

DATA PROTECTION PRIVACY NOTICE FOR TEST AND TRACE PAYMENTS

Why are we providing this Notice to you

The Council, in its capacity of Data Controller, holds certain information about you ('personal data') which it needs to process for the purpose of providing the following service of administering decisions about Test and Trace Payments as part of the government's measures to support and enforce self-isolation during the COVID-19 pandemic. This Notice is designed to give you information about the personal data we hold about you, how we will use it, your rights in relation to it and the safeguards that are in place to protect it.

Further information is contained in the Council's Generic Data Protection Privacy Notice which can be found at: www.hillingdon.gov.uk/privacy

What personal data do we hold

The types of data we hold and process will typically include:

- Your name and the names of all other residents of your address, and the relationships of the other occupants to you. This includes children
- Your address
- Your gender and that of other residents of your address
- The dates of birth for you and other residents in your address
- The National Insurance number of you, your partner(s) (if any) and sometimes other residents of your address
- Details and evidence of your income, and the income of other residents of your address. Details and evidence of your capital, and the capital of other residents of your address. Details and evidence of your rent and the rent of other members of your address
- Other information which is relevant to your claim(s)
- Contact information including telephone numbers and email addresses
- We sometimes hold information on marital status, ethnicity, nationality, and health/personal circumstances
- Wage slips supplied to us may contain details of Trades Union membership
- If you have an appointee, then we will hold details of them
- Health Data, in terms of satisfying the criteria for Test and Trace payments

We obtain some of this data directly from you and we may also obtain it from other sources.

Other sources of data typically includes:

The Department of Work and Pensions. For further details, please contact your Jobcentre Plus Office. The website address for the Department of Work and Pensions is www.gov.uk/government/publications/dwp-request-for-personal-information)

HM Revenue and Customs. For further details, please contact advice.dpa@hmrc.gsi.gov.uk or write to The Data Protection Officer, Her Majesty's Revenue and Customs, 10 South Colonnade, Canary Wharf, London, E14 4PU.

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 additional personal data in relation to your application for a Self-Isolation Payment.

Further information regarding the NHS test and trace data system to administer support payments resulting from the COVID19 pandemic can be found at <https://contact-tracing.phe.gov.uk/help/privacy-notice>

What is our purpose for processing your personal data

Administering Test and Trace Support Payments as a result of the COVID-19 pandemic.

We will also process personal data to prevent and detect fraud and error.

If we intend to process your personal data for a purpose other than that for which the personal data was collected, we shall provide you details of that other purpose before we start processing your data.

What is the legal basis for our use of your personal data

One or more of the following bases can apply:

- We have obtained your freely given and specific consent and have informed you that you have the right to withdraw it at any time.
- We need it to comply with a legal obligation.
- We need to protect the vital interests of a person.
- We need it to perform a task in the public interest or in the exercise of official authority.

What we do if your personal data is sensitive

We will only process your sensitive personal data with your consent, unless we can lawfully process it for another reason permitted by law. We will notify you if it is sensitive and as with non-sensitive personal data, you have the right to withdraw your consent to processing at any time by letting us know. Sensitive data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data, data concerning health or data concerning a natural persons sex life or sexual orientation.

For how long will we hold your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purpose[s] for which it is collected and for so long afterwards as we consider it may be required to deal with any questions, complaints or audit about the service which we provide to you, unless we elect to retain your data for a longer period in order to comply with our legal and regulatory obligations..

Organisations that we may share your personal data with

We use a company, Liberata, to process some data including answering telephone calls and scanning documents

We share information with the Department of Work and Pensions (DWP)

We may share information with appointees and representatives

We may share information with other Councils as permitted by law, or with your permission

External auditors

Decision notices are printed by an external printing company

The Rent Service

We may share information with The Local Government and Social Care Ombudsman

The NHS test and trace data system (which is part of the Department of Health and Social Care).

Internal Sharing of data

We may share some of your data with other services within the London Borough of Hillingdon. Common examples include:

Complaints and Enquiries

Internal Audit

Counter Fraud

Corporate Payment Team

The Housing Benefit and Council Tax Reduction Team

Occasionally the overpayment recovery team

What happens if your personal data is subject to automated decision-making including profiling

We are not using automated decision making.

Your rights

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances, you may also have a right to ask us to restrict processing of your data until any errors are corrected, to object to processing or to transfer or in very limited circumstances erase your personal data. You can obtain

further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline 0303 123 1113.

If you wish to exercise any of these rights, please contact The Benefits Team (contact details below). You also have the right to lodge a complaint in relation to this Privacy Notice or our processing activities with the Information Commissioner's Office, which you can submit through their website (details above) or through their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the service that we provide to you.

Updates

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

Contacting us

Please contact benefits@hillingdon.gov.uk for further information

Benefits
PO Box 1120
1 Market Street
Nelson
Lancs
BB9 7LJ

Statutory Data Protection Officer

You may also contact our data protection officer for further information:

Raj Alagh, Borough Solicitor and Monitoring Officer
Data Protection Officer
Civic Centre
High Street
Uxbridge
UB8 1UW
E-mail: ralagh@hillingdon.gov.uk Telephone: 01895 250617