

and health are different policy objectives and the merging of policy responses to these two distinct areas will ultimately undermine the public's trust in the healthcare system by putting our right to privacy at risk.

23. Liberty urges the Government to reconsider whether contracting with such companies is in the best national interest. It is also essential that a data collection activity of this magnitude is subject to rigorous Parliamentary scrutiny before any company is contracted to deliver it.

24. If such a system is to be used, then it must:

- Process personal data only when strictly necessary and proportionate, with rigorous retention and deletion policies, full transparency, and consultation with the public and Parliament prior to them going live.
- Be transparent, with Data Protection Impact Assessment (DPIAs) made available for scrutiny.
- Be non-discriminatory – particularly relevant when using crude profiling for data analysis and predications.²⁰
- Be time limited to the public health crisis, and not duplicated and sold to other government departments for use in other contexts (including law and immigration enforcement).

MIGRANTS' RIGHTS

25. Liberty is particularly concerned by the impact of Covid-19 and the Government's response to it on migrants of all statuses. People subject to immigration control are facing destitution, unsafe working conditions, eviction, exclusion from healthcare and even death because of the Government's inadequate response to Covid-19. The health of the wider public is being put at risk because the Government has so far failed to properly protect migrants from Covid-19.

²⁰ The Government must be mindful of how the use of our personal data to track and monitor us, make predictions about our lives and determine access to services was already deeply embedded into our society prior to the pandemic, entrenching existing socio-economic inequalities (see, for example, use of 'predictive policing' in law enforcement).²⁰ These models of data surveillance lead to discriminatory outcomes, often shielded from interrogation by the 'black box' of indecipherably complex technology.