

## Privacy Notice: COVID CARE NI Advisory Service

**Data Controller Name:** Transformation Directorate; DoH

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**Data Protection Officer Name:** Charlene McQuillan

**Telephone:** 028 9052 2353

**Email:** [DPO@health-ni.gov.uk](mailto:DPO@health-ni.gov.uk)

### Background

- Contact tracing is an established public health measure for the control of infections such as COVID-19. The Department of Health 'Covid-19 Test, Trace and Protect Strategy', published on 27 May 2020, sets out the public health measures to be put in place to help contain and reduce the spread of Covid-19 and minimise the risk of a second wave of infection.
- The Contact Tracing Service in NI is operated by the Public Health Agency (PHA). This is a manual phone-based contact tracing system staffed by health professionals and staff with a background in healthcare. A digital "proximity app" solution is also currently under development which will complement the manual contact tracing service.
- The Covid Care NI Advisory Service, which has been established by the DoH through NI Direct, is also a key component of the Contact Tracing Service. The service will provide information, guidance and support to people who are unable to use the digital platforms to check symptoms, book tests or find advice on self-isolating and will provide support to assist them to do this, or to do this on their behalf.

### Introduction

- This Privacy Notice describes the type of personal data collected by NI Direct on behalf of the Department of Health (DoH) as part of the Covid Care NI Advisory Service, the way that it is used and your rights in respect of this. The Covid Care NI Advisory Service provides the following services:
  - (i) Assisting callers with checking symptoms and getting appropriate advice. The **COVID Care NI (Symptom Checker) on line system** has been made available to help individuals to establish if they are displaying any of the recognised signs of coronavirus and to advise on next steps based on the outcome of the assessment. If required, the call handler will be able to assist you in using the on line system, or will

use the system for you, taking you through the various questions and providing you with the resulting advice. Advice on how your data is processed by the on line system can be found in the related Privacy Notice <https://www.health-ni.gov.uk/publications/privacy-notice-covidcare-ni-symptom-checker-app-department-health-doh>.

- (ii) Advice on **Booking a test** is also provided through the Advisory Service including the option for arranging a test at one of the designated sites across NI or by using a home test kit, through the established Test Booking services. The call handler will be able to offer advice on the options depending on your individual circumstances and, if required, assist you with completing the online system for booking a test. Further information about how your data is processed as part of the Test Booking system can be found in the related Privacy Notice <https://www.publichealth.hscni.net/sites/default/files/2020-05/NCTP%20%28PHA%29%20Privacy%20Notice.pdf>.
- (iii) In some circumstances you may have a query that your call handler cannot provide advice on. In these cases your query may be referred to the Public Health Agency for further advice. This will be done in an anonymised format **with the minimum amount of information included to enable PHA to advise on the query**. As such there is no personal data forwarded to PHA. Once a response is received from PHA by the Advisory Service you will be contacted and provided with the response. Records in relation to this part of the service, including related correspondence, will be retained by NI Direct for a period of 2 years in accordance with their approved retention schedule. For further information about how your data will be processed by NI Direct, see their [Privacy Notice](#)

### **Why are you processing my personal information?**

- We are processing personal information of callers to the Covid Care NI Advisory Service to ensure that appropriate advice is given to anyone who makes contact with the service.
- When you contact the service for assistance or advice, the call handler may request personal data from you, for example, to complete the symptom checker or booking a test on your behalf (see above).
- In addition, the information you provide may be used to help improve the Covid Care NI Advisory Service; for training and quality purposes; to investigate complaints; or to get feedback about NI Direct services. This information may also apprise policy decisions and plan for future epidemiological analysis. However the minimum amount of data will only ever be used and data, for most of these purposes, will be anonymised. All data will be processed in line with data protection requirements.
- The lawful basis for processing personal information for this purpose is covered under Article 6 (1) (e), (performance of a task carried out in the public interest) and Article 9 (2) (i), (reasons of public interest in the area of public health), of the EU General Data Protection Regulation (GDPR). Under DPA

2018, Schedule 1, Part 1, Condition 3 (Public Health) applies to the processing of special category data.

### **What categories of personal data are you processing?**

- When you use the Covid Care NI Advisory Service, the call handler will require certain information about you including your name, your preferred contact method (email or letter), and your address or email details, depending on the nature of your call, as well as a description of your inquiry.
- When the call handler has to access certain online facilities to complete information on your behalf, they will ask you for other information including things like your age; phone number; vehicle registration number (for booking a test); or things like whether you have a high temperature, normally receive a flu jab and other health related questions, (in order to complete the symptom checker).
- As advised above, for full privacy information about those facilities and how your personal data is handled within those online facilities please see the applicable Privacy Notices linked above.

### **Where do you get my personal data from?**

- Personal data will be collected from NI Direct on behalf of DoH and is provided by the callers themselves as part of the information they provide to ensure the appropriate advice and service is being given.
- Your personal information may be recorded when you make a telephone call to the Covid Care NI Advisory Service for customer quality assurance and training purposes.
- See NI Direct web service Privacy Notice for further information:  
<https://www.nidirect.gov.uk/articles/nidirect-web-service-privacy-notice>

### **Do you share my personal data with anyone else?**

- No. In the event that the Covid Care NI Advisory Service are unable to assist with your query then the issue may be referred to PHA for advice. This will be done in an anonymised format.

### **Do you transfer my personal data to other countries?**

- No, your personal data is not transferred to any other countries.

### **How long do you keep my personal data?**

- NI Direct will only retain your data for as long as necessary for the purposes outlined above.
- There will be no personal information processed, or retained, by DoH as part of this service.
- Correspondence, in an anonymised format, shared with PHA, may be retained by the PHA for up to 8 years in accordance with the approved

Retention and Disposal Schedule Good Management Good Records  
<https://www.health-ni.gov.uk/topics/good-management-good-records>.

- Your personal data will be held by NI Direct for a maximum period of 2 years in accordance with their approved retention schedule. Retention and disposal instructions for NI Direct will be covered as part of the Memorandum of Understanding DoH have established with NI Direct, for the purposes of providing this service for the Department and to ensure appropriate governance is in place regarding the processing of all associated information.

### What rights do I have?

- You have the right to obtain confirmation that your data is being [processed, and access to your personal data](#)
- You are entitled to have personal data [rectified if it is inaccurate or incomplete](#)
- You have a right to have personal data erased and to prevent processing, [in specific circumstances](#)
- You have the right to 'block' or suppress processing of personal data, [in specific circumstances](#)
- You have the right to data portability, [in specific circumstances](#)
- You have the right to object to the processing, [in specific circumstances](#)
- You have rights in relation to [automated decision making and profiling](#)

### How do I complain if I am not happy?

If you are unhappy with how any aspect of this privacy notice, or how your personal information is being processed, please contact the *Department's Data Protection Officer using the contact details above*.

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

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

Tel: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://ico.org.uk/global/contact-us/>