



Dear

As restrictions ease and venues reopen it is essential that we have the right tools in place to help prevent transmission of COVID-19. To support outbreak management, you must comply with the Collection of Contact Details Regulations which 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 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). 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. I want to take this opportunity to notify you of recent changes to the requirements, remind you what processes you need to have in place, and share materials to support you and your staff.

These Regulations are essential for protecting public health objectives and supporting the safe reopening of businesses to boost the economy. Customer, visitor, and staff records are a key component of enhanced contact tracing and will support local teams to respond to clusters and outbreaks in their area as England exits lockdown. As COVID-19 prevalence drops, enhanced contact tracing will become increasingly important in enabling local teams to respond to outbreaks quickly.

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 in preparation as breaches of these requirements will result in penalties. Before reopening you should ensure you understand and are adhering to all the requirements.

The Regulations were amended 29 March 2021 and **you must now 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 do 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.

NHS Test and Trace will use contact tracing information to identify venues where other individuals present 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 individuals to follow guidance and look out for symptoms. In some instances, we may recommend individuals 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.

Further guidance on the requirements can be found on the GOV.uk website:  
<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/>

Understanding and implementing the Collection of Contact Details Regulations effectively to support NHS Test and Trace is vital to protecting public health, continued easing of restrictions, and the return to a normal way of life.

Yours faithfully