




## Hospitality Sector coopted for NHS Test and Trace


### Privacy Issues


#### Guidelines


 **DO** explain to visitors why you are asking for their contact details: i.e. to help NHS Test and Trace respond to local Covid-19 outbreaks (or because the law requires you to do this – if the Government passes such a law). You could put up a large sign and make sure you draw visitors' attention to the sign (see example below), as well as explain why in person.


 **DON'T** ask for more information than what's needed for NHS Test and Trace to follow up with the visitor. For example, if the visitor only wants to give you a phone number, don't insist on their email address, and vice versa. There does need to be some way to contact them but home addresses aren't necessary and should be indicated as optional.


 **DO** explain this to visitors even when you obtain their details online or on the phone, for example, because they are giving you their contact details to make a booking or reservation, and remind them when they arrive.


 **DON'T** use visitor contact details for any other purposes, like sending them marketing texts or emails, or for a bartender to get in touch with an attractive visitor!


 **DO** note the date/time of each visitor's visit alongside their contact details.

 **DON'T** share the details with anyone other than NHS Test and Trace, or allow anyone else to access them. Beware of fraud attempts, where someone posing as NHS Test and Trace may try to get the information. Make sure you call back or email NHS Test and Trace contacts to check they are genuine.


 **DO** store visitors' contact details/visit information securely, immediately.


 **DON'T** store the visitor contact/visit information forever – make sure that you securely delete or destroy the information after an appropriate period – 21 days is the current Government guidance.

 **DO** make sure that as few people as possible, e.g. only your senior manager, can access these details, for example keeping the records in a safe (if available). This includes electronic as well as paper storage, for example making sure the password is not shared.

 **DO** make sure you only give the information relevant to the period stated, if requested by NHS Test and Trace to provide visitor contact details. E.g. who visited your restaurant, hotel, bar, café or beer garden during X to Y dates. Don't provide

any other visitors' contact or other details. Also, make sure you send the information securely, e.g. encrypted document attached to an email.

 **DO** the above for all visitors, whether paying customers, their guests or other visitors.

 **DO** make sure you send the information securely, e.g. encrypted document attached to an email.

### Example Sign

"We are [business name], Phone: [ ] Email: [ ] Address: [ ]

**Purpose:** we are collecting and storing your contact details to help NHS Test and Trace respond to local Covid-19 outbreaks, which is in their legitimate interests. We are doing so in accordance with Government guidelines. We won't give anyone your details except NHS Test and Trace, and we'll only give it to them if they ask for it.

**Storage and deletion:** we'll securely delete your contact details 21 days after we received them, if the NHS hasn't requested them by then.

**Your rights:** you can (subject to some legal requirements or limitations) ask to access your details, correct them, delete or restrict access, object to our holding them, or get them back in electronic form, and you can complain to the Information Commissioner at <http://ico.org.uk> if you're not happy with anything."

*[Note/Disclaimer: This is provided as an indication of a suitable sign, but is "short form". Proper legal advice should be obtained to ensure it is fully compliant in your situation.]*