

## Supporting Government track and trace – customer registration for hospitality businesses (England)

### Core Principles

- The Government is asking consumers, the general public and hospitality and tourism businesses to help it in the efforts to stamp out further COVID infections and localised outbreaks by providing basic information to be used as part of its contact tracing regime
- Although this will require additional efforts and activity on the part of managers and staff, it is a crucial part of ensuring that you can continue to trade in the event of a spike in infections following reopening and will be a vital part of the national effort to eradicate the disease and allow further relaxation in the absence of a vaccine. It is a critical part of our help to support the NHS and avoid a second lock down.
- The objective is to capture basic information on who is on the premises or in the site for any length of time so that should a person test positive for COVID, contact tracers can rapidly identify any interactions they had with others and hopefully break the chain of infection.
- The more granular the detail collected, the more effective the contact tracing can be and crucially the easier it will be to rule out more of your staff and customers from infection.
- This is not mandatory, but all businesses and customers are encouraged to participate

### Who and what do I record?

- The objective is to get sufficient information on customers and staff to allow local NHS and public health professionals to follow up with them about anyone they may have come into contact with.
- This does not mean you need to get information on every single customer – as a broad rule of thumb:
  - Those eating or drinking in the premises or in the gardens or outdoor tables provided by the premises you need to take a name and number
  - You only need one contact name and number for each group i.e. the person making the booking or reservation in advance, or making the purchase
  - If it is a genuine take away for consumption off the premises, you don't need to track and trace
- Ideally, you should also get a broad indication of the time they were on the premises e.g. time booking (or sitting) started, how long a table was booked for and an indication of departure or dwell time by shift or session if they are not booked in for a specific time slot (estimates may be used)
- You also need to keep information on staff working on site, including arrival and departure and ideally which part of the premises they are working in – restricting work areas will minimise disruption if there is an infection as you will be able to rapidly eliminate staff members who have only worked in certain places
- If you are able to identify which customers sat at which tables that will also be a helpful piece of information which could be used to eliminate customers and staff from risk profiles
- You are free to decide how best to capture and record this information – there are no mandatory requirements about how collection is carried out
- Information should be recorded on contractors working on site but not for those carrying out deliveries or pick-ups (including third party delivery couriers)

### How do I record this?

- Information can be collected through a variety of means, you do not have to take details as everyone arrives at the venue

- Name and number can be taken in advance remotely through a telephone booking, an online reservation, or at point of entry or at point of sale – this is your choice
- Information can be captured digitally and automatically through booking, ordering, payment or check in apps or through automatic wi-fi to indicate dwell time or any combination of these - you may use multiple sources of existing data in order to gather the necessary info
- Manual collection on pen and paper is also permitted, though you may want to consider the hygiene consequences involved with shared pens, etc, as well as data protection rules that do not allow other customers to see private information.
- If a customer refuses to provide their details, then they do not have to provide it and you can allow service. However, for the safety of staff and customers you may wish to refuse service. If you do permit service and have collected data for a booking you need to exclude this data from your track and trace dataset.

#### **What do I need to do then?**

- You will be required to store the data for 21 days
- The data will only be needed if there are outbreaks or chains of infection involving people visiting or working on your premises – you do not need to do anything else with the data
- You will then be contacted by local public health departments or NHS contact tracers and asked to provide as much information as possible about those on site at given times and places who may have interacted with the customer or staff member who has tested positive.
- Remember, you are looking to identify those who have been in sustained contact with an infected person – closer than 1m for 1 minute or 2m for 15 minutes – so if you can identify where the person sat or worked you may be able to eliminate members of your team and customers from contact tracing.

#### **What about GDPR?**

- If you are already capturing data from customers through online booking, reservations, wi-fi or app usage then you will be automatically allowed to share this on request with the NHS or local public health team.
- You do not need to have individual consent in respect of COVID, but it would be sensible to include the NHS standard form of words and information request about track and trace data consent on your website, at point of sale and when capturing data manually
- You only need to capture name and contact number for COVID purposes but you are able to capture additional information if you have the necessary permissions, but you do not have the right to share that additional data with anyone else.
- If you are collecting data only for COVID 19 purposes, then you should ensure that you have individual consent – people have the right to refuse – and if it is solely held for that purpose then it must be destroyed after 21 days
- If you collect and have permission for the capture and use of other personal data, then you do not need to destroy this