



External Privacy Notice: CORONAVIRUS COVID-19

Introduction

This privacy notice is to make it easier to understand and provide you with more information about how Dorset Police may seek to collect and hold additional information about you in relation to the unprecedented challenges we are all facing during the Coronavirus pandemic (COVID-19).

Dorset Police may seek to collect and process your personal data in response to the recent outbreak of Coronavirus, which is above and beyond what would ordinarily be collected from you, to ensure the safety and well-being of our officers, staff and the general public.

Such information will be limited to what is proportionate and necessary, taking into account of the latest guidance issued by the Government and health professionals, in order to manage and contain the virus. It will enable the Chief Constable to effectively fulfil law enforcement functions to keep people safe.

Where Coronavirus related information is to be used for general reporting or statistics, steps will be taken to anonymise the data and general numbers used, wherever possible.

What personal data is being collected?

Personal data is being collected to enable Dorset Police to identify anyone they come into contact with through their policing tasks who are in any of the high risk categories and would be considered vulnerable and/or infected with Coronavirus.

What is our lawful basis for processing your personal data under GDPR?

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are below:

- Article 6(1)(d) – is necessary in order to protect the vital interests of the data subject or another natural person.

Recital 46 adds that “some processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread”.



- Article 6(1)(e) – 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.

Section 8(c) of the Data Protection Act sets out that such a task must be necessary for the performance of a function conferred on a person by an enactment or rule of law. The Police Reform and Social Responsibility Act 2011 provides that Chief Constable may do anything which is calculated to facilitate or is conducive or incidental to the exercise of the functions Chief Constable.

The processing of special categories of personal data, which includes data concerning a person's health, are prohibited unless specific further conditions can be met. These further relevant conditions are below:

- Article 9(2)(i) – is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.

Schedule 1, Part 2(6) – is necessary for reasons of substantial public interest and for the purpose of a function conferred on a person by an enactment or rule of law; e.g. [Health Protection \(Coronavirus\) Regulations 2020](#) and [Coronavirus Bill 2020](#)

Schedule 1, Part 1(3) – is necessary for reasons of public interest in the area of public health, and is carried out by or under the responsibility of a health professional, or by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law, e.g. [Governmental guidance published by Public Health England](#)

Law Enforcement processing

Dorset Police is a Competant Authority under the Data Protection Act 2018 (DPA 2018) for the processing of personal data for Law Enforcement.

The Law Enforcement purposes are prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and prevention of threats to public security.

As a police force it is necessary to carry out sensitive processing to fulfil the functions of the Chief Constable as both a competent authority and responsible for the policing of Dorset.



What is sensitive processing?

Sensitive processing means the processing of personal data which includes health data;

- Racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership.
- Genetic data, or biometric data.
- Data concerning health.
- Data concerning an individual's sex life or sexual orientation

Section 35(4) and (5) of DPA 2018 requires that sensitive processing for law enforcement purposes is permitted in these two cases;

- a) the data subject has given consent to the processing for the specific purpose **and** at the time the processing is carried out, the controller has an appropriate policy document (APD) in place, **or**
- b) the processing is strictly necessary for a law enforcement purpose, the processing meets at least one condition in Schedule 8 of the Act **and** at the time the processing is carried out, the controller has an APD in place. If either of these two conditions are met, the sensitive processing will be lawful.

What is our lawful basis for processing your personal data for law enforcement reasons under the sensitive processing requirements?

Schedule 8 conditions;

- Condition 1 – Dorset Police dealing with its Statutory policing function
- Condition 3 – Protecting individual's vital interests; and
- Condition 4 – Safeguarding of children and of individuals at risk.

For further information please see the Dorset Police Privacy Notice and Appropriate Policy Document here [Privacy Notice](#)

Am I required to provide my personal data under a statutory requirement, or am I obliged to provide it?

Whilst the provision of data cannot be mandated, you are strongly advised that it is in the best interests of all to provide this information to Dorset Police so we are able to take relevant steps to keep you and others safe.



The information will be managed in confidential manner. All information will be held securely and processed on a 'need to know' basis by only a limited number of people. If there is a need to disclose outside of this, the minimal amount of personal data will be used.

How long will my personal data be retained by Dorset Police?

Dorset Police will only keep your information for as long as it necessary, taking into account of Government advice and the on-going risk presented by Coronavirus.

Health information provided by you in relation to this outbreak of Coronavirus will not be used for any other purpose unless a lawful basis has been identified to retain for law enforcement purposes.

When the information is no longer relevant to hold, it will be securely deleted

Your rights

If you would like to know more about your information rights or how to exercise them, you can go to [Privacy Notice](#)

If you require further information about how we process your personal data, you can contact the Data Protection Team via Telephone 01392 226622

Email dataprotectionalliance@devonandcornwall.pnn.police.uk

In writing to;
Dorset Police
Alliance Data Protection Team
Winfrith
Dorchester
Dorset
DT2 8DZ

Or

Devon and Cornwall Police
Alliance Data Protection Team
Middlemoor
Exeter
Devon
EX2 7HQ

Further advice and guidance from the ICO on this issue can be found:
<https://ico.org.uk/for-organisations/data-protection-and-Coronavirus/>