



## Privacy Notice Cumbria COVID-19 Local Contact Tracing System

When processing your personal data, the council is required under Articles 13 and 14 of the UK General Data Protection Regulation (UKGDPR) to provide you with the information contained in this document.

### Data Controller

<b>Name</b>	Cumbria County Council
<b>Address</b>	Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
<b>Registration Number</b>	Z5623112

You can search the Information Commissioner's Register of Fee Payers at:  
<https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

### Data Protection Officer

The council's Data Protection Officer is Claire Owen. You can contact the Data Protection Officer by:

Email: [dataprotection@cumbria.gov.uk](mailto:dataprotection@cumbria.gov.uk)  
Post: Cumbria County Council, Legal and Democratic Services, 1<sup>st</sup> Floor, Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD  
Online: [Contact Form](#)

### Purpose

Cumbria COVID-19 Local Contact Tracing System has been established to:

- comply with the aims of Cumbria Testing and Contact-Tracing Strategy, and
- complement the national COVID-19 Test, Track and Trace system.

Effective data sharing is crucial to supporting the needs of the community and the work of:

- Cumbria COVID-19 Call Centre (Central Point of Access)
- Cumbria Incident Management Hub
- Local Contact-Tracing Hub (Cumbria Sexual Health Services)
- Outbreak Control Team
- Local Contact-Tracing Intelligence Cell

These groups will co-ordinate a range of activities including:

- Individual Contact-Tracing: case-identification, contact-finding, follow-up isolation advice and testing for high-risk contacts, and
- Incident Management: local identification of potential clusters/outbreaks, response to national incident referrals

Local contact-tracing will be launched in a number of phases, allowing for changes in process as the national contact-tracing system comes online and scales up its activity.

The overall aims of contact-tracing will be to:

- Reduce the spread of COVID-19 in Cumbria through prompt identification of close contacts of individuals with COVID-19, risk assessment of those contacts, and provision of advice on self-isolation and testing.
- Provide appropriate self-isolation, self-monitoring, and infection-prevention advice to contacts of individuals with COVID-19.
- Conduct contact-tracing activities relating to potential clusters and outbreaks of COVID-19 in schools, large employers, and community settings.
- Complement, not replace the national test and trace system.
- Inform the response of Cumbria outbreak control teams through timely data-sharing and follow-up.

## Data Collection

Data will be collected initially by referrals made to Cumbria COVID-19 Call Centre and then, depending on an assessment of COVID-19 status referred to the Local Contact-Tracing Hub.

Data may also be collected from the COVID-19 National Contact Tracing System in relation to complex incidents and outbreaks.

## Data Types

The following data is required by the Local Contact Tracing System to meet legal obligations and to enable officers to reach informed and robust recommendations and decisions:

- name
- date of birth
- postal address including postcode
- email address
- mobile or landline telephone number

Depending on COVID-19 status we may also collect, store and use the following 'special categories' of more sensitive personal information:

- gender
- COVID-19 status i.e. self-isolating, shielding
- health i.e. symptoms
- social/sexual or religious activity
- employment status i.e. key worker status, work location, employer name

## Legal Basis for Processing Data

The Local Contact Tracing System relies on the processing of your personal data (such as name, age, address), and to do this we rely on the following legal bases:

- **UKGDPR Article 6(1) (a) Consent**
- **UKGDPR Article 6(1) (c) Legal Obligation**
- **UKGDPR Article 6(1) (d) Vital Interests**
- **UKGDPR Article 6(1) (e) Public Task/Public Interest/Official Authority**

Where the council is relying on UKGDPR Article 6(1)(c) all [Relevant Legislation](#) is listed below.

Depending on COVID-19 status the System also relies on the processing of more sensitive 'special categories of personal data' (such as health, race, ethnicity, sexual orientation) and to do this we rely on the following legal bases:

- **UKGDPR Article 9(2) (i) Public health**

The Local Contact-Tracing Intelligence Cell will access data specifically to analyse outbreak trends and rely on the following legal basis:

- **UKGDPR Article 9(2) (j) Archiving, scientific/historical research or statistical purposes**

## Relevant Legislation

These legal bases above are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities, including:

- [Regulation 3\(4\) Health Service \(Control of Patient Information\) Regulations 2002](#)

## Automated Decision-Making/Profiling

We do not use your information for automated decision-making or profiling purposes.

## Data Transfers

Your personal data is not transferred to a third country or international organisation.

## Redaction

We operate a policy where we routinely redact the following details before making forms and documents available online:

- contact details e.g. telephone numbers, email addresses
- signatures
- personal or special category data
- information agreed to be confidential or commercially sensitive

Occasionally it may be considered necessary, justified and lawful to disclose data that appears in the list above. In these circumstances the council will make all reasonable efforts to contact you if this processing is going to have an impact on your rights or privacy.

## Data Sharing

We may share your information with the following organisations depending on your COVID-19 status:

- Public Health England
- Environmental Health (District/Borough Councils)
- NHS
- Schools
- Employers

During the course of the COVID-19 emergency your data may need to be shared with other public bodies or organisations. All reasonable efforts will be made to contact you if this processing is going to have an impact on rights or privacy.

## Data Security and Retention

All of the information you give us will be kept safe and secure whether it is written or on a computer system. We will treat any personal information confidentially and will comply with the UKGDPR/Data Protection Act 2018. This means that, if we keep any of your personal data we must:

- tell you what information we need to collect from you
- only use the information for the reason we have agreed with you
- not ask for more information than we need to provide the services
- let you see any information we have collected about you, on request
- keep the information safe, secure and confidential
- personal information will be deleted in accordance with council policy

The information you supply will be kept on a secure council system and can only be accessed by authorised employees.

Cumbria County Council will only store your information for as long as is legally required in accordance with the council's Retention and Disposal Schedule or in situations where there is no legal retention period established best practice will be followed.

## Your Rights - Data Subject Access

The UKGDPR provides you with the right to access information the council, as a public authority holds about you. Upon receipt of a valid request the council will:

- provide you with a response within one month
- let you know if your request is subject to an extension
- make reasonable efforts to comply with the format of your request
- inform you if your request is going to be refused or a charge is payable.

You can make a Data Subject Access Request by contacting:

Email: [information.governance@cumbria.gov.uk](mailto:information.governance@cumbria.gov.uk)  
Post: Cumbria County Council, Information Governance Team  
Parkhouse, Baron Way, Carlisle CA6 4SJ  
Telephone: (01228) 221234  
Online: [Contact Form](#)

## Your Rights - Other

In addition to your right of access the UKGDPR also gives you the following rights:

- the right to be informed via the council's Privacy Notice
- the right to withdraw your consent. If we are relying on your consent to process your data then you can remove this at any point
- 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
- 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 when asked
- the right to object. You can object to your personal data being used for profiling, direct marketing or research purposes
- 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.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another

lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Unless otherwise stated above you can exercise any of these rights by contacting:

Email: [dataprotection@cumbria.gov.uk](mailto:dataprotection@cumbria.gov.uk)  
Post: Cumbria County Council, Legal and Democratic Services, 1<sup>st</sup> Floor, Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD  
Online: [Contact Form](#)

## Verifying Your Identity

When exercising the rights mentioned above please be aware that under UKGDPR Article 12(6) additional information can be requested to verify that you are the data subject if your identity is unconfirmed. Please note that:

- additional documentation is only required when the council cannot verify your identity using internal council systems that relate to the service you are requesting information about
- the council will contact you for this documentation prior to processing your request
- the statutory deadline for responding to your request will start when you have provided the additional documentation
- failure to provide additional documentation may lead to the council rejecting your request.

## Complaints

If you have any concerns about the information contained in this Privacy Notice please contact: [IPC@cumbria.gov.uk](mailto:IPC@cumbria.gov.uk).

If you have concerns about the way the council has processed your data, please contact the council's Data Protection Officer via:

Email: [dataprotection@cumbria.gov.uk](mailto:dataprotection@cumbria.gov.uk)  
Post: Cumbria County Council, Legal and Democratic Services, 1<sup>st</sup> Floor, Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD  
Online: [Contact Form](#)

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>