



ENVIRONMENTAL HEALTH

Our ref: COVID-19 Collection of contact details
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Dear Business Operator

COVID-19 COLLECTION OF CUSTOMER, VISITOR AND STAFF CONTACT DETAILS

As restrictions ease and venues reopen, I want to take this opportunity to notify you of recent changes to the requirements for collecting customer, visitor and staff contact details.

To support the investigation and management of COVID-19 outbreaks, the Collection of Contact Details Regulations require you to display an **NHS QR code poster** and request that customers and visitors check in to your premises.

If individuals do not have the NHS COVID-19 app, you must have a system in place to collect their name and contact details instead (advance bookings where contact details are provided can serve as the source of this information) or a log book for example.

Individuals should only be asked to check in with either the NHS QR code, or by providing their contact details, but not both. In addition, you must also ensure you have up to date staff contact details and records for when staff are on the premises.

You must now also request that every individual scan the NHS QR code or provide their contact details upon arrival, not just the lead member of the group. This is to make sure that every person can receive timely public health advice if they may have been exposed to COVID-19.

You should make sure that all your staff have been notified of this change and understand that they are now required to ask all people entering the venue to scan the NHS QR code or provide their contact details. Exemptions include children under the age of 16 and people entering the venue for drop off / takeaway only.

Before reopening your venue, you must make sure that you understand your obligations to:

- Display an official NHS QR code poster
- Request that all customers and visitors scan the NHS QR code or provide their contact details
- Keep a record of all staff including shift times
- Provide an alternative method to collect contact details which doesn't require ownership of a smartphone
- Keep information securely for 21 days before destroying it, and provide it to NHS Test & Trace if requested

- **Hospitality venues only:** Take reasonable steps to refuse entry to those who refuse to participate. This means you must to the best of your ability comply with the requirement to refuse entry and you should satisfy yourself that you have done all that could reasonably be expected.

As England exits lockdown, customer, visitor and staff records will support local teams with enhanced contact tracing in responding quickly to clusters and outbreaks of COVID-19.

In the event of a suspected cluster or outbreak, NHS Test and Trace will use contact tracing information to identify venues where individuals may have been exposed to COVID-19 and need to be contacted. If this happens, your venue will be contacted to request your logbook and you will be given detailed instructions about how to do this at the time, as well as further guidance and support about what this means for your business. Your venue will not automatically need to close, and your venue will also not be named when we contact individuals.

Individuals will be contacted with a 'warn and inform' message – this is not an instruction to self-isolate; it simply reminds them to follow guidance and look out for symptoms. In some instances, we may recommend that they book a test. App users who checked in with the NHS QR code will receive this as a notification via their app, and non-app users or those that left their contact details will be sent this message via SMS.

Do not be concerned if you are not asked to share your logbooks – this simply means that we have not identified multiple positive cases linked to your venue. It is still essential to maintain logbooks or NHS Test and Trace cannot contain outbreaks where they do occur.

Compliance checks on venues will commence from 12 April 2021 (for those businesses able to reopen - and from May for all other venues). Please ensure that you are complying with the Collection of Contact Details Regulations as breaches of these requirements will result in penalties.

Further guidance on the requirements can be found here: <https://www.gov.uk/guidance/maintaining-records-of-staff-customers-and-visitors-to-support-nhs-test-and-trace>

The Information Commissioners Office (ICO) has produced guidance to ensure that you are GDPR compliant when collecting and storing contact details: <https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/coronavirus-recovery-data-protection-advice-for-organisations/maintaining-records-of-staff-customers-and-visitors-for-contact-tracing-purposes/>

If you require clarification of the requirements or have any questions, please contact the Commercial team using the details given below.

Yours faithfully

Commercial team
Environmental health

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