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| **Covid-19 Track & Trace Privacy Notice**  **for**  Children and Families Group |

**Introduction**

The children and Families Group takes current government guidance seriously and aims to protect and process your personal data in a safe and secure manner.

To support NHS Test and Trace in England, some organisations in certain sectors of the economy must collect the details, and maintain records, of staff, customers and visitors on their premises.

This privacy notice is concerned with the processing of this personal data by the Department of Health and Social Care (DHSC) from the point of when it needs to be shared by the Children and Families Group.

The purpose of DHSC’s processing will be to facilitate NHS Test and Trace in conducting contact tracing. This may be necessary in the event that an individual, who is present, tests positive for coronavirus. NHS Test and Trace may then contact you to provide appropriate advice.

NHS Test and Trace is a key part of the country’s ongoing COVID-19 response and is run by DHSC. It includes dedicated contact-tracing staff working at national level under the supervision of Public Health England (PHE) and local public health experts who manage more complex cases. Local public health experts include both PHE health protection teams and local authority public health staff.

The Children and Families Group will maintain records of staff, customers and visitors (and sharing these with NHS Test and Trace where requested), as this can help to identify people who may have been exposed to the virus.

The more rapidly and accurately DHSC can identify people who may have been exposed to the virus and, if necessary, ask them to self-isolate, the more effectively we can break the chains of COVID-19 transmission.

**Children and Families - Data Controller**

**Data controller: Jim Duncan, CEO, Children and Families Ltd. Seashells, Rose Street, Sheerness, Kent, Me12 1AW. Tel: 01795 889233 email:** [**JimDuncan@children-families.org**](mailto:JimDuncan@children-families.org)

It is your responsibility to ensure the correct personal details are given to ensure we can support the delivery of an effective Test & Trace system. We will act and share your data with government official sources as and when required to do so. We will store and process the information you have shared with us in compliance with data protection legislation and GDPR guidance’s.

The legal basis for collecting this information is covered by GDPR Article 6(1)(c): a legal obligation to which the venue/establishment are subject.

DHSC will become the data controller for the data at the point that it receives the data from an organisation with the Children and Families Group. It will be at this point DHSC will begin to start the contact-tracing activities.

**What personal data do we collect and how do we collect it?**

You may be asked to provide some basic information and contact details.

* Name
* A contact details
* The dates and times of your visit
* The name of any person you visit whilst at our premises

DHSC will only request these records where it is necessary for running an effective NHS Test and Trace service. It might be necessary (for this purpose) either because:

* someone who has tested positive for COVID-19 has listed a specific setting/organisation as a place they visited recently
* a setting/organisation has been identified as a potential location of a local outbreak of COVID-19

Under these circumstances DHSC, through NHS Test and Trace, will contact the setting within the Children and Families Group by phone or text and request that it shares specific information (that is, the contact details of individuals who were on the premises between specific times on a specific day). NHS Test and Trace will then conduct a contact-tracing exercise with a view to providing those individuals with appropriate advice.

The setting within the Children and Families Group will then disclose your information to DHSC.

We will collect your information when signing into one our settings. This can be done either using our visitor’s books or using a QR reader in certain settings. We will require you to provide us with your full name, contact number, email, visiting details, time in and out.

**The purpose that DHSC will use your data**

DHSC is the data controller for the purpose of contact tracing, through PHE and local public health experts, having received the data from the venues/establishments.

**Data Retention**

Your data that is collected by the Children and Families Group for NHS Test and Trace will be retained locally for 21 days after your visit, at which point it will be deleted or destroyed, unless the Children and Families Group usually collects the data for other legitimate business purposes in accordance with the GDPR.

Where your data is passed to NHS Test and Trace in the case of a suspected outbreak, your information will be kept for up to 8 years, as part of the standard contact-tracing retention period set out by PHE.

**Data Storage**

Information collected as part of this contact-tracing initiative will be stored securely and lawfully by the Children and Families, and by NHS Test and Trace (if passed to them), in line with the requirements of the GDPR and Data Protection Act 2018.

**Legal Basis under GDPR and DPA 2018**

DHSC’s legal basis for processing your personal data is:

* GDPR Article 6(1)(e): the processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a health service
* GDPR Article 9(2)(h): the processing is necessary for the management of health or social care systems and services
* GDPR Article 9(2)(i): the processing is necessary for reasons of public interest in the area of public health
* DPA 2018 – Schedule 1, Part 1, s.3: Public Health
* DPA 2018 – Schedule 1, Part 1, (2)(2)(f): Health or social care purposes

**Your Rights As A Data Subject**

As a data subject, you have a number of rights. You can:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

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.

If you would like to exercise any of these rights, please contact Jim Duncan, [jimduncan@children-families.org](mailto:jimduncan@children-families.org)

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

If you’re unhappy or wish to complain about how your personal data is used as part of this programme, you should contact DHSC in the first instance to resolve your issue. DHSC may have to work with partner organisations to resolve your complaint.

If this is unsuccessful, you can also raise a complaint with the [Information Commissioner’s Office](https://ico.org.uk/).

DHSC’s data protection officer is Ian Stone, and he can be contacted by sending an email to [data\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk).

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

If you would like to discuss anything in this privacy notice, please contact:

Jim Duncan CEO (JimDuncan@children-families.org)

Children and Families Group

Seashells, Rose Street, Sheerness, Kent, ME12 1AW

Tel: 01795 889233