

Privacy Notice

How we process your personal data related to coronavirus (COVID-19) public health epidemic

Who we are

The Independent Office for Police Conduct (“IOPC”)¹ was established to oversee the police complaints system in England and Wales and maintain public confidence in it.²

For further information on what we do, and for details about how to contact us, please visit our website.

Why we process information about you

The IOPC is committed to respecting and protecting your privacy. This notice is intended to be an addendum to our other privacy notices on core business and human resources. These can be found at: [Privacy information | Independent Office for Police Conduct](#)

This privacy notice is to explain how and for what purpose/s the IOPC will collect and process any personal information about you (including special category data) related to the coronavirus (COVID-19) public health epidemic.

The purpose for which we are processing your personal data is to manage the IOPC’s response to the coronavirus (COVID-19) public health epidemic. The IOPC collects and retains personal data that is relevant to assessing risk connected to COVID-19- for their employees and anyone who may have been exposed to a COVID-19 related risk via contact with the IOPC staff members.

We will collect and retain personal data in the following situations:

- 1) IOPC Employees – COVID-19 risk assessments
 - a. The IOPC already undertakes risk assessments in accordance with health and safety law for all staff. The IOPC has undertaken to carry out additional health and safety assessments for employees who maybe at heightened risk or which may increase risk of exposure to COVID-19. This may be due to deployment, additional risks the staff member may have due to their vulnerabilities or any

¹ Formerly the Independent Police Complaints Commission. The IOPC was established on 8th January 2018.

² We also oversee the complaints system for other organisations, such as HMRC, the National Crime Agency, and the Gangmasters and Labour Abuse Authority.

other reason which may increase

- b. The IOPC collects personal data for these additional risk assessment tool to assess and analysis the risks posed from COVID-19-19 and to minimise these risks. The model assesses overall risk based on the employee's individual and personal circumstances. This will include special category data such as age, ethnicity, sex and health data. The risk assessment tool will then enable the IOPC to make recommendations about the employees's working environment, whether they should be deployed and any other recommendation to minimise risks (e.g., providing personal protective equipment or providing equipment to work remotely etc).
- c. All IOPC employees can take the COVID-19 self-risk assessment to evaluate their own risks. This is not compulsory for all staff.

2) IOPC employees – attending offices – booking form

- a. The IOPC collects and retains data of IOPC employees attending the IOPC offices. Amongst other uses this data is used to assess and mitigate against any risk of exposure to CCOVID-19-. This includes collection of personal data of contractors, secondees, temporary employees, apprentices, students etc
- b. Access to the offices will be limited and anyone seeking to access the office must complete a booking form. This will collect personal data including their name and a personal contact number which may be passed to a public body as outlined below.

3) Visitors to the IOPC offices

- a. The IOPC collects and retains data of any person visiting the IOPC offices in order to mitigate against any risk of potential contact with CCOVID-19-.
- b. IOPC employees will make the arrangements for visitors attending the office to send their personal details as above on the booking form. This will include their name and their contact number. This personal data maybe passed on to public bodies as outlined below.

The kind of personal information we collect and process

Personal data

The personal data we collect and process about you may include, but is not limited to: name, address, other contact details (e.g. email and telephone numbers), sex, job title, location data or online identifier

Special category data

Certain categories of personal data have additional legal protections when being processed. These categories are data about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, or

data concerning your sex life or sexual orientation.

The special category data we collect and process about you may include, but is not limited to: health information, your race or ethnic origin and your sex assigned at birth. These are collected to assess risk, identify COVID-19- cases and mitigate against risks of transmission.

Where possible we will anonymise your data. Under exceptional circumstances the IOPC will disclose your personal data to third parties where we are legally obliged to do so or where it is necessary in the public interest. The person whose personal data is processed will be informed. Their consent will not be required as this will only happen in exceptional circumstances to protect life, minimise risk from COVID-19- and to prevent entire offices closing.

Our legal basis for processing your data

The legal bases for processing your personal data are:

- it is necessary for the performance of a task carried out in the public interest
 - UK Health Security Agency are carrying out a public task in that they are running a track and trace system that is for the benefit of public health. They are trying to reduce the spread of a dangerous virus in order to help protect the vulnerable and to be able to manage the health care provided by the NHS to ensure that it is not over-whelmed and that the general health of the public is protected as far as possible by identifying those people in contact with the virus and so asking them to isolate, therefore trying to “flatten the curve” of case numbers .
 - Collection and sharing of personal data is necessary to protect its employees and ensure that the IOPC can continue to function and meet its statutory duties in accordance with their statutory function laid out in the Police Reform Act 2002.

Our legal basis for processing any special category data is:

Article 9 GDPR:

- Condition (i) – the sharing is necessary for reasons of public interest in the area of public health to protect and minimise risks from COVID-19 and to protect the NHS by minimising those exposed to COVID-19.

Who we share your data with

The personal data captured within IOPC employee COVID-19 risk assessments will only be accessed by those who are required to risk assess the person. This may include their line manager, HR and facilities.

The IOPC may need to pass the details of those people who have accessed our offices, to the relevant public bodies, and the equivalent bodies in Wales, to prevent an outbreak of

COVID-19. The public bodies include, but are not limited to, UK Health Security Agency, NHS track and trace and Local authority health protection teams.

We will only collect, use and disclose the data collected in this form to the relevant public body for the purpose of tracking and tracing people who may have come into contact with a positive COVID-19 case at our offices.

How long we will keep your data

We will retain personal data collected in accordance with the [retention and disposal schedule](#).

Your rights in relation to the data we hold

Data protection legislation provides you with a number of rights relating to your personal data. These rights are subject to some specific exemptions. Your rights may include:

- the right to access your data
- the right to have your data corrected if it is wrong or incomplete
- the right to request restrictions to the processing of your data
- the right to object to your data being processed
- the right to have your data erased
- the right to be informed about how your data is processed
- rights relating to automated decision making and data portability

You should keep us informed of any changes to your information so that we can be confident that the data we hold about you is accurate.

To understand more about these rights are and how to exercise them please see [our website](#).

Our Data Controller and Data Protection Officer

Our data controller is the Director General. The data controller has overall control over the purpose for which and the manner in which we obtain and process personal data.

The IOPC has a designated Data Protection Officer and a Freedom of Information and Data Protection Team. If you have any queries or concerns about exercising your data rights or the way in which we collect, handle or process your data, please contact the team either via the contact us page of our website or by emailing dpo1@policeconduct.gov.uk.

Alternatively, you can contact our switchboard on 0300 020 0096 between 9am and 5pm, Monday to Friday.

Your right to complain to the Information Commissioner

If you are unhappy with any aspect of the way in which we have processed your personal data, you have the right to make a complaint to the Information Commissioner's Office:

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

www.ico.org.uk
Tel: 0303 123 1113
casework@ico.org.uk

Feedback or complaints about our service or staff

If you want to give us feedback or make a complaint about our service or staff please contact our Complaints and Feedback Team either through the [contact us page of our website](#) or by emailing Feedback@policeconduct.gov.uk

Alternatively, you can contact our switchboard on 0300 020 0096 between 9am and 5pm, Monday to Friday or leave a voicemail message at any time on 0207 166 3261.

Review of this notice

This privacy notice will be regularly reviewed and may be revised. Please visit our website [here](#) to check for any updates.