



## **North Shields FC – The Robins Nest – Test and Trace Policy**

### **NHS Test and Trace**

NHS Test and Trace is a key part of the country's ongoing COVID-19 response. If we can rapidly detect people who have recently come into close contact with a new COVID-19 case, we can take swift action to minimise transmission of the virus. This is important as lockdown measures are eased and will help us return to a more normal way of life and reduce the risk of needing local lockdowns in the future.

NHS Test and Trace includes dedicated contact tracing staff working at national level under the supervision of Public Health England (PHE) and local public health experts who manage more complex cases. Local public health experts include both PHE health protection teams and local authority public health staff.

You can read further information on [how NHS Test and Trace works](#).

### **The purpose of maintaining records**

By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, you can help us to identify people who may have been exposed to the virus. Containing outbreaks early is crucial to reduce the spread of COVID-19, protect the NHS and social care sector, and save lives. This will help to avoid the reintroduction of lockdown measures and support the country to return to, and maintain, a more normal way of life.

You can play a significant role in helping your staff, customers and visitors understand the importance of NHS Test and Trace and play their part in stopping the spread of COVID-19. Please do this by explaining why you are asking for contact information and encouraging them to provide it.

In addition to maintaining and sharing records where requested, you must also continue to follow other government guidance to minimise the transmission of COVID-19. This includes maintaining a [safe working environment](#) and following [social distancing guidelines](#).

### **Information we will collect**

The following information will be collected by North Shields FC, where possible:

#### **Staff**

- the names of staff who work at North Shields FC
- a contact phone number for each member of staff

- the dates and times that staff are at work

### **Customers & visitors**

- the name of the customer 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 customer or visitor, or for the lead member of a group of people
- date of visit, arrival time and, where possible, departure time

No additional data should be collected for this purpose.

We will collect this information in a way that is manageable for our establishment. 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. This will be collected on a sign in sheet at the entrance of The Robins Nest.

Recording both arrival and departure times (or estimated departure times) will help reduce the number of customers or staff needing to be contacted by NHS Test and Trace. We recognise, however, that recording departure times will not always be practicable.

### **If someone does not wish to share their details, or provides incorrect information**

Although this is voluntary, please encourage customers and visitors to share their details in order to support NHS Test and Trace and we advise that this information will only be used where necessary to help stop the spread of COVID-19.

If a customer or visitor informs you that they do not want their details shared for the purposes of NHS Test and Trace, they can choose to opt out, and if they do so you should not share their information used for booking purposes with NHS Test and Trace.

The accuracy of the information provided will be the responsibility of the individual who provides it. We do not have to verify an individual's identity for NHS Test and Trace purposes.

### **How records will be maintained by us**

To support NHS Test and Trace, we will hold records for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this information should be securely disposed of or deleted. When deleting or disposing of data, you must do so in a way that does not risk unintended access (e.g. shredding paper documents and ensuring permanent deletion of electronic files).

Records which are made and kept for other business purposes do not need to be disposed of after 21 days. The requirement to dispose of the data relates to a record that is created solely for the purpose of NHS Test and Trace. All collected data, however, must comply with the General Data Protection Regulation and should not be kept for longer than is necessary.

## **General Data Protection Regulation (GDPR)**

The data that we are asking you to collect is personal data and must be handled in accordance with GDPR to protect the privacy of your staff, customers and visitors. This section sets out the steps we can take to comply with GDPR.

GDPR allows us to request contact information from your staff, customers and visitors and share it with NHS Test and Trace to help minimise the transmission of COVID-19 and support public health and safety. It is not necessary to seek consent from each person, but we should make clear why the information is being collected and what we intend to do with it.

For example, if we already collect this information for ordinary business purposes, we should make staff, customers and visitors aware that their contact information may now also be shared with NHS Test and Trace.

We do not have to inform every customer individually. We might, for example, display a notice at your premises or on your website setting out what the data will be used for and the circumstances in which it might be accessed by NHS Test and Trace. We may need to offer some people additional support in accessing or understanding this information, for example, if they have a visual impairment or cannot read English.

While consent is not required, we recommend that consent is sought in sensitive settings such as places of worship and for any group meetings organised by political parties, trade unions, campaign or rights groups, other philosophical/religious groups or health support groups. This is because of the potentially sensitive nature of the data collected in these circumstances.

Personal data that is collected for NHS Test and Trace, which we would not collect in our usual course of business, must be used only to share with NHS Test and Trace. It must not be used for other purposes, including marketing, profiling, analysis or other purposes unrelated to contact tracing, or you will be in breach of GDPR. We will not misuse the data in a way that is misleading or could cause an unjustified negative impact on people e.g. to discriminate against groups of individuals.

Appropriate technical and security measures must be in place to protect customer contact information, and the [ICO has produced guidance](#) on this. These measures will vary depending on how you choose to hold this information, including whether it is collected in hard copy or electronically. We would prefer you to record and protect information electronically, but we understand this might not be possible.

We must ensure that individuals are able to exercise their [data protection rights](#), such as the right of erasure or the right to rectification (where applicable).

### **When information should be shared with NHS Test and Trace**

NHS Test and Trace will ask for these records only where it is necessary, either because someone who has tested positive for COVID-19 has listed your premises as a place they visited recently, or because your premises have been identified as the location of a potential local outbreak of COVID-19.

NHS Test and Trace will work with you, if contacted, to ensure that information is shared in a safe and secure way. You should share the requested information as soon as possible to help us identify people who may have been in contact with the virus and help minimise the onward spread of COVID-19.

NHS Test and Trace will handle all data according to the highest ethical and security standards and ensure it is used only for the purposes of protecting public health, including minimising the transmission of COVID-19.

### **If you are contacted by NHS Test and Trace**

Contact tracers will:

- call you from 0300 013 5000
- send you text messages from 'NHStracing'
- ask you to sign into the [NHS Test and Trace contact-tracing website](#)

Contact tracers will never:

- ask you to dial a premium rate number to speak to them (for example, those starting 09 or 087)
- ask you to make any form of payment or purchase a product or any kind
- ask for any details about your bank account
- ask for your social media identities or login details, or those of your contacts
- ask you for any passwords or PINs, or ask you to set up any passwords or PINs over the phone
- disclose any of your personal or medical information to your contacts
- ask about protected characteristics that are irrelevant to the needs of test and trace
- provide medical advice on the treatment of any potential coronavirus symptoms
- ask you to download any software to your PC or ask you to hand over control of your PC, smartphone or tablet to anyone else
- ask you to access any website that does not belong to the government or NHS

