

Privacy Notice
DoH Managed Isolation (Exemptions and other uses)

Data Controller Name: **Department of Health (DoH)**
Branch: **Managed Isolation Team**
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Why are you processing my personal information?

Under [The Health Protection \(Coronavirus, International Travel\) Regulations \(Northern Ireland\) 2021](#)¹ persons returning from Red list countries to Northern Ireland are obliged to obtain and pay for a designated Managed Isolation Package (MIP), which includes transport, tests, meals and accommodation and quarantine for ten days (11 nights).

The Department of Health for Northern Ireland (the 'Department') uses the UK Government's Department of Health and Social Care (DHSC) and their contractors to deliver managed isolation here. The vast majority of processing of personal data in respect of Northern Ireland is therefore carried out and led by DHSC and its contractors. DHSC is a joint controller of the personal data for the Managed Quarantine Service (MQS) purposes outlined in its Privacy Notice, which can be accessed at [Quarantine Booking \(ctmportal.co.uk\)](#).

Some of the data gathered by DHSC, their arm's length bodies and their contractors as part of managed isolation is shared by them with the Public Health Agency (PHA) for COVID track and trace purposes, with those uses covered by the PHA Privacy Notice [Privacy information | HSC Public Health Agency \(hscni.net\)](#) and the NHS Test and Trace Privacy Notice.²

¹ These Regulations have been, and continue to be, amended since they were made; you can access the latest available version at [The Health Protection \(Coronavirus, International Travel\) Regulations \(Northern Ireland\) 2021 \(legislation.gov.uk\)](#)

² <https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information/testing-for-coronavirus-privacy-information-quick-read--2#lawful-basis-for-processing-your-personal-data>

There are, however, several situations where the Department needs, or may need, to process personal data directly, including:

- for the purposes of dealing with requests from individuals for exemptions from managed isolation. The Department is responsible for considering whether an exemption can be granted, applying tests in legislation as to eligibility, including confirming that alternative isolation arrangements are satisfactory; and
- for compliance or enforcement, in an emergency where it may be the quickest way to minimise the risk of variants of concern passing, safeguarding, for policy decisions and planning, or for agreeing costs or policies with DHSC or others.

Medical, Compassionate and Carer Exemptions

You are requested to provide the Department with evidence to support your application for a medical, carer or compassionate exemption. This evidence will inform the Department's decision, including any determination on alternative isolation arrangements.³

If you're applying as a carer, or are being cared for, note that it will be necessary for the Department to obtain information in relation to both carer and recipient of care to determine if it is necessary for the carer to accompany the recipient of care in the determined alternative arrangements.⁴

Similarly, where a relative is near death it will be necessary to obtain information about them to confirm that the statutory test is satisfied.⁵

Other Exemptions⁶

There are a number of circumstances where alternative arrangements to managed isolation may be determined by the Department, for example where the individual(s) is an asylum seeker or is in police custody.

It is unlikely we will collect or process personal information in such circumstances. These purposes are though noted here for completeness and this Privacy Notice

³ Paragraphs 17 and 20 to 21 of Schedule 7 of the Health Protection (Coronavirus, International Travel) Regulations (Northern Ireland) 2021

⁴ Schedule 7 paragraph 20(2) of the Health Protection (Coronavirus, International Travel) Regulations (Northern Ireland) 2021

⁵ Schedule 7 paragraph 21 of the Health Protection (Coronavirus, International Travel) Regulations (Northern Ireland) 2021.

⁶ These exemptions are listed in Schedule 7 paragraphs 17 18, 19, 20, and 22 of the Health Protection (Coronavirus, International Travel) Regulations (Northern Ireland) 2021.

may be updated to reflect any developments in relation to the processing of personal data for other exemption purposes.

Other reasons we may process your information

We may sometimes need to seek information from and share information with DHSC, their MQS contractors and other statutory agencies including PSNI, PHA, Border Force and the other parties referred to in the MQS Privacy Notice referred to above. This may be done:

- for compliance or enforcement;
- in an emergency, where it may be the quickest way to minimise the risk of variants of concern passing;
- for safeguarding;
- for policy decisions and planning; or
- for agreeing costs or policies with DHSC or others.

It is not anticipated that personal information would be routinely needed or accessed for policy, planning or financial reasons, however, these purposes are noted here for completeness.

This Privacy Notice will be kept under review and updated when required. Where personal information is shared, it will be in line with data protection requirements and only the minimum amount necessary.

Lawful conditions for processing your personal data

The lawful basis for processing your personal information for the above purposes is covered under:

- UK GDPR 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;
- UK GDPR Article 9(2)(i) – processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare;
- Data Protection Act 2018 Schedule 1 Part 1 (3) – public health purposes;
- The Department exercised powers under sections 25B and 25F of the Public Health Act (Northern Ireland) 1967, as amended by the Coronavirus Act 2020, which provides the basis for the issue of the regulations upon which it relies- Health Protection (Coronavirus, International Travel) Regulations (Northern Ireland) 2021; and

- The Health and Personal Social Services Order 1972 Article 7 also contains a power to make arrangements for the prevention of illness and to recover associated charges.

Potential scenarios could also arise requiring processing under:

- UK GDPR Article 9(2)(g) – the processing is necessary for reasons of substantial public interest; and
- Data Protection Act 2018 – Schedule 1, Part 2 (6) para (1) – for reasons of substantial public interest.

What categories of personal data are you processing?

The personal data we hold and process might include some, but is unlikely to include all, of the following in relation to you and others:

- names;
- home telephone numbers;
- personal mobile telephone numbers;
- personal e.mail addresses;
- home addresses;
- passport details;
- flight details;
- red list country of origin and any transit countries;
- managed isolation package booking information
- evidence provided by you when claiming an exemption, including supporting medical evidence and other justifying information, for example
 - evidence of satisfying status requirements listed in **Annex 1**;
 - evidence about a dying relative or someone you care for;
 - the location of any proposed alternative to isolation and the transport that will be used;
 - the contact details of the medical team in charge of you, a dying relative, or someone you care for
- evidence from other sources, including medical and non-medical evidence about you, a dying relative or someone you care for, including COVID status or test results
- records of any exemption decision and reasons

Information will be captured on a case by case basis, dependent on the exemptions being considered and the associated evidence and information required. We will only ever request and process the minimum amount of personal data necessary in each case.

Where do you get my personal data from?

Personal data is provided by you to allow the Department to make an informed decision on your exemption from managed isolation. We may also, however, contact clinicians in relation to your case, or for information about a relative, or someone you care for, depending on the exemption claimed by you or them.

Sometimes, you, DHSC, DHSC's contractors or other statutory agencies such as the Home Office, PSNI and healthcare providers may pass this information to us to enable us to make a decision regarding your exemption from managed isolation.

A separate Privacy Notice on [Quarantine Booking \(ctmportal.co.uk\)](https://ctmportal.co.uk) exists for the booking and management of formal managed quarantine which is organised by DHSC and its associated contractors. The Department's team can access details or summary information in relation to NI associated bookings, which is held by DHSC and its contractors, as and when needed for the purposes mentioned here, but does not routinely access the personal information held by DHSC or their contractors.

In some situations, typically emergencies, personal information may be provided by or sought from another Government agency, or a contractor of theirs, rather than being sought from you.

Do you share my personal data with anyone else?

We may need to share your information with the PHA, your GP, or specialists in Health Trusts, in order to make an exemption decision and generate an alternative isolation arrangement.

If you are already in managed isolation, the PHA will make any temporary compassionate leave decision under Schedule 11 9(c), (d) and (e) and the Department, or others, may pass your information to them to support such a decision if you have made an application to us.

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- for compliance or enforcement;
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Do you transfer my personal data to other countries?

No. The data is not transferred to any other countries.

This statement does not cover data where another related Privacy Notice is in issue, such as NHS Test and Trace or the MQS Privacy Notice referred to above.

How long do you keep my personal data?

Data is retained in the Department for up to 8 years, in accordance with our Retention and Disposal Schedule, [Good Management](#), [Good Records](#).

Where the Department holds personal information about you under this Privacy Notice, it envisages that it will only keep your personal data for as long as it is needed for the purposes of the COVID-19 emergency and for audit purposes. This is however subject to review as the Emergency and the service develops.

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

Areas in [The Health Protection \(Coronavirus, International Travel\) Regulations \(Northern Ireland\) 2021 \(legislation.gov.uk\)](#) where the Department is potentially involved in the decision on quarantine exemptions

Paragraph 18:

- A person requiring urgent medical attention
- A person on immigration bail
- A person who has been detained by an immigration officer
- A person refused leave to enter the UK
- An illegal entrant
- An asylum seeker
- A person who is in police custody
- An unaccompanied child
- A prisoner
- A potential victim of modern slavery

Paragraph 19:

- Boarding school pupils

Paragraph 20:

- Vulnerable as a result of a severe condition and carer

Paragraph 21:

- Visiting dying or severely ill persons

Paragraph 22:

- University Students