



PRIVACY NOTICE: COVID-19 RESPONSE

This privacy notice summarises some of the key ways in which Pembrokeshire County Council (as a Data Controller) is collecting and using your personal data in response to the COVID-19 pandemic.

As a public service authority, Pembrokeshire County Council already holds data on citizens, employees and stakeholders. Where we already hold information regarding vulnerability as defined in the current guidance from the Government and Public Health Wales, we may share this for emergency planning purposes or to protect your vital interests by sharing with both internal services and external bodies.

Why we need your information (purposes of processing)

We may use new or existing information held by the Council in order to exercise our statutory public health functions, continue to deliver key services and provide additional services that may be required as a result of the National and Local response to the COVID-19 pandemic. Key statutory public health functions include:

- Managing risks to public health
- Control of infection
- Provide support and health protection
- Preventing illness
- Monitoring safety
- Research and emergency planning
- Analyse patterns and trends to help us create strategies and decision making.

Other service specific areas are explained in further detail below and in the linked privacy notices.

Community Co-ordination Hub

Pembrokeshire County Council is working with volunteers in Community Support Groups to help people who require support as a result of self-isolation.

Personal data is being collected to assess and provide support to adults, children and young people who are in high-risk categories and would be considered vulnerable, if infected with Coronavirus.

[See Community Hub Privacy Notice.](#)

COVID-19 Testing Referral

Referrals for COVID-19 testing of critical workers and household members of critical workers is being collated by Pembrokeshire County Council. [See COVID-19 Testing Privacy Notice.](#)

Free School Meals

In order to ensure pupils eligible for Free School Meals continue to receive a financial supplement for the provision of a meal when the pupil is not attending school, the Council has had to put in place additional measures. In some cases this has resulted in additional information being collected and used. [See Free School Meals Privacy Notice.](#)

Welsh Government Business Grants

Although primarily non-personal business data will be collected, some personal data is collected as part of the application process for Welsh Government Business Grants. [See Welsh Government Business Grants Privacy Notice.](#)

What personal data is being collected?

In order to effectively respond to the COVID-19 pandemic, we may collect and process the following data if deemed necessary and in a proportionate manner:

- Your name
- Your date of birth
- Your home address
- Your email address
- National identifiers such as NHS number, National Insurance number, etc.
- Your phone number (landline and/or mobile numbers)
- Health information
- Financial details
- Other data as required or volunteered.

In most instances we will collect the data from you, however, due to the fast pace of dealing with the pandemic we may receive information from Government bodies, Health, your family members and other third parties.

What is our legal basis for processing your personal data?

The legal basis for processing your data is that it is in the public interest for us to deal with the COVID-19 pandemic.

The General Data Protection Regulations (GDPR) requires specific conditions to be met to ensure that the processing of your personal data is lawful. These relevant conditions are below:

- Article 6(1)(d) – processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- 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 of special categories of personal data, which includes data concerning person's health, are prohibited unless further specific conditions are met. The following conditions for processing such data are:

- Article 9 (2)(h) – processing is necessary for the purposes of preventive or occupation medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of social care systems and services;
- Article 9 (2)(i) – processing is necessary for reasons of public interest in the area of public health;
- Article 9 (2)(j) – processing is necessary for archiving in the public interest, scientific or historical research purposes or statistical purposes.

Who we will share your information with

For the period 1 April 2020 to 30 September 2020, the Council may process confidential patient information under Regulation 3 of the Health Service (Control of Patient Information) (COPI) Regulations 2002.

Wherever possible we use non-identifiable personal information, however, we may need to share your personal data with internal departments, other organisations and third parties, which could include:

- Welsh Government and associated bodies
- UK Government & Agencies
- Health Boards
- Care Providers
- Community Support Groups
- Prepaid Card Providers
- Partner Organisations

Pembrokeshire County Council has a duty to protect the public fund it manages. Therefore, the information that you have provided to us may be used for the prevention and detection of fraud and for auditing purposes both internally and externally.

How long will my personal data be retained by the Council?

Pembrokeshire County Council will only keep your information for as long as is necessary, taking into account of Government advice and the on-going risk presented by COVID-19. At a minimum the information outlined in this privacy notice will be kept for the duration of the COVID-19 response and relevant audit timescales.

Your Rights

Under data protection law, you have rights including:

- Your right to rectification – you have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- In certain circumstances (e.g. where accuracy is contested), to request that the processing of your personal data is restricted;
- In certain circumstances you have the right to object to the processing of your personal data;
- You have the right of access – you have the right to ask us for copies of your personal data. To make a request, please contact:

Access to Records
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: accesstorecords@pembrokeshire.gov.uk Telephone: 01437 775798

Complaints and Queries

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: dataprotection@pembrokeshire.gov.uk

Telephone: 01437 764551

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Website: <https://ico.org.uk/>

Telephone No: 0303 123 1113

Our Contact Details as Data Controller are:

Pembrokeshire County Council, County Hall, Haverfordwest, Pembrokeshire, SA61 1TP. Telephone number: 01437 764 551 or enquiries@pembrokeshire.gov.uk

Our Data Protection Officer's information is detailed above in the Complaints and Queries section.

Changes to this privacy notice.

We keep our privacy notice under regular review.