

COVID-19 Supplementary Privacy Notice

You can view the general HOT Privacy Notice on our website www.regen.org.uk which contains more information on how we collect, use and protect personal data generally, as well as your rights as a data subject.

What information do we collect and how will we use it?

In order to best respond and help coordinate the community response for COVID-19 it is necessary to collect basic details about you including your name, address, telephone number and email address. To deal with service delivery and bookings we may also ask you for sensitive personal data that you have not already supplied, for example, your age or if you have any underlying illnesses or are vulnerable. This is so we can assist you and prioritise our services. Whilst we may already hold data about you, you may have provided this information for a specific reason and normally we would seek to inform you that the data provided would be being used for a different reason, however, due to the rapidly emerging situation regarding the current pandemic this will not always be possible. Additionally at this time, we may seek to collect and process information from you, which is above and beyond what would ordinarily be collected. This is necessary to ensure your safety and well-being, however we will ensure that this will be limited to what is proportionate and necessary for us, in accordance with Government guidance, to manage and contain the virus and enable us to effectively keep people safe, put contingency plans into place to safeguard those who are vulnerable and to aid business continuity.

What is the lawful basis for processing personal data?

The legal basis for processing your data is that it is in the public interest for us to deal with the outbreak of COVID-19. The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are:

Article 6(1) (d) GDPR - processing is necessary in order to protect the vital interests of the data subject or another natural person.

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Recital 46 adds that "some processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread".

Article 6(1)(e) GDPR – 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.

The processing of special categories of personal data, which includes data concerning a person’s health, is prohibited unless specific further conditions can be met as follows:

Article 9(2)(i) GDPR – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.

Schedule 1, Part 1(3) Data Protection Act 2018 – processing is necessary for reasons of public interest in the area of public health, and is carried out by or under the responsibility of a health professional, or by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law.

Article 9(2)(g) GDPR - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

The legislations, policies and guidance that relate to this service include, but are not limited to:

The Civil Contingencies Act 2004 and (contingency planning) Regulations 2005 Allows the local authorities continue to exercise its functions in the event of an emergency

The Local Government Act 2000 - Give powers to local authorities to promote economic, social and environmental well-being within District

Care Act 2014 - legal framework for local authorities support the individual’s ‘wellbeing’.

Who are we likely to share this information with?

In this current pandemic, we may share your personal data internally within our various departments and services as well as externally with other public authorities, emergency services, and other stakeholders, as necessary and proportionate to do.

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Storing your information

We will only keep your information for as long as it necessary, taking into account Government advice and the on-going risk presented by Coronavirus. As a minimum the information outlined in this privacy notice will be kept for the duration of the COVID-19 response. Where possible we will anonymise your personal data so that you cannot be identified. When the information is no longer needed for this purpose, it will be securely deleted.

Further information

The Information Commissioner's Office has published its own FAQs on data handling during the pandemic. If you would like further information about how we manage your data, please see the Halifax Opportunities Trust privacy notice. If you have any concerns or additional questions about how your personal data is handled, please contact the Data Protection Officer at privacy@regen.org.uk.

Amendments

We may amend this Privacy Notice at any time so please review it frequently. The date at the top of this page will be amended each time this notice is updated.

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