

## Managed Quarantine Service Privacy Notice

On 12<sup>th</sup> February 2021, the UK Government passed into law new legal requirements for individuals entering the England from international locations to help control and prevent the potential spread of COVID-19 variants.

On 15<sup>th</sup> February 2021, the Scottish Government passed into law new legal requirements for individuals entering Scotland from international in response to the serious and imminent threat to public health which is posed by the incidence and spread of COVID-19 in Scotland.

On 16<sup>th</sup> April 2021, the Department of Health (NI) introduced legislation for individuals entering Northern Ireland from international locations.

If you arrive after these dates, we will need to process your personal data to deliver the Managed Quarantine Service. This Privacy Notice sets out the [personal data](#) we will use, how we will use it, and why we need to use it.

### Data Controller

The Department of Health and Social Care (DHSC) is the Data Controller for the Managed Quarantine Service, including the use of Passenger Locator Form data.

The Scottish Government is the Data Controller for the Managed Quarantine Service, as far as it applies to Scotland.

The Executive Office (TEO) is a Data Controller for the Managed Quarantine Service, as far as it applies to Northern Ireland.

The Home Office is the Data Controller for the collection of the [Passenger Locator Forms](#) and associated data when provided to Border Force.

### The Managed Quarantine Service

If you are entering England, Northern Ireland or Scotland from a country or territory classified by the UK Government as [GREEN](#), you will be required to:

- Undertake a COVID-19 test at home on Day 2 after your arrival

If you are entering England, Scotland or Northern Ireland from a country or territory classified by the UK Government as [AMBER](#), you will be required to:

- Self-isolate for a period of at least 10 days from your date of arrival at an address in England, Scotland or Northern Ireland
- Undertake a COVID-19 test at home on Day 2 and Day 8 of your self-isolation period

If you are entering England, Scotland or Northern Ireland from a country or territory classified by the UK Government as [RED](#), you will be required to:

- Quarantine at a designated quarantine facility for a period of at least 10 days from your date of arrival
- Undertake a COVID-19 test at the quarantine facility on Day 2 and Day 8 of your quarantine period

You can view the latest advice and list of red areas [here](#) for England and Scotland arrivals and [here](#) for Northern Ireland arrivals.

## Categories of personal data we collect and process

We collect and process the personal data that you provide to us when booking the relevant Managed Quarantine Service package, when you complete a Home Office Passenger Locator Form, if you stay at a Quarantine Hotel Facility and when you take a COVID-19 test, which may include:

- Full name;
- Full residential address;
- Email address;
- Mobile telephone number;
- Home telephone number;
- Details of the countries visited in your trip;
- Date of Birth;
- Gender;
- Vehicle registration number (where you are required to quarantine and the vehicle is in an airport car park);
- COVID-19 test results, including ethnicity;
- Details of the Managed Quarantine Service package you have booked, including, where applicable, the quarantine facility you will be staying at, any pre-existing medical conditions that may impact your quarantine, a copy of your photo ID, passport number and any dietary requirements we may need to cater for during any stay;
- Payment card details when purchasing a Managed Quarantine Service package
- Bank account details where you may be entering into a payment plan arrangement for your Managed Quarantine Service package

Further information on how your data may be used when taking a COVID-19 test can be found [here](#)

Further information on how your data may be used in COVID-19 contact tracing can be found [here](#)

## Source and categories of personal data

We will obtain data from the following sources:

- Directly from you when you use this service and/or interact with the NHS Test & Trace Programme, including the booking of any Managed Quarantine Service package
- From the Home Office, including the information you have provided on your Passenger Locator Form
- From NHS Digital when you have ordered COVID-19 test kits to be sent to your home or self-isolation address
- From the quarantine hotel facility and security company where you are staying for any quarantine period
- From Public Health England, Public Health Scotland or the Northern Ireland Public Health Authority to understand the results of any COVID-19 tests you may have taken

## What we use your personal data for

If you are entering England, Northern Ireland or Scotland from a country or territory classified by the UK Government as **GREEN** we will use your personal data to:

- Process your order and payment for a home testing kit

- Processing your COVID-19 tests and advising you of the results
- If required, to carry out contact tracing activities

If you are entering England, Scotland or Northern Ireland from a country or territory classified by the UK Government as **AMBER**, we will use your personal data to:

- Process your order and payment for home testing kits
- Processing your COVID-19 tests and advising you of the results
- Contacting you about your self-isolation compliance
- If required, to carry out contact tracing activities
- Where applicable, to enforce the legal requirements to provide accurate information, to self-isolate and to take the mandated COVID-19 tests

If you are entering England, Scotland or Northern Ireland from a country or territory classified by the UK Government as **RED**, we will use your personal data to:

- Process your order and payment arrangement for a quarantine facility
- Processing your COVID-19 tests and advising you of the results
- Contacting you or the quarantine facility about your quarantine compliance
- If required, to carry out contact tracing activities
- Where applicable, to enforce the legal requirements to provide accurate information, to quarantine and to take the mandated COVID-19 tests

Your personal data may also be used for reporting purposes to help us determine how well the scheme is performing.

### **Payment Plans**

For individuals who meet specific eligibility criteria, a monthly payment option whereby the cost of the quarantine or testing package is spread over 12 instalments, may be available.

The DHSC will use personal data provided when setting up such a plan to apply the scheme and, in the event of any missed payments, may share this data with contracted debt collection agencies to pursue any money owed.

### **Our lawful basis for processing the personal data**

We must have a lawful basis to process your personal data.

Where we use personal information within the Managed Quarantine Service, the sections of the law that apply are:

- 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
- For enforcement purposes we will rely on the [Health Protection \(Coronavirus, International Travel \(England\)\) Regulations 2020](#) for the power to share personal data, where required

- For arrivals into Scotland, we will rely on the [Health Protection \(Coronavirus\) \(International Travel\) \(Managed Accommodation and Testing\) \(Scotland\) Regulations 2021](#)
- For arrivals into Northern Ireland we will rely on the [Health Protection \(Coronavirus, International Travel\) Regulations \(Northern Ireland\) 2021](#) for the power to share personal data, where required

### Data Processors and other recipients of your data

These are the recipients with whom your personal data may be shared:

Organisation Name	Reason
<b>Corporate Travel Management (CTM)</b>	<ul style="list-style-type: none"> <li>• provision of Corporation Travel Management system and collection of booking data</li> <li>• contracting of hotels for quarantine accommodation packages</li> </ul>
<b>Quarantine Hotel Facility</b>	<ul style="list-style-type: none"> <li>• quarantine hotel provider</li> </ul>
<b>Home Office</b>	<ul style="list-style-type: none"> <li>• collection of PLF data at source</li> <li>• potential enforcement activity</li> </ul>
<b>NHS-Digital</b>	<ul style="list-style-type: none"> <li>• ordering of home test kits for 'Amber' arrivals via standard online process</li> </ul>
<b>Private Testing Labs</b>	<ul style="list-style-type: none"> <li>• processing of COVID-19 lab tests</li> </ul>
<b>G4S</b> <b>Mitie</b>	<ul style="list-style-type: none"> <li>• provision of quarantine hotel security and transport</li> <li>• potential enforcement activity</li> </ul>
<b>Police forces</b>	<ul style="list-style-type: none"> <li>• enforcement activity in relation to potential breaches of the self-isolation and/or quarantine legal requirements</li> </ul>
<b>Qualco</b>	<ul style="list-style-type: none"> <li>• provision of debt-collection when someone enters into a payment plan arrangement and fails to make the agreed repayments</li> </ul>

### International Data Transfers and Storage

None of your personal data will be transferred outside the UK or the European Economic Area (EEA).

### Personal data disposal and retention

We 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. Our retention schedule is regularly reviewed and any 3<sup>rd</sup> parties we use to help us deliver the Managed Quarantine Service are contracted to securely delete any personal data at an agreed point in time.

### Your rights as a data subject

By law, you have a number of rights as a data subject and this does not take away or reduce these rights. Your rights under the UK GDPR (2016/679) and the UK Data Protection Act 2018 applies.

These rights include:

1. **Your right to get copies of your information** – you have the right to ask for a copy of any information about you that is used.
2. **Your right to get your information corrected** – you have the right to ask for any information held about you that you think is inaccurate, to be corrected
3. **Your right to limit how your information is used** – you have the right to ask for any of the information held about you to be restricted, for example, if you think inaccurate information is being used.
4. **Your right to object to your information being used** – you can ask for any information held about you to not be used. However, this is not an absolute right, and we may need to continue using your information, and we will tell you if this is the case.
5. **Your right to get information deleted** – this is not an absolute right, and we may need to continue to use your information, and we will tell you if this is the case.

If you are unhappy or wish to complain about how your personal data is used as part of this programme, you should contact [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk) (England), [DataProtectionOfficer@gov.scot](mailto:DataProtectionOfficer@gov.scot) (Scotland), or [DPO@executiveoffice-ni.gov.uk](mailto:DPO@executiveoffice-ni.gov.uk) (Northern Ireland) in the first instance.

If you are still not satisfied, you can complain to the Information Commissioners Office. Their website address is [www.ico.org.uk](http://www.ico.org.uk) and their postal address is:

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

### **Security**

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. We have written procedures and policies which are regularly audited, and the audits are reviewed at senior level.

### **Data Protection Officer**

The Data Protection Officer for the DHSC is Lee Cramp.

He can be contacted at [data\\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk).

The Data Protection Officer for the Scottish Government is Stuart Gardener

He can be contacted at [DataProtectionOfficer@gov.scot](mailto:DataProtectionOfficer@gov.scot)

The Data Protection Officer for the Executive Office (TEO) is Michael Curran.

He can be contacted at [DPO@executiveoffice-ni.gov.uk](mailto:DPO@executiveoffice-ni.gov.uk)

### **Automated decision making or profiling**

No decision will be made about you solely on the basis of automated decision making (where a

decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### **Changes to our policy**

We keep our privacy notice under regular review, and we will make new versions available on our privacy notice page on our website. This privacy notice was last updated on 24<sup>th</sup> May 2021.