

PRIVACY NOTICE

Test and Trace Self-Isolation Support Payment Application



Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679).

The information being processed

The Council will collect details from you including;

- full name
- date of birth
- residential address
- email address
- home and mobile telephone numbers
- employer name and address
- National Insurance number
- NHS notification number (given by NHS Test and Trace Service)
- employment and benefit information
- bank account details
- proof of self-employment for example,
 - business bank statement (within the last two months)
 - your most recent set of accounts
 - evidence of self-assessment
- Details of any person applying on your behalf

Why are we collecting it?

This information will be collected during the application process to check the eligibility of, and issue payments to, residents who have applied for a Test and Trace Support Payment or a Discretionary Test and Trace Support Payment.

Information Sharing

We only ever share your information if we are satisfied that our partners have sufficient measures in place to protect your information in the same way that we do. We will never share your information for marketing purposes.

The Council will receive information from the NHS Test and Trace Service to confirm that you have either tested positive for COVID-19 or you have been in close contact with someone who has tested positive for COVID-19. As this data is related to your health it is classed as 'special category' data.

The Council will carry out checks with the Department for Work and Pensions (DWP), for verification purposes and Her Majesty's Revenue and Customs (HMRC), for tax and National Insurance purposes, and potentially with your employer when validating your application.

Information relating to your application will also be sent to the DHSC to help understand public health implications, to allow us to carry out anti-fraud checks and to determine how well the scheme is performing

We will not share this data with other organisations or individuals outside of Plymouth City Council for any other purpose.

Our lawful basis for processing your personal data

We must have a lawful basis to process your personal data.

Our lawful basis to process the information you provide for your assessment for a self-isolation payment, and in making that payment to you is:

- GDPR Article 6(1)(c) processing is necessary for compliance with a legal obligation to which the controller is subject

Where we use personal information to confirm that someone is eligible for a self-isolation payment, the section of the law that applies is:

- 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

Processing Special Categories of Personal Data or Criminal Offence Data

The Council will only process special categories of data (also known as sensitive data) about you where we are legally obliged to do so or are authorised to do so in law.

We will obtain data from the NHS Test and Trace Service to confirm that you have either tested positive for COVID-19 or you have been in close contact with someone who has tested positive for COVID-19 and process this data, relating to your health, to confirm that you are eligible for a self-isolation payment. The information, relating to your health, may also be shared with the DHSC for the purposes described in the information sharing section above. The sections of the law that apply are:

- 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
- GDPR Article 9(2)(i) - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare;
- Data Protection Act 2018 Schedule 1 Part 1 (2) - health or social care purposes

Retention Periods

We will only keep your personal data for as long as it is needed for the purposes of the COVID-19 emergency, and for audit and payment purposes.

How we will process your data

As a local authority, the council delivers services to you. In order to do this in an effective way we will need to collect and use personal information about you.

The Data Protection Act 2018 and the EU General Data Protection Regulation ensure that we comply with a series of data protection principles. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner.
- Collect personal information for a specified, explicit and legitimate purpose.
- Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected.
- Ensure the personal information is accurate and up to date.
- Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected.
- Keep your personal information securely using appropriate technical or organisational measures.

Your Rights

You have certain rights under the Data Protection Act 2018 and the EU General Data Protection Regulations (GDPR), these are:

- The right to be informed via privacy notices such as this.
- The right of access to any personal information the council holds about you.
- The right of rectification. We must correct inaccurate or incomplete data within one month.
- The right to erasure. You have the right to have your personal data erased and to prevent processing unless we have a legal obligation to process your personal information or are processing it on the basis of a public task.
- The right to restrict processing. You have the right to suppress processing. We can retain just enough information about you to ensure that the restriction is respected in future.
- The right to data portability. We can provide you with your personal data in a structured, commonly used, machine readable form unless we have a legal obligation to process this information or are processing it on the basis of a public task.
- The right to object. You can object to your personal data being used for profiling, direct marketing or research purposes. You cannot object where we are processing your information on the basis of a legal obligation.
- You have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

Details of transfers to third country and safeguards

Your personal and sensitive data will only be stored and processed on servers based within the United Kingdom.

Data Controller

Plymouth City Council is registered as a data controller with the Information Commissioner's Office (registration number: Z7262171).

For any concerns or enquiries the contact details for the Council's data controller are:

Data Protection Officer, Plymouth City Council, Ballard House, West Hoe Road, Plymouth PL1 3BJ.
Email: dataprotectionofficer@plymouth.gov.uk

Information Commissioners Office

If you remain dissatisfied with the way we have handled or shared your personal data you have the right to raise a complaint with the Information Commissioner's Office. They can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 0303 123 1113 <https://ico.org.uk/make-a-complaint/>