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**PRIVACY NOTICE**

**Our legal basis for processing your data**

Processing is for the direct patient care and GP practices must establish both a lawful basis for processing and a special category condition for processing to comply with the General Data Protection Regulation (GDPR).

The lawful basis for processing is Article 6(1)(e) “necessary in the exercise of official authority vested in the controller” and the special category condition is Article 9(2)(h) “necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services”.

Where disclosures are a legal requirement the lawful basis and special category condition for processing are: Article 6(1)(c) “… for compliance with a legal obligation …” and Article 9(2)(h) “…management of health or social care systems…”

For "performance of a task carried out in the public interest" (Article 6(1)(e) and Article 9(2)(j) "research purposes", the practice will always gain your consent before releasing information.

**How we use your personal information**

Healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received, for example NHS Trusts, GP Surgeries, Walk-in-Centres etc. These records are used to help to provide you with the best possible healthcare.

NHS healthcare records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records this GP Practice hold about you may include the following information:

* Details about you, such as your name, address, date of birth, carers, legal representatives and emergency contact details.
* Any contact the surgery has with you, such as appointments, visits, telephone calls etc.
* Notes and reports about your health.
* Details about your treatment and care.
* Results of investigations such as laboratory tests, x-rays etc.
* Relevant information from other health professionals, relatives or those who care for you.

**Coronavirus (COVID-19) pandemic and your information**The ICO recognises the unprecedented challenges the NHS and other health professionals are facing during the COVID-19 pandemic.

* The ICO also recognise that 'Public bodies may require additional collection and sharing of personal data to protect against serious threats to public health.'The Government have also taken action in respect of this and on 20th March 2020 the Secretary of State for Health and Social Care issued a notice under Regulation 3(4) of the Health Service (Control of Patient Information) Regulations 2002 requiring organisations such as GP Practices to use your information to help GP Practices and other healthcare organisations to respond to and deal with the COVID-19 pandemic.Please note that this notice has now been revised and extended by a further notice until 30 September 2021.
* In order to look after your healthcare needs during this difficult time, we may urgently need to share your personal information, including medical records, with clinical and non clinical staff who belong to organisations that are permitted to use your information and need to use it to help deal with the COVID-19 pandemic. This could (amongst other measures) consist of either treating you or a member of your family and enable us and other healthcare organisations to monitor the disease, assess risk and manage the spread of the disease. Additionally, the use of your information is now required to support NHS Test and Trace.
* Please be assured that we will only share information and health data that is ***necessary*** to meet yours and public healthcare needs.

The Secretary of State for Health and Social Care has also stated that these measures are temporary and will expire on 30th September 2021 unless a further extension is required. Any further extension will be provided in writing and we will communicate the same to you.

* Please also note that the data protection and electronic communication laws do not stop us from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.
* It may also be necessary, where the latest technology allows us to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.If you are concerned about how your information is being used, please contact our DPO using the contact details provided in this Privacy Notice.

**How we look after your personal information during the COVID19 pandemic when staff may need to work from home**

In accordance with government guidance and in order to protect the health and safety of our staff during this difficult period we will be requiring some staff to work from home. This means that staff may have access to any necessary personal and/or medical information in order to look after your healthcare needs.

We would like to assure you that our staff will be subject to all relevant security procedures and policies of the Practice to ensure that any information is kept safe, secure and confidential at all times.

If you have any concerns about how your information may be used please contact our Data Protection Officer who will be happy to assist with your enquiry.

**Changes the Government has made as a result of COVID19**

The health and social care system is facing significant pressures due to the coronavirus outbreak. Health and care information is essential to deliver care to individuals to support health and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the outbreak. In the current emergency it has become even more important to share health and care information across relevant organisations. This addendum to the practice’s privacy notice explains what actions we have taken in more detail

<https://digital.nhs.uk/services/summary-care-records-scr/scr-coronavirus-covid-19-supplementary-privacy-notice>

A further addendum is attached to this Privacy Notice in respect of Pandemic Planning and Research (COVID 19). This is a Transparency Notice from NHS Digital.

**Risk Stratification**

Risk stratification data tools are increasingly being used in the NHS to help determine a person’s risk of suffering a particular condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from a number of sources including NHS Trusts and from this GP Practice. A risk score is then arrived at through an analysis of your de-identified information using software, and is only provided back to your GP as data controller in an identifiable form. Risk stratification enables your GP to focus on preventing ill health and not just the treatment of sickness. If necessary your GP may be able to offer you additional services. Please note that you have the right to opt out of your data being used in this way.

**Medicine Management**

The Practice may conduct Medicines Management Reviews of medications prescribed to its patients. This service performs a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost effective treatments. This service is provided to practices within North Yorkshire through NHS Vale of York CCG.

**Disclosures which are required by law or clinical audit requirements**

In order to comply with its legal obligations this practice may send data to NHS Digital when directed by the Secretary of State for Health under the Health and Social Care Act 2012 and the practice contributes to national clinical audits and will send the data which are required by NHS Digital when the law allows. This may include demographic data, such as date of birth and information about your health which is recorded in coded form.

**Disclosures for medical research or health management purposes**

The surgery will always gain your consent before releasing the information for this purpose, the practice contributes to medical research and may send relevant information to medical research databases when consent is obtained and the law allows.

**How do we maintain the confidentiality of your records?**

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

* EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR)
* Human Rights Act 1998
* Common Law Duty of Confidentiality
* Health and Social Care Act 2012
* NHS Codes of Confidentiality, Information Security and Records Management
* Information: To Share or Not to Share Review

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (eg life or death situations), where the law requires information to be passed on and/or in accordance with the information sharing principle following Dame Fiona Caldicott’s information sharing review (Information to share or not to share) where “The duty to share information can be as important as the duty to protect patient confidentiality”. This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles. They should be supported by the policies of their employers, regulators and professional bodies.

**Who are our partner organisations?**

We may also have to share information, subject to strict agreements on how it will be used, with the following organisations:

* NHS Trusts/Foundation Trusts
* GPs
* NHS Commissioning Support Units
* Independent Contractors such as dentists, opticians, pharmacists
* Private Sector Providers
* Voluntary Sector Providers
* Ambulance Trusts
* Clinical Commissioning Groups
* Social Care Services
* NHS Digital
* Local Authorities
* Education Services
* Fire and Rescue Services
* Police & Judicial Services
* Other “data processors” which you will be informed of

You will be informed who your data will be shared with and in some cases asked for explicit consent for this to happen when required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure.

**Your rights in relation to your data**

* Right to Access – please see the “access to personal information” section below.
* Right of rectification – right for individuals to have inaccurate personal data rectified.
* Right to object – you have the right to object to the processing of your data at any time.

**Access to personal information**

You have a right under General Data Protection Regulation to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. This is known as “subject access request” (SAR) and in order to request this you need to do the following:

* Your request can be made verbally or in writing to the GP Practice – for information from the hospital or other healthcare provider you should write direct to them.
* No charge will be made to provide the information.
* We are required to respond to you within 30 days of receipt of request.
* You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified and your records located.

**How long data will be retained**

We will hold, protect and maintain your data for as long as the patient/doctor relationship is in place, this will either be until your death or if you decide to move to another GP practice, if you do move your data will follow you.

**Cookies**

Cookies allow websites to, amongst other things, remember if you have logged in or not, remember your preferences and tailor your experience of the website.
We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to meet our customers’ needs and expectations.
You can choose to decline or accept cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer; however, this may prevent you from taking full advantage of the functionality of a website.

**Change of Details**

It is important that you inform us if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date.

**Notification**

GDPR requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.

The information is publicly available on the Information Commissioners Office website [www.ico.org.uk](http://www.ico.org.uk).

This Practice is registered with the Information Commissioners Office (ICO).

**Primary Care Network**

We are a member of three Primary Care Networks – NIMBUS PCN and WoNE PCN in York and NEXUS PCN in Hull.

This means we will be working closely with a number of other Practices and health and care organisations to provide healthcare services to you.

During the course of our work we may share your information with these Practices and health care organisations/professionals.  We will only share this information where it relates to your direct healthcare needs.

When we do this, we will always ensure that appropriate agreements are in place to protect your information and keep it safe and secure. This is also what the Law requires us to do.

If you would like to see the information the PCN holds about you please contact the data protection officer contact details shown below.

**Who is the Data Controller?**

The Data Controller, responsible for keeping your information secure and confidential is:

* Haxby Group

**Objections/Complaints**

If you are happy for your data to be extracted and used for the purposes described in this privacy notice then you do not need to do anything. If you have any concerns about how your data is shared or information managed then please contact the Data Protection Officer at the following addresses:

**York Patients** – please contact:

Julie Lund, Data Protection Officer, Haxby Group Practice, Haxby & Wigginton Health Centre, The Village, Wigginton, York YO32 2LL.

**Hull Patients** – please contact:

Barry Jackson, Head of Information Governance, The View, Bridgehead Business Park, HU13 0GD,

If you are still unhappy following a review by the Practice, you can then complain to the Information Commissioners Office (ICO) [www.ico.gov.uk](http://www.ico.gov.uk), telephone 0303 123 1113 (local rate) or 01625 545 745.

**General Practice Transparency Notice for GPES Data for Pandemic Planning and Research (COVID-19)**

This practice is supporting vital coronavirus (COVID-19) planning and research by sharing your data with NHS Digital.

The health and social care system is facing significant pressures due to the coronavirus (COVID-19) outbreak. Health and care information is essential to deliver care to individuals, to support health, social care and other public services and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the coronavirus outbreak. In the current emergency it has become even more important to share health and care information across relevant organisations. This practice is supporting vital coronavirus planning and research by sharing your data with NHS Digital, the national safe haven for health and social care data in England.

**Our legal basis for sharing data with NHS Digital**

NHS Digital has been legally directed to collect and analyse patient data from all GP practices in England to support the coronavirus response for the duration of the outbreak. NHS Digital will become the controller under the General Data Protection Regulation 2016 (GDPR) of the personal data collected and analysed jointly with the Secretary of State for Health and Social Care, who has directed NHS Digital to collect and analyse this data under the [COVID-19 Public Health Directions 2020](https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/secretary-of-state-directions/covid-19-public-health-directions-2020) (COVID-19 Direction).

All GP practices in England are legally required to share data with NHS Digital for this purpose under the Health and Social Care Act 2012 (2012 Act). More information about this requirement is contained in the [data provision notice issued by NHS Digital to GP practices](https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notices/data-provision-notices-dpns/gpes-data-for-pandemic-planning-and-research).

Under GDPR our legal basis for sharing this personal data with NHS Digital is Article 6(1)(c) - legal obligation. Our legal basis for sharing personal data relating to health, is Article 9(2)(g) – substantial public interest, for the purposes of NHS Digital exercising its statutory functions under the COVID-19 Direction.

**The type of personal data we are sharing with NHS Digital**

The data being shared with NHS Digital will include information about patients who are currently registered with a GP practice or who have a date of death on or after 1 November 2019 whose record contains coded information relevant to coronavirus planning and research. The data contains NHS Number, postcode, address, surname, forename, sex, ethnicity, date of birth and date of death for those patients. It will also include coded health data which is held in your GP record such as details of:

* diagnoses and findings
* medications and other prescribed items
* investigations, tests and results
* treatments and outcomes
* vaccinations and immunisations

**How NHS Digital will use and share your data**

NHS Digital will analyse the data they collect and securely and lawfully share data with other appropriate organisations, including health and care organisations, bodies engaged in disease surveillance and research organisations for coronavirus response purposes only. These purposes include protecting public health, planning and providing health, social care and public services, identifying coronavirus trends and risks to public health, monitoring and managing the outbreak and carrying out of vital coronavirus research and clinical trials. The British Medical Association, the Royal College of General Practitioners and the National Data Guardian are all supportive of this initiative.

NHS Digital has various legal powers to share data for purposes relating to the coronavirus response. It is also required to share data in certain circumstances set out in the COVID-19 Direction and to share [confidential patient information to support the response under a legal notice](https://digital.nhs.uk/coronavirus/coronavirus-covid-19-response-information-governance-hub/control-of-patient-information-copi-notice) issued to it by the Secretary of State under the Health Service (Control of Patient Information) Regulations 2002 (COPI Regulations).

[Legal notices](https://www.gov.uk/government/publications/coronavirus-covid-19-notification-of-data-controllers-to-share-information) under the COPI Regulations have also been issued to other health and social care organisations requiring those organisations to process and share confidential patient information to respond to the coronavirus outbreak. Any information used or shared during the outbreak under these legal notices or the COPI Regulations will be limited to the period of the outbreak unless there is another legal basis for organisations to continue to use the information.

Data which is shared by NHS Digital will be subject to robust rules relating to privacy, security and confidentiality and only the minimum amount of data necessary to achieve the coronavirus purpose will be shared. Organisations using your data will also need to have a clear legal basis to do so and will enter into a data sharing agreement with NHS Digital. Information about the data that NHS Digital shares, including who with and for what purpose will be published in the NHS Digital [data release register](https://digital.nhs.uk/services/data-access-request-service-dars/register-of-approved-data-releases).

For more information about how NHS Digital will use your data please see the [NHS Digital Transparency Notice for GP Data for Pandemic Planning and Research (COVID-19)](https://digital.nhs.uk/coronavirus/gpes-data-for-pandemic-planning-and-research/transparency-notice-gpes-data-for-pandemic-planning-and-research-covid-19).

**National Data Opt-Out**

The application of the [National Data Opt-Out](https://www.nhs.uk/your-nhs-data-matters/) to information shared by NHS Digital will be considered on a case by case basis and may or may not apply depending on the specific purposes for which the data is to be used. This is because during this period of emergency, the National Data Opt-Out will not generally apply where data is used to support the coronavirus outbreak, due to the public interest and legal requirements to share information.

**Your rights over your personal data**

To read more about the health and care information NHS Digital collects, its legal basis for collecting this information and what choices and rights you have in relation to the processing by NHS Digital of your personal data, see:

* the [NHS Digital GPES Data for Pandemic Planning and Research (COVID-19) Transparency Notice](https://digital.nhs.uk/coronavirus/gpes-data-for-pandemic-planning-and-research/transparency-notice-gpes-data-for-pandemic-planning-and-research-covid-19)
* the [NHS Digital Coronavirus (COVID-19) Response Transparency Notice](https://digital.nhs.uk/coronavirus/coronavirus-covid-19-response-information-governance-hub/coronavirus-covid-19-response-transparency-notice)
* the [NHS Digital General Transparency Notice](https://digital.nhs.uk/about-nhs-digital/our-work/keeping-patient-data-safe/gdpr/gdpr-register)
* [how NHS Digital looks after your health and care information](https://digital.nhs.uk/about-nhs-digital/our-work/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information)

The active links within this notice can be accessed at:

<https://digital.nhs.uk/coronavirus/gpes-data-for-pandemic-planning-and-research/general-practice-transparency-notice>?

**Privacy notice for the COVID-19 Clinical Risk Assessment Tool**

**16 February 2021**

1. **Title of service: COVID-19 Clinical Risk Assessment Tool**
2. **Contact details**

|  |  |
| --- | --- |
| **Name and contact details of Controller** | **Haxby Group Practice, York** |
| **Contact details of our Data Protection Officer**  | Julie Lund, DPO, Haxby Group Practice, Haxby and Wigginton Health Centre, Wigginton, York YO32 2LL |
| **Name and contact details of Controller** | **Haxby Group Practice, Hull** |
| **Contact details of our Data Protection Officer**  | Barry Jackson, N3i**Head of Information Governance**The View, Bridgehead Business Park, HU13 0GD |

1. **Our purposes for processing your personal information**

This COVID-19 Clinical Risk Assessment Tool Privacy Notice is provided to explain how your personal information is used when we use the COVID-19 Clinical Risk Assessment Tool (the Tool). This notice is an additional notice to our full privacy notice which explains how we process your personal information more generally and is available on request and on our website.

The Tool is an online tool, provided by the NHS, that assesses the risk to you of coronavirus. It has been designed for use during a consultation with a patient and otherwise to support direct patient care. Your doctor or healthcare professional (clinician) inputs information about you into the Tool, to generate individual risk assessment results for you (see section 4 below which describes how this works).

Using information provided by you or obtained by your clinician, for example your weight and information from your health record, your clinician answers the questions in the Tool. The Tool will then generate risk assessment results based on this information. The results will give you or your clinician a better understanding of your risks of infection and potential consequences for you of infection from coronavirus. Your clinician may discuss the result with you to give you personalised health advice.

In addition to using the Tool to support the individual care of our patients, we will be providing information about your experience to NHS Digital, which provides the Tool. Anonymous data collected through the Tool will also help NHS Digital and the University of Oxford, who developed the QCovid® model used in the Tool, to develop and improve the Tool.

The Tool is registered as a medical device with the Medicines and Healthcare Products Regulatory Agency (MHRA).

1. **What is the Tool and how does it work?**

Your clinician will enter information into the Tool about you, your health and the medicines you take. Some of this information will be taken from your health record but your clinician may also need to ask you some questions about you and your health. They may also need to measure your height and weight to work out your body mass index (BMI).

The Tool will generate results for absolute risk and relative risk (see below), estimating how likely it is that you will:

* catch coronavirus and go to hospital
* catch coronavirus and die

All of the information used to answer the questions in the Tool is required because it has been identified as a factor which is relevant to the risk of catching and being hospitalised or dying from coronavirus.

The Tool has been developed from research by the University of Oxford about how people have been affected by coronavirus. The Tool uses a model called QCovid® which was developed based on information about people who had coronavirus in early 2020. The University of Oxford looked at data about people who went to hospital or died as a result of coronavirus during the first wave of the pandemic and combined it with data from hospital records and GP surgeries.

To develop the QCovid® model used by the Tool, the University of Oxford analysed this data to find out if certain things impact how coronavirus affects people. Researchers found that some things make it more likely that a person will need to go to hospital or die from coronavirus – these are called ‘risk factors’.

Risk factors that were identified as important included: age; body mass index (BMI); ethnicity; certain health conditions and where people live. The University developed a model which weighted each of these factors and this is used within the Tool to generate risk assessment results from the information entered about you by the clinician. The results may support a discussion between you and your clinician about what your level of risk means for you or otherwise used by your clinician for your healthcare.

The Tool will estimate your ‘absolute risk’ and ‘relative risk’.

‘Absolute risk’ is the risk of catching and being hospitalised or dying from coronavirus. This is based on data from the first wave, alongside a second time period (May-June 2020). For example, an absolute risk of 1% (or 1 in 100), would mean that we would expect 1 person to be hospitalised or die with the same characteristics and 99 to not be hospitalised or die.

‘Relative risk’ is the risk of catching and being hospitalised from coronavirus based on your information and risk factors compared with a person of the same age and sex, but no other risk factors. For example, a relative risk of 2 would mean that we would expect you to be twice as likely to catch and be hospitalised or die from coronavirus than somebody of the same age and sex with no other risk factors.

The risks factors used to develop the QCovid® model used in the Tool, are based on data collected in the first few months of the pandemic in 2020. These risks are changing over time in line with infection rates, social distancing measures and individual behaviour. It is based on data collected between February and April 2020, at a time when different measures were in place for shielding and social distancing and different national restrictions were in place. This means that, although risk assessment results are generated for you using the Tool, your clinician will consider these alongside shielding, social distancing and local or national restrictions, which may be different from when the QCovid® model was developed.

Because we don’t yet have enough research about some groups of people, risk assessment results may not be accurate for:

* People aged under 19 and over 100, because the research was done on adults aged from 19 to 100 and because very few children became seriously ill with coronavirus.
* People who are trans or intersex, because the research was done using information about the sex people were registered with at birth
* People who are pregnant, because only small numbers of pregnant people were included in the research so we cannot be confident about their level of risk.
* People who were asked to shield during the first wave because, when the research was done, many of these people were shielding at home and so were less likely to catch coronavirus. This means the Tool may underestimate the risk for these people.

Your clinician will explain more about these limitations when they tell you what your risk assessment means for you. Risk assessment results will not be used in isolation to remove anyone from the Shielded Patient List (SPL). However, your clinician may use the Tool as part of their assessment of whether you should be placed on the SPL.

Researchers are continuing to learn more about coronavirus as more information becomes available. The QCovid® model used in the Tool will change and be updated over time as more information becomes available. The online service will be updated to reflect changes to the model.

1. **Our legal basis to process your personal information**

Your clinician is processing your personal data in order to answer the questions in the Tool and to record the risk score in your health record. This is to provide you with safe care and treatment**.**

Under the UK General Data Protection Regulations (UKGDPR) we are allowed to process your personal information using the Tool for the purposes of providing you with healthcare services. This is called “Public Task” under the UKGDPR and is allowed under Article 6(1)(e).

We are also processing personal information about your ethnicity and health conditions to use the Tool. This is also for a healthcare purpose and this is allowed under Article 9(2)(h) of the UKGDPR and under Schedule 1 of Paragraph 2 of the Data Protection Act 2018.

1. **Categories of personal information we process when using the Tool**

Your clinician will input the following about you into the Tool using information you have provided or taken from your health record:

* Age (19-100)
* Sex registered at birth
* Ethnic group
* Living arrangements (whether you live in your own home, in a care home or are homeless)
* Postcode (to identify a Townsend deprivation score, a well-known way of measuring deprivation based on data from the 2011 Census). Your postcode is deleted from the Tool once the Townsend score is created.
* Health information, including
* Height (cm), Weight (Kg) – used to calculate BMI
* Cardiovascular diseases
* Respiratory diseases and treatment
* Metabolic, renal and liver conditions
* Neurological and psychiatric conditions
* Autoimmune and haematological conditions
* Cancer and Immunosuppressants– If you have a diagnosis of certain cancers and you have been prescribed if you have been prescribed 4 or more times with certain immunosuppressants in the last 6 months.

The Tool takes the answers we have provided to the questions above and generates a risk assessment result which will allow your clinician to provide personalised advice to you about your risk and otherwise for your healthcare.

1. **Who we share your information with**

We do not include any personal information that would identify you when we are answering the questions in the Tool.

The only information which could be used to potentially identify you is your postcode. For most people, postcode alone would not identify them because usually a number of different people live within a postcode area. However, just in case you are the only person who lives at your postcode, the Tool immediately converts your postcode to a number which relates to a [Townsend deprivation score](https://www.statistics.digitalresources.jisc.ac.uk/dataset/2011-uk-townsend-deprivation-scores), a well-known way of measuring deprivation based on data from the 2011 Census. This number, which cannot identify you, is used by the Tool to generate risk assessment results and your postcode is then deleted from the Tool.

Anonymous data, which is the information provided to answer the questions in the Tool and which cannot identify you, will be collected by NHS Digital who provide the Tool. This anonymous data may be shared with the University of Oxford and the Department of Health and Social Care to help develop and improve the Tool and the QCovid® model developed by the University which is used in the Tool.

1. **More information**

For more information about:

* how long we keep your personal information for
* where we store your personal information
* your rights and choices in relation to how we process your personal information
* how to contact us; and
* how to complain to the Information Commissioner if you are unhappy about the way we are processing your personal information

please see our full Privacy Notice which is available on our website or on request.

1. **Changes to this privacy notice**

This privacy notice may change from time to time and the latest version number and date will be shown at the top and on the version published on our website so you know when it was last updated.