

# Bedford Borough Council

## The Higgins Bedford – Test and Trace Privacy Statement

### Introduction

The coronavirus (COVID-19) pandemic has led to the introduction of the NHS Test and Trace service. From 19 July 2021 it is recommended that museums collect basic personal data from all visitors over the age of 16, which may be provided to NHS Test and Trace if requested, in order to help stop the spread of COVID-19.

Customers can refuse to provide the data requested as it is voluntary. Find out more about NHS Test and Trace at <https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>.

This Privacy Statement explains in detail the types of personal data we collect and retain about those who visit The Higgins Bedford for the purposes of assisting NHS Test and Trace. It also explains how we will store, handle and keep the data safe. The Privacy Statement covers the collection and use of personal data provided in person by visitors to The Higgins Bedford, which may be shared with NHS Test and Trace.

### Who are The Higgins Bedford?

The Higgins Bedford is an art gallery and museum provided by Bedford Borough Council, forming part of Libraries & Culture services.

For simplicity throughout this statement, 'we' and 'us' means Bedford Borough Council. Bedford Borough Council will be the Data Controller.

### What legal basis do we rely on?

Data protection law provides a number of reasons by which we can collect and process your personal data.

We collect and process your personal data in relation to NHS Test and Trace on the basis of:

- Protecting vital interests – necessary to protect someone's life.
- Public interest – required to perform a public task, in other words to support the NHS Test and Trace service prevent the spread of COVID-19.

### When do we collect your personal data?

When visitors to The Higgins Bedford enter the museum at the beginning of their visit.

### How do we collect your personal data and what sort of data do we collect?

When visitors over the age of 16 do not use the NHS Covid-19 app to scan the NHS QR code, we can collect data using paper forms. The following data may be collected for visitors over the age of 16:

- Name
- Telephone number, or email address if contact number is not available, or postal address if neither telephone number or email address are available
- Date and time of visit

The data is stored in paper format.

## **Why and how do we use your personal data?**

We will share your contact information with NHS Test and Trace, for a period of 21 days from the date of your visit, in response to a request received from NHS Test and Trace. Information that we provide to NHS Test and Trace for this purpose will only be used where necessary to help stop the spread of COVID-19.

## **How do we protect your personal data?**

We know how much data security matters to you. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

- We will ensure that all personal data is stored securely in paper format.
- We will retain your personal data for a limited time.

## **How long will we keep your personal data for?**

Data provided in person by visitors to The Higgins Bedford, for the purposes of NHS Test and Trace, will be retained for 21 days from the date collected and then disposed of securely.

## **Who do we share your personal data with?**

Your personal data will be available to our staff who will identify who visited The Higgins Bedford in a set period, and shared with NHS Test and Trace only in response to a request.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

## **Where your personal data may be processed**

Personal data collected through paper forms for the purposes of NHS Test & Trace will be stored in Great Britain.

## **What are your rights?**

You have a number of rights over your personal data we hold. You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete
- All your data be removed from our systems
- That we restrict or stop using your personal data.

To request any of these rights please talk to a member of staff or complete the online form at:

[Freedom of Information · Bedford Borough Council](#)

To protect your information, we will ask you to prove your identity before proceeding with any request you make. If you have asked a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If we choose not to carry out your request we will explain to you the reasons for our refusal. You have the right to appeal our decision by contacting the Information Commissioner's Office ([www.ico.gov.uk](http://www.ico.gov.uk)).

## **What happens if there is a data breach?**

Bedford Borough Council will record any and all data breaches. Those that meet the requirements set by the Information Commissioner's Office (ICO) will be reported to the ICO within 72 hours of the data breach and all affected individuals will be informed. Find out more at <https://ico.org.uk/for-organisations/report-a-breach/>

## **Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## **Any questions?**

We hope this Privacy Statement has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that have not been covered, please contact:

Information Governance  
Bedford Borough Council  
Borough Hall  
Cauldwell Street  
Bedford MK42 9AP  
Email: [dpo@bedford.gov.uk](mailto:dpo@bedford.gov.uk)  
Telephone: 01234 267422