

## **Self-Isolation Payment Privacy Notice – October 2020**

On 28<sup>th</sup> September 2020, the Government passed into law a national Test and Trace Support scheme. From 12<sup>th</sup> October, a one-off payment of £500 or access to a discretionary fund will be available for eligible individuals. More information about this scheme can be found here: <https://www.gov.uk/government/news/new-payment-for-people-self-isolating-in-highest-risk-areas>

If you apply, we will need to process your personal data to assess whether you are eligible to receive financial support, and if so, to provide a payment to you. This Privacy Notice sets out what personal data we will use, how we will use it, and why we need to, when an applicant applies for this support.

### **Data Controller**

The Department of Health and Social Care (DHSC) has commissioned NHS Test and Trace on behalf of the government and is the data controller for the purposes of providing Test and Trace data to City of Wolverhampton Council.

The City of Wolverhampton Council is the data controller for the purposes of assessing eligibility, administering and making payments under the Test and Trace Support scheme.

### **New package to support self-isolation**

If you have been told by the NHS to self-isolate, either because you have tested positive for COVID-19 or you have been in contact with someone who has tested positive, you may be entitled to some financial support during your self-isolation period.

### **What are Self-Isolation Payments?**

People who are eligible will receive:

A £500 one-off Test and Trace Support payment or provision from the discretionary fund to remain at home to help stop the spread of the virus.

### **Categories of personal data we collect and process**

We collect and process the personal data that you provide to us when completing your application for a self-isolation support payment, which will include a combination of:

- Full name;
- Full residential address;
- Email address;
- Mobile telephone number;
- Home telephone number;
- Proxy applicant details (as above where you may nominate someone else to complete this application on your behalf);
- Employer name and address;

- NHS notification number (the unique reference you will be given by NHS Test and Trace Service to self-isolate);
- Bank account details;
- Your National Insurance Number;
- Proof of self-employment e.g. recent business bank statement (within the last two months), most recent set of accounts or evidence of self-assessment

### **Source and categories of personal data**

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. As this data is related to your health it is referred to as 'special category data'.

You or your nominated representative will also provide us with a combination of additional personal data in relation to your application for a Self-Isolation Payment as detailed above.

### **What we use your personal data for**

We will carry out checks with the NHS Test and Trace Service and the Department for Work and Pensions (DWP), for verification purposes, Her Majesty's Revenue and Customs (HMRC), for tax and National Insurance purposes, and potentially with your employer in validating your application.

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

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

We will provide information to HMRC in relation to any payments we make because Self-Isolation Payments are subject to tax and National Insurance contributions. If you are self-employed, you will need to declare the payment on your self-assessment tax return.

### **Our lawful basis for processing the personal data**

Our lawful basis in the processing that we will undertake in assessing your eligibility for, and in making any self-isolation payment to you, is based on a legal obligation [The Health Protection (Coronavirus, Restrictions) (Self-Isolation) (England) Regulations 2020].

Where we use personal information to confirm that someone is eligible for a self-isolation payment, 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

Separately, we have special permission from the Secretary of State for Health and Social Care to use confidential patient information without people's consent for the purposes of diagnosing, recognising trends, controlling and preventing, and monitoring and managing communicable diseases and other risks to public health.

This is known as a 'section 251' approval (section 251 of the National Health Service Act 2006 and Regulation 3 of the associated Health Service (Control of Patient Information) Regulations 2002) and includes, for example, using your test results if you test positive for COVID-19 to start the contact-tracing process.

You can find more information on this via the NHS Contact Tracing Privacy Notice here: <https://contact-tracing.phe.gov.uk/help/privacy-notice>

### **Data Processors and other recipients of your data**

These are the recipients with which your personal data is shared:

- Her Majesty's Revenue and Customs (HMRC) for tax and National insurance purposes;
- Your employer for verification checks purposes;
- Police;
- Department of Health and Social Care, and all arm's length bodies of the Department;
- Other local authorities where appropriate;
- Other local organisations where appropriate;

Your personal data may also be shared with regulatory and statutory bodies who access council performance and financial spend, as well as where required by law, such as to prevent and detect crime and fraudulent activity.

### **International Data Transfers and Storage**

The City of Wolverhampton Council will not transfer your personal data outside of the UK, EEA or to third countries. Your data will be placed on an appropriate system and access to this system, for Council staff will be based on a need to know basis.

### **Personal data disposal and retention**

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.

### **Cookies**

Cookies are small text files that are placed on your browser. To see how we use cookies, please follow this link: <https://www.wolverhampton.gov.uk/your-council/our-website/privacy-and-cookies-notice>

## Your rights as a data subject

By law, you have a number of rights as a data subject and this does not take away or reduce these rights. Your rights under the EU General Data Protection Regulation (2016/679) and the UK Data Protection Act 2018 applies.

All information is processed in accordance with the City of Wolverhampton Council's data protection policy that can be found here:

<https://www.wolverhampton.gov.uk/sites/default/files/2020-02/Data-Protection-Policy.pdf>

These rights are:

1. **Your right to get copies of your information** – you have the right to ask for a copy of any information about you that is used.
2. **Your right to get your information corrected** – you have the right to ask for any information held about you that you think is inaccurate, to be corrected
3. **Your right to limit how your information is used** – you have the right to ask for any of the information held about you to be restricted, for example, if you think inaccurate information is being used.
4. **Your right to object to your information being used** – you can ask for any information held about you to not be used. However, this is not an absolute right, and we may need to continue using your information, and we will tell you if this is the case.
5. **Your right to get information deleted** – this is not an absolute right, and we may need to continue to use your information, and we will tell you if this is the case.

More information on your data rights can be found on the Information Commissioners Office site here: <https://ico.org.uk/fororganisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

The City of Wolverhampton Councils other Privacy Notices can be found here: <https://www.wolverhampton.gov.uk/your-council/ourwebsite/privacy-and-cookies-notice>

The City of Wolverhampton Public Health Privacy notice can be found here:

[https://www.wolverhampton.gov.uk/sites/default/files/2019-06/Privacy%20Notice%20Public%20Health%20May%202019%20final\\_0.pdf](https://www.wolverhampton.gov.uk/sites/default/files/2019-06/Privacy%20Notice%20Public%20Health%20May%202019%20final_0.pdf)

The City of Wolverhampton Covid-19 Privacy notice can be found here:

[https://www.wolverhampton.gov.uk/sites/default/files/2020-09/Covid-19%20Privacy%20Notice\\_0.pdf](https://www.wolverhampton.gov.uk/sites/default/files/2020-09/Covid-19%20Privacy%20Notice_0.pdf)

Public Health England Personal Information Charter can be found here: <https://www.gov.uk/government/organisations/public-healthengland/about/personal-information-charter>

Find out how NHS Digital is using your data in its work to support the government response to coronavirus (COVID-19).

<https://digital.nhs.uk/coronavirus/coronavirus-covid-19-responseinformation-governance-hub>

If you are unhappy or wish to complain about how your personal data is used as part of this programme, you should contact the City of Wolverhampton Council in the first instance.

If you are still not satisfied, you can complain to the Information Commissioners Office. Their website address is [www.ico.org.uk](http://www.ico.org.uk) and their postal address is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **Security**

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. We have written procedures and policies which are regularly audited, and the audits are reviewed at senior level.

### **Data Protection Officer**

The Data Protection Officer for the Council is: The Information Governance Manager – Anna Zollino-Biscotti. Contact them on: [DPO@Wolverhampton.gov.uk](mailto:DPO@Wolverhampton.gov.uk)

### **Automated decision making or profiling**

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### **Changes to our policy**

We keep our privacy notice under regular review, and we will make new versions available on our privacy notice page on our website. This privacy notice was last updated on 8 October 2020.