



Privacy Notice

COVID-19 Wellbeing and Coaching Support Service

When processing your personal data, the council is required under Articles 13 and 14 of the UK General Data Protection Regulation (UKGDPR) to provide you with the information contained in this document.

Data Controller

| | |
|----------------------------|---|
| Name | Cumbria County Council |
| Address | Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD |
| Registration Number | Z5623112 |

You can search the Information Commissioner's Register of Fee Payers at:
<https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

Data Protection Officer

The council's Data Protection Officer is Claire Owen. You can contact the Data Protection Officer by:

Email: dataprotection@cumbria.gov.uk
Post: Cumbria County Council, Legal and Democratic Services, 1st Floor, Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Online: [Contact Form](#)

Purpose

Under Article 5 of the General Data Protection Regulation the council is required to ensure that the data it holds is:

- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, and

- accurate and, where necessary, kept up to date

The Council has had to respond rapidly to working in a new way due to the social distancing required to combat the spread of coronavirus. This has meant that staff have had to adapt quickly to a variety of situations:

- working remotely from home
- redeployment into new roles to support front line staff
- undertaking front line work whilst in fear of contracting the virus

As well as this, all staff are affected personally as they manage their fears and anxiety around themselves, their loved ones and friends contracting the virus, especially those in high risk, vulnerable groups. Staff may also be experiencing emotions relating to bereavement.

The Coaching and Wellbeing Support Service aims to bring together colleagues from a number of geographical and professional areas to support the clinical and wellbeing work of the council's Occupational Health Team

Data Collection

A Network Coordinator will triage data collected from callers who contact the Service using:

- Telephone - 01228 226119
- Email - WellbeingAndCoachingSupport@cumbria.gov.uk

This data is then reviewed by a Cluster Lead and referred to the relevant Cluster Coach - depending on the themes presented during the call and availability of relevant Coaches.

Where a caller presents specific medical issues, is self-isolating for any reason having coronavirus symptoms or has been recently bereaved they will be encouraged to make an Occupational Health Referral via their Line Manager.

If a caller raises concerns about the mental/physical wellbeing of a child the matter will be referred to Cumbria Safeguarding Hub. If the coach is concerned that a staff member feels suicidal or feels like harming themselves or other people then one of the following actions will be taken:

- Call 999
- Advise caller to go to their nearest Accident and Emergency department (A&E).
- Call NHS helpline 111 which provides urgent healthcare advice

Data Types

The following data is required by the Coaching and Wellbeing Support Service to meet legal obligations and to enable officers to reach informed and robust recommendations and decisions:

- name
- address
- contact details – email address, mobile or landline telephone number
- contact preferences

Depending on COVID-19 status we may also collect, store and use the following ‘special categories’ of more sensitive personal information:

- mental health/conditions - including personal thoughts/feelings
- physical health/conditions - including personal thoughts/feelings

Legal Basis for Processing Data

The Coaching and Wellbeing Support Service relies on the processing of your personal data (such as name, age, address), and to do this we rely on the following legal bases:

- **UKGDPR Article 6(1) (c) Legal Obligation**
- **UKGDPR Article 6(1) (e) Public Task/Public Interest/Official Authority**

Where the council is relying on UKGDPR Article 6(1)(c) all [Relevant Legislation](#) is listed below.

Depending on COVID-19 status the Service also relies on the processing of more sensitive ‘special categories of personal data’ (such as health, race, ethnicity, sexual orientation) and to do this we rely on the following legal bases:

- **UKGDPR Article 9(2) (i) Public health**

Relevant Legislation

These legal bases above are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities, including:

- [Regulation 3\(4\) Health Service \(Control of Patient Information\) Regulations 2002](#)

Automated Decision-Making/Profiling

We do not use your information for automated decision-making or profiling purposes.

Data Transfers

Your personal data is not transferred to a third country or international organisation.

Redaction

We operate a policy where we routinely redact the following details before making forms and documents available online:

- contact details e.g. telephone numbers, email addresses
- signatures
- personal or special category data
- information agreed to be confidential or commercially sensitive

Occasionally it may be considered necessary, justified and lawful to disclose data that appears in the list above. In these circumstances the council will make all reasonable efforts to contact you if this processing is going to have an impact on your rights or privacy.

Data Sharing

Data provided via contact with the Employee Coaching and Wellbeing Service will only be shared with:

- Organisational Development and Workforce Training Team
- Cluster Coaches

During the course of the COVID-19 emergency your data may need to be shared with other public bodies or organisations. All reasonable efforts will be made to contact you if this processing is going to have an impact on rights or privacy.

Data Security and Retention

All of the information you give us will be kept safe and secure whether it is written or on a computer system. We will treat any personal information confidentially and will comply with the UKGDPR/Data Protection Act 2018. This means that, if we keep any of your personal data we must:

- tell you what information we need to collect from you
- only use the information for the reason we have agreed with you
- not ask for more information than we need to provide the services
- let you see any information we have collected about you, on request
- keep the information safe, secure and confidential
- personal information will be deleted in accordance with council policy

The information you supply will be kept on a secure council system and can only be accessed by authorised employees.

Cumbria County Council will only store your information for as long as is legally required in accordance with the council's Retention and Disposal Schedule or in situations where there is no legal retention period established best practice will be followed.

Your Rights - Data Subject Access

The UKGDPR provides you with the right to access information the council, as a public authority holds about you. Upon receipt of a valid request the council will:

- provide you with a response within one month

- let you know if your request is subject to an extension
- make reasonable efforts to comply with the format of your request
- inform you if your request is going to be refused or a charge is payable.

You can make a Data Subject Access Request by contacting:

Email: information.governance@cumbria.gov.uk
Post: Cumbria County Council, Information Governance Team
Parkhouse, Baron Way, Carlisle CA6 4SJ
Telephone: (01228) 221234
Online: [Contact Form](#)

Your Rights - Other

In addition to your right of access the UKGDPR also gives you the following rights:

- the right to be informed via the council's Privacy Notice
- the right to withdraw your consent. If we are relying on your consent to process your data then you can remove this at any point
- the right of rectification, we must correct inaccurate or incomplete data within one month
- the right to erasure. You have the right to have your personal data erased and to prevent processing unless we have a legal obligation to process your personal information
- the right to restrict processing. You have the right to suppress processing. We can retain just enough information about you to ensure that the restriction is respected in future
- the right to data portability. We can provide you with your personal data in a structured, commonly used, machine readable form when asked
- the right to object. You can object to your personal data being used for profiling, direct marketing or research purposes
- you have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Unless otherwise stated above you can exercise any of these rights by contacting:

Email: dataprotection@cumbria.gov.uk

Post: Cumbria County Council, Legal and Democratic Services, 1st Floor,
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Online: [Contact Form](#)

Verifying Your Identity

When exercising the rights mentioned above please be aware that under UKGDPR Article 12(6) additional information can be requested to verify that you are the data subject if your identity is unconfirmed. Please note that:

- additional documentation is only required when the council cannot verify your identity using internal council systems that relate to the service you are requesting information about
- the council will contact you for this documentation prior to processing your request
- the statutory deadline for responding to your request will start when you have provided the additional documentation
- failure to provide additional documentation may lead to the council rejecting your request.

Complaints

If you have any concerns about the information contained in this Privacy Notice please contact: WellbeingAndCoachingSupport@cumbria.gov.uk.

If you have concerns about the way the council has processed your data, please contact the council's Data Protection Officer via:

Email: dataprotection@cumbria.gov.uk
Post: Cumbria County Council, Legal and Democratic Services, 1st Floor,
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Online: [Contact Form](#)

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>