

FOR FURTHER INFORMATION IN RELATION TO HOW THE COUNCIL CAN HELP YOU DURING THIS TIME

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Merthyr Tydfil County Borough Council
PRIVACY NOTICE

COVID-19 EMERGENCY RESPONSE REGIONAL CONTACT TRACING PRIVACY NOTICE

This notice has been written in accordance with the General Data Protection Regulation and relevant legislation.

Information Governance Team

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Date Created: 1st September 2020
Responsible Department: Contact Tracing Service
Responsible Manager: Ellis Cooper

This privacy notice has been updated to reflect Welsh Government changes with regards to Contact Tracing, with effect from 09/02/2023

How we use your personal information for Contact Tracing purposes within the Cwm Taf Morgannwg area.

We have summarised in this privacy notice some of the key ways in which Bridgend County Borough Council, Merthyr Tydfil County Borough Council, Rhondda Cynon Taf County Borough Council and Cwm Taf Morgannwg University Health Board (collectively referred to as 'we or us' in this notice) use your personal information for Contact Tracing purposes within the Cwm Taf Morgannwg area.

This information should be read in conjunction with the National Contact Tracing Privacy Notice for Wales.

We will always follow advice and guidance from the Welsh Government and Public Health Wales and any changes to the way in which we provide you with that support with regards to Test, Trace, Protect will be updated within this privacy notice.

1. What is Contact Tracing and how does it work?

As lockdown restrictions are relaxed we all need to continue to take steps to protect ourselves, families and the community. Contact tracing continues to play an important role in helping us resume day-to-day activities in the on-going fight against COVID-19 (Corona virus) and helping to find a way for people in Wales to live and work alongside the virus whilst containing its spread.

Contact tracing is a known method of controlling the spread of an infectious disease. As soon you start to display symptoms you should self isolate and take a lateral flow test on day 5 and 6, if both of these tests are negative you can leave self isolation.

2. Who provides Contact Tracing?

In order to respond to the COVID-19 endemic, Contact Tracing is being undertaken across Wales, delivered by a number of key government agencies and organisations. Within Wales these are Welsh Government, Public Health Wales NHS Trust, the 7 Local Health Boards, 22 Local Authorities, Velindre Hospital NHS Trust, Digital Health and Care Wales (DHCW) and the Welsh Ambulance Service are working together to provide Contact Tracing.

Depending on where you live and the contact you have through the Contact Tracing Service, your data may be processed by any of the organisations listed above.

The following outlines what each organisation does in relation to Contact Tracing specifically in the Cwm Taf Morgannwg area.

Regional Contact Tracing Teams

For the Cwm Taf Morgannwg area; Bridgend County Borough Council, Merthyr Tydfil County Borough Council and Rhondda Cynon Taf County Borough Council are working together to deliver Contact Tracing for people who live within these counties.

The regional Contact Tracing Team will contact individuals who have received a positive test to discuss their symptoms and establish who they have been in contact with (referred to as 'contacts') and when.

You will receive an eform form to complete and will be given the option of updating your details Yourself. However, if you do not complete the form the Contact Tracing Team will make contact with you to gather details.

The team will also make contact with the contacts and they will receive digital communications with advice and links on what to do next.

All calls made by the Contact Tracing teams are recorded for monitoring/training purposes and to assist with resolving any complaints that maybe received.

NHS – Cwm Taf Morgannwg University Health Board

For residents who have been in hospital for more than 3 days, you will be classed as a 'hospital acquired Covid case' and the Local University Health Board will undertake Contact Tracing on behalf of the Local Authority.

Your details will be passed to the hospital's Infection Prevention and Control Team (IP&C) who will contact/meet with you to undertake the contact tracing questions.

This will be the same process for someone who has been discharged from hospital, but soon after discharge, tests positive for Covid, the IP&C Team will contact you to discuss your symptoms and who you have been in contact with.

Digital Health and Care Wales (DHCW)

DHCW are providing the digital system in which all information captured by the Regional Contact Tracing teams are securely stored.

Public Health Wales (PHW)

Public Health Wales are providing specialist support, advice and leadership at a national level to NHS Wales, Local Health Boards and Local Authorities in relation to COVID.

In addition, PHW also provide and co-ordinate Contact Tracing for cross boarder cases, for example where an individual has travelled to and from different counties or countries both inside and outside the UK. This is explained further in this notice.

- **What and whose personal information we hold?**

The Contact Tracing Team will hold the following information about the following people:

Individual who has tested positive for COVID-19:

- Full name
- Full address and contact information such as your telephone number and email.
- Date of birth
- Sex
- NHS number
- Details on COVID-19 test information such as test date, result date, result (positive)
- Details on COVID-19 symptoms
- Information about whether you are in a care home or hospital.
- Disability and ethnicity data
- Details of your household and living arrangements.
- Information about the people you have been in contact with, this may include household members, family, friends and colleagues etc.
- Information about the places you have visited.
- If you have been in contact with colleagues we may also need information about your place of work and employment.
- Any other information that may be relevant to contact tracing that you may wish to share with us.
- A record of any advice and information we have given you.
- Details of any COVID-19 vaccinations you have received.

Individual who has been in contact with a person who has tested positive for COVID-19:

- Full name
- Full address and contact information such as your telephone number and email.
- DOB
- Details on any COVID-19 symptoms you may be experiencing.
- Disability and ethnicity data.
- A record of any advice and information we have given you.
- Any other information that may be relevant to contact tracing that you may wish to share with us.
- Details of any COVID-19 vaccinations you have received.

4. Where does the service get my information from?

Individual who has tested positive for COVID-19:

If you have tested positive for COVID-19 your information will be passed to the Contact Tracing Team by the NHS. The Contact Tracing Team will also gather more information directly from you when they speak to you/you complete an eform and you agree to answer questions from the Contact Tracer.

Individual who has been in contact with a person who has tested positive for COVID-19:

If you are identified as being in contact with someone who has tested positive for COVID-19, your name and contact details will have been provided to us by the individual who has tested positive (please note for confidentiality reasons we will not be able to tell you who that person was).

Depending on who has tested positive, where they live and the places/areas they have visited, your information may also be provided to use by other organisations involved in contact tracing both inside and outside of Wales – such as other local authority Contact Tracing teams

Schools and Council managed childcare settings

There is a legal requirement for Contact Tracing Teams to work closely with education settings such as Council managed nurseries and Schools in relation to public safety. This is to ensure that any child who has tested positive for any infectious disease and anyone they have been in contact with, are kept away from school/nursery if required to do so.

In order to ensure this, a child's test result will be shared by the Contact Tracing Team with the relevant Head teacher or the Councils Flying Start Childcare Manager if they attend a Council run nursery. Likewise, the Head teacher and the Flying Start Childcare Manager will share test information with the Contact Tracing Team if they become aware of a child who is positive or is undergoing a test.

Permission to act on your behalf:

If you are aged 16 and over you can give permission for us to speak to someone else on our behalf if you prefer.

If you are under the age of 16 we will speak to your parents/guardians about your symptoms.

5. What will we do with your personal information?

Individual who has tested positive for COVID-19:

If we have been notified that you have tested positive, a Contact Tracer will contact you to provide advice and support. They will ask about your symptoms and try to establish who you have been in contact with.

It may be necessary for us to refer your case to other departments in the Council, for example Social Services if we have any safeguarding concerns about your welfare or others within your home. Officers have a legal duty to this and if you would like to know more about why and how we will do this please take a look at our Community & Children Services privacy notice.

Individual who has been in contact with a person who has tested positive for COVID-19:

If you have been in contact with someone who has tested positive, you will either receive digital communications on what to do next or a Contact Advisor will make contact with you and if you agree to answer the questions they will provide you with advice on what to do next.

If you do not engage with the team and do not want to answer any questions, we are required to send you a letter explaining what action you need to take.

Duty to self-isolate

It has always been your responsibility to follow the advice of the Contact Tracing Team.

It is no longer a legal requirement to isolate but Welsh Government are recommend that if you feel unwell, you should self isolate.

Research & Reporting

Analysis of the above information may also be used by us, the NHS, Public Health, Welsh Government, Central Government to produce reports that will;

- Understanding COVID-19 and risks to public health, trends in COVID-19 and such risks, and controlling and preventing the spread of COVID-19 and such risks
- Identifying and understanding information about patients or potential patients with or at risk of COVID-19
- Delivering services to patients, clinicians, the health services to our citizens.
- Research and planning in relation to COVID-19 (including potentially being invited to be part of clinical trials)
- Monitoring the progress and development of COVID-19.
- To respond to public inquiries (an official review of events or actions ordered by a government body).

6. What is the legal basis for the use of this information?

The legal basis for processing your personal data for contract tracing purposes under the General Data Protection Regulation (GDPR) is:

- Article 6(1)(e) – Task carried out in the public interest or in the exercise of official authority vested in the controller

For more sensitive data such as health information (known as special category data) an additional legal basis is required and is:

- Article 9(2)(h) - Provision of preventative or occupational medicine, health or social care or treatment, or the management of health or social care systems
- Article 9(2)(i) - Processing must be 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 health care and of medicinal products or medical devices)

This is supported by the following legislation:

- Public Health (Control of Diseases) Act 1984
- The Health Protection (Wales) Regulations 2010
- The Health Protection (Notifications)(Wales) Regulations 2010
- The Health Protection (Local Authority Powers) (Wales) Regulations 2010
- The Coronavirus Act 2020
- The Health Protection (Coronavirus Restrictions)(Wales) Regulations 2020
- Inquiries Act 2005

These pieces of legislation allow the Council to discharge certain duties in terms of protecting the public from a communicable disease which includes; preventing, protecting against or controlling the risk to the public. This includes allowing the Council to use information we may already hold on you, to identify you as a contact and to share your information with other agencies.

7. Does the service share my personal information with any other organisation?

As described throughout this privacy notice, the Contact Tracing Team may share your personal information with other organisations and agencies involved in the delivery of COVID-19 Contact Tracing. The requirement to share this information will depend who has tested positive, the people they have been in contact with and the places they have visited.

Organisations and agencies may include, but are not limited to;

- Local Authorities
- Internal Council Departments
- Local Health Boards
- NHS Trusts
- Public Health agencies

8. How long will my information be kept?

We will only keep your personal data for as long as is necessary and for the purpose for which we are processing it.

For an individual who has tested positive for COVID-19 this will be for 7 years.

For an individual who has been in contact with someone who has tested positive, but does not have any symptoms themselves, we will keep your records for 5 years.

9. Your information, your rights

The General Data Protection Regulation (GDPR) gives you important rights, including the right to access the personal information the services hold about you.

Click [here](#) for further information on your information rights and how to exercise them.

10. Contact us

If you have any concerns or would like to know more about how your personal information is being used for Contact Tracing purposes please contact us at:

Rhondda Cynon Taf Borough Council

Public Health Team

Ty Elai,

Dinas Isaf East,

Williamstown,

Tonypandy,

RCT

CF40 1NY

By email : ContactTracingServiceRCT@rctcbc.gov.uk