



TRINITY HOUSE

## COVID-19 Contact Tracing Scheme Data Protection Privacy Notice

- **UK Contact Tracing Schemes**

Trinity House has taken steps to ensure that all persons using Trinity House premises, whether visitors, staff or contractors can do so safely consequent to the significant public health risks presented by the global COVID-19 pandemic. Such steps include, for instance, cooperation with the official UK COVID-19 Contact Tracing Schemes established in England and Wales. In England, the COVID-19 contact tracing scheme is operated by NHS *Test and Trace* and in Wales it is operated by NHS Wales *Test, Trace and Protect*.

These schemes, by their nature, involve Trinity House (as a Data Controller) collecting, processing and sharing certain information about you (your personal data) with the operators of the respective contact tracing schemes.

- **Information we will ask you to provide when visiting Trinity House premises**

When visiting Trinity House premises (including its Headquarters and Depots), whether as a member of the public, official visitor or for work (employee or contractor), Trinity House will request that you provide certain information about you. In such circumstances, Trinity House will also note certain details about your visit:-

**The details that we will request from you include:-**

- Name
- Contact Telephone Number<sup>1</sup>

**Details that we will record about your visit**

- Date of visit, arrival time and departure time (or am. / pm indication in the case of staff)

If you do not wish to provide the above information for contact tracing purposes this **will not**, in itself, prevent access to Trinity House premises (excepting Trinity House, London). Disclosure of information for COVID-19 contact tracing purposes is **voluntary**<sup>2</sup>. <sup>2</sup>*NB. Separate requirements apply in respect of Trinity House, London – see further below.*

However, for health & safety purposes more broadly, fire safety procedures and/or security reasons you may be asked to verify your identity and to register your attendance separately in accordance with existing access control procedures. However, any personal data collected for such purposes, and which are subject to separate Data Protection controls (please see below), will **not** be used for COVID-19 contact tracing purposes.

<sup>1</sup>*Please note, in the case of Trinity House staff, existing personal contact telephone numbers held by the Trinity House Human Resources (HR) Department will be used for contact tracing purposes.*

Staff may be asked to verify their contact details by the Trinity House HR Department from time to time in line with the Employee Personal Data Privacy Notice.

Having agreed to the use of your personal data for contact tracing purposes (as set out above), you have a right to request that Trinity House stops or restricts processing of your personal data, to erase any information it holds on you in this regard and to have access to your personal data. These rights are subject to the provisions of the GDPR and UK Data Protection Act 2018.

- **Lawful basis**

The lawful basis identified by Trinity House in respect of personal data processed and shared for the purposes of contact tracing is: **Legitimate Interests**<sup>3</sup> *<sup>3</sup>NB. A different lawful basis applies in respect of Trinity House, London – see further below.*

- **How will we share your personal data**

Personal Data collected for the purposes of a COVID-19 contact tracing scheme will be shared by Trinity House with **NHS Test and Trace (in England)** and with **NHS Test, Trace and Protect (in Wales)** and any other legitimate UK Public Health Authority. The personal data will be shared, when asked to do so by the above mentioned organisations, consequent to public health enquiries relating to an outbreak of COVID-19 or the infection of an individual with COVID-19. This will involve Trinity House providing the operators of the relevant scheme and individual contact tracers with your details. Please note that Trinity House will **not** be able to contact you before sharing your details to the relevant contact tracing scheme. You should always take appropriate steps, in line with Government guidelines, to verify the credentials of anyone purporting to be from a contact tracing scheme.

Please note that those working for contact tracing schemes **will not**:

- ask for bank details or payments.
- ask for details of any other accounts, such as social media.
- ask you to set up a password or PIN number over the phone.
- ask you to call a premium rate number, such as those starting 09 or 087.

- **How long we will keep your personal data**

Personal Data collected for the purposes of a COVID-19 contact tracing scheme will be erased by Trinity House after a period of 21 days from the date on which you provided your details to Trinity House.

- **What happens to your personal data after it has been shared for contact tracing purposes**

Once your personal data has been shared by Trinity House with the operator of a COVID 19 contact tracing scheme (effectively another Data Controller) your personal data will also be subject to the Data Protection protocols established by the operator of the relevant contact tracing scheme. In such circumstances your personal data may be retained by the operator of the scheme for a period beyond 21 days, possibly for an extended period, in accordance with the Data Protection requirements and legal basis applicable to the processing of your personal data by the relevant operator of the scheme.

To find out more about how your personal data may be processed in this regard:-

For NHS Test and Trace (England)

<https://www.england.nhs.uk/contact-us/privacy-notice/>

For NHS, Test, Trace and Protect (Wales)

<https://www.wales.nhs.uk/privacystatement>

Trinity House will still delete your personal data after 21 days after it has been shared with the operator of a contact tracing scheme.

- **Our Data Protection Officer**

If you have any concerns, further questions or wish to make a complaint as to how Trinity House processes and shares your personal data for contact tracing purposes you can contact our Data Protection Officer by writing to the following address:

Data Protection Officer

Trinity House Tower Hill

London EC3N 4DH

or by Email: [data.protection@trinityhouse.co.uk](mailto:data.protection@trinityhouse.co.uk)

If you wish to find out about how Trinity House processes your data more generally and your rights in this regard as a data subject, you can view a copy of our **Data Protection Privacy Notice** by going online at <https://www.trinityhouse.co.uk/>

- **Information Commissioners Office**

If you wish to make a complaint as regards the manner in which Trinity House is processing and/or sharing your data, and you feel that the matter has not (or cannot) be suitably addressed, by Trinity House you may raise the matter with the Information Commissioners Office (ICO).

Contact details for the ICO are as follows:-

Information Commissioner

Wycliffe House Water Lane

Wilmslow Cheshire

SK9 5AF

[www.ico.org.uk](http://www.ico.org.uk)

Telephone: 0303 123 1113.

### **Special Requirements in Respect of Personal Data Collected for NHS Test and Trace and Access to Trinity House, London**

In accordance with the requirements of the *Health Protection (Coronavirus, Collection of Contact Details etc. and Related Requirements) Regulations 2020/(SI No.1005)* ("the regulations"), the **lawful basis** for the processing of personal data pursuant to the support of NHS Test and Trace in respect of access to Trinity House, London EC3N 4DH is **Legal Requirement**.

As such, all persons entering Trinity House, London (subject to certain exemptions applicable under the above regulations) will be required to register attendance and provide contact details in support of the NHS Test and Trace scheme. Individual may either use the official NHS QR Code app and scan the relevant QR code on entry or otherwise provide details which will be recorded on a register either in hard copy or electronically\*.

\*Any Trinity House staff attending Trinity House, London will be required to complete a self-declaration of attendance in the approved register regardless of whether or not the NHS QR Code is scanned upon entry.

Please note the requirement for the recording of attendance and declaration of contact details is no longer voluntary in respect of access to Trinity House, London.

In the event that contact details are not provided at the point of entry or the details provided are not believed to be accurate in Trinity House's reasonable opinion access to the premises **will not be permitted**.

In accordance with the above regulations, Trinity House may request that those wishing to gaining entry to Trinity House, London show proof of identification where it has reasonable belief to doubt the validity or accuracy of contact details provided for NHS Test and Trace purposes. Copies of any identification shown pursuant to the above will not be taken or retained.

The personal data that Trinity House will ask to be provided includes:-

- (a) name of the individual wishing to gain access;
- (b) a telephone number by which the individual may be contacted;
- (c) an e-mail address if the individual is unable to provide a telephone number;
- (d) a postal address if the individual is unable to provide an email address;
- (e) the date and time that the individual entered the premises;
- (f) where the individual is a member of a group seeking permission to enter relevant premises together, the number of people in that group (including any member of the group that has scanned a QR Code when seeking to enter the relevant premises).

The processing of personal data by Trinity House pursuant to the above will otherwise continue to be subject to the other provisions of this Privacy Notice.

The special requirements detailed above do not affect your legal rights as a data subject under the provisions of the GDPR and the UK Data Protection Act 2018.

Please see guidance published by the Information Commissioner's Office online at:

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/coronavirus-recovery-data-protection-advice-for-organisations/collecting-customer-and-visitor-details-for-contact-tracing/>