

NHS Test and Trace Guidance for Commissioned Providers

NHS Test and Trace is a dedicated service for contact tracing, and is a key part of the country's ongoing COVID-19 response. It is made up of national and local public health experts who undertake contact tracing under the supervision of Public Health England (PHE). When cases are linked to a high risk settings, for example a care home or school, or are particularly complex, Public Health England will lead the process of contact tracing.

The easing of social and economic lockdown measures following the outbreak means that organisations providing services commissioned by Gloucestershire County Council (GCC) will need to assist this service by keeping a temporary record of customers and visitors. This needs to be done in a way that is manageable, and can support NHS Test and Trace to rapidly identify people who have recently come into close contact with a new COVID-19 case. This will then enable swift action to be taken to minimise transmission of the virus, contain clusters and prevent further outbreaks.

Purpose/ Scope

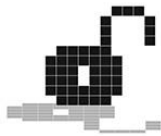
This guidance has been created to outline the expectations of GCC as commissioner / contract manager regarding the Data Protection considerations that **all commissioned services** should take when capturing data to support the NHS Test and Trace service. It is applicable to all services that will be open to the general public or any services accepting face to face visitors in a formal (e.g. scheduled meetings) or informal capacity (e.g. drop in services).

What's required?

[The government guidance released on 2nd July](#) sets out what information needs to be collected. Please ensure you familiarise yourself with this guidance if your service is required to collect NHS Test and Trace information.

The following information should be collected by each service, where possible:

- Staff
 - the names of staff who work at the premises
 - a contact phone number for each member of staff
 - the dates and times that staff are at work
- Service users and visitors
 - the name of the service user or visitor. If there is more than one person, then you can record the name of the 'lead member' of the group and the number of people in the group



- a contact phone number for each service user or visitor, or for the lead member of a group of people
- date of visit, arrival time and, where possible, departure time
- if a service user interacts with only one member of staff, the name of the assigned staff member should be recorded alongside the name of the customer.

You should collect this information in a way that is manageable. If not collected in advance, this information should be collected at the point that visitors enter the premises, or at the point of service if impractical to do so at the entrance. It should be recorded digitally if possible, but a paper record is acceptable too.

Who will ask for this information?

NHS Test & Trace will contact your organisation directly if a person who has tested positive for COVID-19 informs them that they have visited your premises or been in close contact with members of staff or other service users. They will ask you for the contact details of anyone who the person would have had contact with.

What to consider



Ask for only what's needed

You should only ask people for the specific information that has been set out in government guidance.

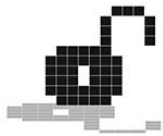
You should not ask people to prove their details with identity verification, unless this is a standard practice for your business.



Be transparent with customers

You should be clear, open and honest with people about what you are doing with their personal information. Tell them why you need it and what you'll do with it. You could do this by displaying a notice in your premises, including it on your website or even just telling people. To assist services in being transparent your organisation should create a standard Covid-19 Test and Trace privacy notice.

If you already collect customer data for bookings, you should make it clear that their personal data may also be used for contact tracing purposes.



Carefully store the data

You must look after the personal data you collect. That means keeping it secure on a device if you're collecting the records digitally or, for paper records, keeping the information locked away.

See our further guidance on simple security measures below.



Don't use it for other purposes

You cannot use the personal information you collect for contact tracing for any other purposes, such as direct marketing, profiling or data analytics.



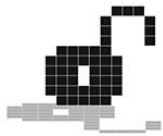
Erase it in line with government guidance

You should not keep the personal data for longer than the government guidelines specify (currently 21 days). It's important that you dispose of the data securely to reduce the risk of someone else accessing the data. Shred paper documents and permanently delete digital files from your recycle bin or back-up cloud storage.

Keeping information Secure

It is important for services to support NHS Test and Trace by making sure that the information collected is accurate, easily located and most importantly secure. When looking to implement new, or reviewing the compatibility of current processes, you will need to make sure that the information is held securely in line with your organisation's policies. As a start consider these basic security measures:

- Make sure your staff understand what they should and shouldn't do with customer information. You should ensure that your staff are aware that it is a criminal offence under the Data Protection Act to obtain or disclose customer information without your organisation's consent.
- Do not use an open access sign-in book where customer details are visible to everyone.
- Keep any paper records in a safe place, with measures to prevent unauthorised access (e.g. locked doors, safes, CCTV).
- Consider which members of staff need access to the logs and limit access to those staff.
- Do not store customer logs in an accessible, unsecured file.



- When deleting or disposing of logs, do so in a way that is not open to unintended access (e.g. shredding paper documents as opposed to disposing them in public refuse bins, and ensuring permanent deletion of electronic files).

Further advice and guidance

If you need any further advice or guidance on NHS Test and Trace data collection or how to keep information secure, you should discuss this further with your organisation's data protection lead.