



HM Government



Test and Trace

Customer Logging

A toolkit for business

Please note: this guidance is for England only.

ENJOY
Summer
SAFELY



Customer logging - overview

As specific venues start to re-open from 4 July 2020, we know you want to ensure your staff and customers are as safe as possible.

We all have a role to play in preventing the spread of coronavirus. Sticking to the national [government guidelines](#) including regular hand washing, good respiratory hygiene and social distancing will all help to prevent the spread of coronavirus.

How can you help?

We need you to help your local communities stay safe from coronavirus by keeping a record of staff, customers, and visitors to your venues.

By keeping a log of customers, staff and visitors Test and Trace can use this information to get in touch with anyone who was at the venue at the same time and could be at risk of the virus if someone tests positive.

This will protect your staff and customers from coronavirus by containing outbreaks before they occur, preventing the return of lockdown measures which may require you to close.



Test and Trace - Containing the virus

NHS Test and Trace is central to the Government's COVID-19 recovery strategy. It aims to minimise the transmission of COVID-19, contain the spread of the disease and enable people to return to, and maintain, a more normal way of life.

Despite the lifting of lockdown in most areas, the COVID-19 alert level still means that the virus is in general circulation. We need to work together to defeat it whilst also allowing businesses like yours to reopen and get on the road to recovery.

The problem with COVID-19 is that it thrives where people gather. That's why we've issued guidance to help minimise the risk to the public, including on how you can help.

It is important to recognise that managing outbreaks is very dynamic. It is a complex system with multiple partners who all have a valuable role to play. The aim is to empower local decision makers, not detail every possible scenario. Continuous improvement is critical as we learn more about the virus and how to control outbreaks.

The key elements of our approach to outbreak control at a local level include

- prevention through identifying and supporting high-risk settings and local community engagement;
- active and rigorous monitoring of the virus locally, nationally and internationally, with
- rapid identification and management of cases and their contacts and;
- early detection and active management of outbreaks



Messaging

We understand you will want to communicate this to your staff and customers/visitors.

We have compiled messaging for a range of scenarios for you to use;

- Businesses/organisations
- Venue managers (from head office)
- Customers

We know you'll want to communicate in your own way, so feel free to use this as you see fit, tweaking it to suit your audience and branding. The examples in this document are examples only, which we hope are useful.

Please remember you will need to ensure your privacy statements are up-to-date on how you will secure your customers data. A Department of Health and Social Care Privacy notice can be find in our resource folder here:

https://drive.google.com/drive/folders/11h4E_AJXbFI7U7A3R2JcTHJtsEjJPXMc?usp=sharing



Example messaging for businesses/organisations

We are asking that, from Saturday 4 July, you take the names and contact details of any customers/visitors who spend time in your premises. You will be asked to share this information with NHS Test and Trace if someone who has been on your premises tests positive for coronavirus.

We are asking that you do this to help mitigate the risk of, or manage, any local outbreaks so we can continue to enjoy summer safely.

Doing this will help manage and contain local outbreaks, allowing you to stay open by minimising the risk of reintroducing lockdown measures.

Not only will you be playing your part to keep your local community safe but you will be contributing to the national effort to control the virus and, ultimately, save lives.

Many businesses will already have systems in place to record customers' details so please continue to use these. Where possible venues should keep separate records for Test and Trace purposes so that the deletion/retention of data is clear



Example messaging for venue managers

Being able to reopen on Saturday is welcome news but in order for us, and other local businesses, to stay open, it's important that we do what we can to reduce the risk of local outbreaks of coronavirus.

We therefore ask that you record contact details, as well as times of entry and exit for individual customers, or a lead customer for a group spending time on site - note this does not apply where customers are buying food or drinks to consume off the premises. You will need to take a name and either a contact number or email address and store this, securely, for 21 days. If you are asked by NHS Test and Trace you will need to share this with them.

Doing this will help manage and contain local outbreaks, allowing you to stay open by minimising the risk of reintroducing lockdown measures.

Not only will you be playing your part to keep your local community safe but you will be contributing to the national effort to control the virus and, ultimately, save lives.

Please make sure all colleagues are aware of these additional measures and the system you have in place for recording customer details.

It's also important that customers feel confident that their information is being stored securely and will not be shared or used for any other purpose. You will need to give written information to customers if they request this.



Example messaging for customers

We're really pleased to be able to re-open on Saturday and we want to be able to stay open so we're introducing new measures to help keep everyone safe.

We'll be taking contact details from customers, plus the times they are on the premises. These will need to be kept for 21 days and, if asked, we will provide them to NHS Test and Trace.

Please be reassured that your information will be stored securely, in line with data protection laws, and will not be shared with anyone else. We will also not use your data for anything else like marketing.

We are doing this to help reduce the risk of any local outbreak - by sharing your information NHS Test and Trace can quickly identify people who have come into contact with someone who has tested positive for COVID-19 and ask them to take the necessary precautions.



Example poster text: Entrance to a venue

Short text - i.e. A4 poster on your door

Keeping you safe - All customers will be asked to provide contact details on entry to help us reduce the risk of a local outbreak of coronavirus and stay open.

Long version (where able to display)

Keeping you safe

Our customers are the heart of our business and we want you to enjoy summer safely

In order to help reduce the risk of a local outbreak of coronavirus we are taking contact details of customers, as well as recording times entering and leaving our premises.

In line with guidance issued by the government, we will keep your details for 21 days. We will only share them with NHS Test and Trace, if asked, in the event of a fellow customer testing positive for coronavirus.

Please help us keep our customers, staff and the wider community safe by cooperating.

Thank you for your understanding.

Entrance to a bar

Please supply contact details and times of entry to/exit from bar to help us reduce the risk of a local outbreak of coronavirus and stay open



Example copy - Venue website

Please note that in order for us to open on 4 July and remain open, we will be putting the following measures in place until further notice:

- You must make a booking. This allows us to maintain safe distances between customers and to keep track of the number of people in the premises at any one time.

Please note the booking policy is not in government guidance. This is for your venue to decide we are simply giving an example.

- In order to help reduce the risk of a local outbreak of coronavirus, we are taking contact details for customers, as well as recording times entering and leaving our premises.

In line with guidance issued by the Department for Health and Social Care, we will keep your details for 21 days. We will share them with Test and Trace personnel, if asked, in the event of a fellow customer or staff member testing positive for coronavirus.

Data will be handled according to GDPR, security and ethical standards at every stage of the process – from its collection and storage by us to its transfer and use by NHS Test and Trace. NHS Test and Trace will handle all data according to the highest ethical and security standards and it will be used only for NHS care, management, evaluation and research.



Example copy: Places of worship

At entrance

All visitors must provide contact details on entry to help us reduce the risk of a local outbreak of coronavirus.

Further information available inside

NHS Test and Trace

In order to support the NHS Test and Trace programme, we are taking contact details for all visitors, as well as recording times entering and leaving [name of place of worship].

In accordance with guidance issued by the government, we will keep your details for 21 days. We will share them with NHS Test and Trace personnel, if asked, in the event of a fellow customer testing positive for coronavirus.

We are taking measures to ensure our data collection complies with GDPR legislation and we will not use your details for other purposes or pass it to other organisations.

Thank you for your understanding.



Information Commissioner Office

The below guidance has been issued by the regulator to businesses in regards to customer logging.

Protecting customer and visitor details

We understand that organisations have lots of new measures to put in place so that they can re-open safely to the public. For many, this includes collecting customers' and visitors' personal information for the first time, to support the various Test and Trace schemes in the UK.

It doesn't need to be complicated - there's no need for you to develop special apps or digital solutions – just choose the process that best suits your business.

Follow our five simple steps to help ensure that data protection is not a barrier to your recovery.



Guidance - continued

Ask for only what's needed

You should only ask people for the specific information that has been set out in government guidance. This may include their name, contact details and the date and time of their arrival.

You should not ask people to prove their details with identity verification, unless this is a standard practice for your business, eg ID checks for age verification in pubs.

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.

If you already collect customer data for bookings, you should make it clear that their personal data may also be used for NHS Test & Trace.



Guidance - continued

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.

Don't use it for other purposes

You cannot use the personal information that you collect for NHS Test & Trace for 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. 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, for example.



Customer Q&A

Q. Can I come in if I don't want to give you my details?

A. This is for individual venues to decide. We recommend all customers/visitors provide their contact details.

Q. Why are you doing this?

A. We are doing this to help reduce the risk of a local outbreak of coronavirus and in line with government guidance. We want to do everything we can to protect our staff, customers/visitors and the wider community.

Q. What will you do with the data?

A. In line with guidance issued by the government, we will keep your details for 21 days. We will only share them with NHS Test and Trace, if asked, in the event of a fellow customer testing positive for coronavirus.

After 21 days we will delete/destroy your details. It will not be used for marketing or other purposes.

Q. I don't trust you to keep my data secure

A. All businesses that take personal information must comply with relevant data protection law. We have provided information [[your venue link](#)] about how we will keep your data secure.



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This messaging was issued on 2nd July 2020. For further information or questions please email;
TTDHSCexternalaffairs@dhsc.gov.uk



We produce a weekly newsletter on NHS Test and Trace. You can sign up to receive this by emailing;
TTDHSCexternalaffairs@dhsc.gov.uk