

Data Collection & Privacy Notice – Covid-19 – NHS ‘Test & Trace’

Within the Covid-19 advice from HM Government is an obligation on hospitality businesses such as pubs to support the NHS ‘Test & Trace’ scheme, which is a key Government initiative to contain any Covid-19 clusters & outbreaks.

In light of the re-opening of The Crown Inn, we are required to assist the NHS ‘Test & Trace’ programme by keeping a temporary record of our customers & visitors, & to assist NHS ‘Test & Trace’ with requests for that data if needed.

NHS ‘Test & Trace’ & the law

The law on protecting personally identifiable information, known as the General Data Protection Regulation (GDPR), allows Public Health England to use the personal information collected by NHS ‘Test and Trace’. The section of the GDPR that applies is:

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’

As information about health is a special category of personal information, a further section of the GDPR applies:

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’

Public Health England also has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without people’s consent where this is in the public interest.

Pending receipt of further details from HM Government on this initiative & any mandated process, we have implemented our own process of data capture & recording compliant with data protection legislation, specifically the Data Protection Act 2018.

Q & A

What personal data do we require?

We shall require the full name + phone number (or email address) of the ‘lead booker’, that is, the person making the booking reservation.

It is assumed that the lead booker will know & so have access to the contact details of all members of the party. However, if members of the party are not known to the lead booker, their full name + phone number/email address should also be provided please.

How will the data be recorded?

Collected data will be recorded manually on a dated daily attendance register, that will also record the time of arrival.

Where will the data be stored?

Collected data will be stored securely so as to be outside of access by members of the public & staff members, other than those authorised to collect the data.

To whom will the data be shared?

We shall only share the collected data with the NHS via its agents engaged in the 'Test & Trace' programme.

How long will this data be retained for?

In accordance with Government request, the contact data collected will be retained for 21 days beyond the date of each attendance at The Crown Inn.

How will my data be destroyed?

Data will be destroyed by shredding.

Should you have any further questions on the subject, please contact us.

Thank you.