COVID 19 – Service User COVID-19 confirmations and the collection / use of facility visitor / service user contact details for Test, Trace and Protect purposes.
Description of Privacy Notice:	<p>This Privacy Notice will explain how Caerphilly County Borough Council will use your personal data when entering our facilities or having face to face contact with a Caerphilly County Borough Council employee, agency worker, volunteer or elected member, in respect of:</p> <ul style="list-style-type: none">• COVID-19 confirmations (that currently you do not experience any COVID-19 symptoms and that you, your household or extended household have NOT been told to self-isolate and are not currently subject to Covid-19 quarantine after travel or illness).• Your contact details for NHS Wales Test, Trace and Protect purposes

How we will use your information

Purpose and legal basis for using your information

Purpose of processing

To ensure the safety of all, before you enter our facilities or face to face meetings with a Caerphilly County Borough Council (CCBC) employee, agency worker, volunteer or elected member at other locations, CCBC may request confirmation from you, that currently you do not experience any COVID-19 symptoms and that you, your household or extended household have NOT been told to self-isolate and are not currently subject to Covid-19 quarantine after travel or illness.

Access to our facilities / services may be refused, for the safety of others, if we request the above COVID-19 confirmations and you refuse.

In order to assist with the NHS Wales Test, Trace, Protect service, we may collect your contact details (or lead member in respect of groups) as a visitor to our facilities or as a service user with face to face contact with a CCBC employee, agency worker, volunteer or elected member specifically for this purpose, or we may use the contact details that you

have provided to us in the normal course of business (such as the booking of facilities or your case file) for this purpose. This data collection / use is carried out in line with Wales Government guidance.

Access to our facilities / services may be refused, for the safety of others, if we request your contact details for Test, Trace and Protect purposes and you refuse.

Your contact details may be requested by and shared with the NHS Wales Test, Trace, Protect service because you (or a member of your group, if you are a lead member) may have come into contact with an individual (including a CCBC employee, agency worker, volunteer or elected member) who has since received a positive SARS-CoV-2 test, while using our facilities or receiving a service from us.

The NHS Wales Test, Trace, Protect service will use your contact details to provide you with COVID 19 advice. Further information on who the NHS Wales Test, Trace, Protect service are and how they will use your information is available here:

www.caerphilly.gov.uk/CaerphillyDocs/FOI/PrivacyNotices/TTP_privacy_notice.aspx

Contact tracing is a long-established public health approach to containing the spread of many infections and has proven effective in controlling coronavirus in other countries. Further information on Test, Trace and Protect is available on the Wales Government website: gov.wales/test-trace-protect-coronavirus

Legal basis for processing

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

- Article 6(e) – The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vesting in the controller

Data Protection legislation provides extra protection for certain classes of information called 'special category personal data'. In respect of your confirmations in respect of COVID-19, this falls within the definition of special category personal data and so an additional condition from Article 9 of the Regulations must be identified in order to process this information, as outlined below:

- Article 9(i) – processing is necessary for reason of public interest in the protection of public health.

Other applicable articles may include:

- Article 9(g) – processing is necessary for reasons of substantial public interest
- Article 9(h) – processing is necessary for the purposes of preventive or occupational medicine, for the assessment of working capacity of the employee, medical diagnosis, the provision of health or social care treatment or the management of health or social care systems and services.

The processing of your data for contact tracing purposes is supported by:

- Public Health (Control of Disease) Act 1984
- The Health Service (Control of Patient Information) Regulations 2002
- Coronavirus Act 2020
- The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones
Corporate Information Governance Manager / Data Protection Officer
Email: dataprotection@caerphilly.gov.uk
Tel: 01443 864322

If your contact details are shared with the NHS Wales Test, Trace, Protect service, please see their Privacy Notice for further information on additional data controllers who may have access to your personal data, which is available here:

www.caerphilly.gov.uk/CaerphillyDocs/FOI/PrivacyNotices/TTP_privacy_notice.aspx

Details of main users of your information

The main user of your information will be Caerphilly County Borough Council, specifically the service area that are providing the facilities / services that you would like access to.

Details of any sharing of your information with other organisations

We do not envisage sharing your COVID-19 confirmations with other organisations.

Your contact details may be requested by and shared with the NHS Wales Test, Trace, Protect service because you (or a member of your group, if you are a lead member) may have come into contact with an individual (including a CCBC employee, agency worker, volunteer or elected member) who has since received a positive SARS-CoV-2 test, while using our facilities or receiving a service from us.

The NHS Wales Test, Trace, Protect service will use your contact details to provide you with COVID 19 advice. Further information on who the NHS Wales Test, Trace, Protect service are and how they will use your information is available here:

www.caerphilly.gov.uk/CaerphillyDocs/FOI/PrivacyNotices/TTP_privacy_notice.aspx

Requests for information

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information

Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

If we collect your COVID-19 confirmations verbally on entry to our facilities, this information will not be retained. If your COVID-19 confirmations were collected as part of an on-line booking of facilities, your COVID-19 confirmation will be kept as part of the booking information which is usually retained for up to 7 years. If your COVID-19 confirmations were collected during a telephone conversation, then in most instances this will not be retained unless the call is being recorded which you will be notified of. Retention of call records vary by service.

Your contact details if not solely collected for Test, Trace and Protect purposes, will be kept in line with the usual retention period. For example, in relation to the booking of facilities where there is a fee, this is usually 7 years. Your contact details, if solely collected for Test, Trace and Protect purposes, will be kept for 21 days.

If it becomes necessary to share this information with the NHS Wales Test, Trace, Protect service, they may keep your contact details in line with their own retention periods.

Your Rights (Inc Complaints Procedure)

Your rights under the Data Protection

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.

To enact your rights please contact the service area detailed on the top of this form.

Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints

Summary Privacy Notice

How we will use your information

To ensure the safety of all, before your entry to our facilities or face to face meetings with a Caerphilly County Borough Council (CCBC) employee, agency worker, volunteer or elected member at other locations, CCBC may request confirmation from you that currently you do not experience any COVID-19 symptoms and that you, your household or extended household have NOT been told to self-isolate and are not currently subject to Covid-19 quarantine after travel or illness.

The legal basis for processing this data is public task, and in most instances will not be retained unless collected during a telephone conversation that we have informed you is being recorded, or the information is collected as part of your on-line booking of facilities system.

In order to assist with NHS Wales Test, Trace, Protect service, we may collect and share your contact details as a visitor to our facilities (or lead member in respect of groups) or as a service user, specifically for this purpose or we may use the contact details that you have provided to us in the normal course of business, such as the booking of facilities or your case file, for this purpose. This data collection / use is carried out in line with Wales Government guidance.

The legal basis for processing this data is public task and your contact details may be shared with the NHS Wales Test, Trace, Protect service, if requested because you (or a member of your party in respect of group bookings) has come into contact with an individual who has since received a positive SARS-CoV-2 test. Your contact details, if not solely collected for Test, Trace and Protect purposes, will be kept in line with the usual retention period. Your contact details if solely collected for Test, Trace and Protect purposes will be kept for 21 days.

Access to our facilities / services may be refused, for the safety of others, if we request COVID-10 confirmation, and/or your contact details for Test, Trace and Protect purposes and you refuse.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link:

[{Hyperlink to Full Privacy Notice on our website}](#)