

ACRE Information Sheet Appendix M

NHS Test and Trace QR code



From 24 September the Regulations for the Collection of Contact Details require **every hirer or organisation using a community hall** to comply with the obligation to either collect individual contact details of their participants or ask participants to scan the QR code displayed at the hall.

The hall is expected to register for an NHS QR code and display the official NHS QR poster at or inside the entrance. A hall must also keep records of hirers' contact details. A hall will also need to either collect contact details of participants at their own meetings and events or ask participants to scan the QR code displayed at the hall.

For practical purposes this means that **the premises** must [register for an official NHS QR code](#) and display the official NHS QR poster, although some hirers may choose to obtain their own code and poster, which they display at the entrance of the room or hall that they are using before their activity starts. For some halls with only a few hirers who are willing to do this, that responsibility could be placed on hirers.

The important principle to remember is that the system is intended to capture information about with whom people have been in close proximity, not necessarily very precise details of the place where that contact took place.

Official NHS QR posters can be [generated online](#). Click the links to register and generate a poster. There is more information about NHS QR codes and how to generate them on the [NHS COVID-19 app website](#).

Village and community halls need to reinforce the obligation on hirers to keep records through the Special Conditions of Hire (Appendix E of v6 of the Information Sheet). Clause SC9 should be adjusted to read:

SC9:

You **MUST** keep a record of the date and time the activity started and the name and contact telephone number or email of all those who attend your event (or a member of any group of up to 6 people who attend together). This can be done either by operating an advance booking system which collects these details, or by asking everyone who attends to use the NHS QR poster at the hall entrance to register their attendance and by keeping a record of any who do not register using their smartphone app and the hall's NHS QR poster or your own NHS QR poster.

The guidance is at: [Maintaining records of staff, customers and visitors to support NHS Test and Trace](#).

Further points:

1. The aim is that those attending can use the QR code if they wish to do so.
2. Village and community hall committees and managers organising activities at the hall will have to comply, including for their own committee meetings.
3. Community halls with no postcode can use that for the nearest available property.
4. Halls with several rooms in use for different activities will need to consider how to avoid the same code being used for two or more activities happening at the same time. This will be covered if hirers have their own QR code for the activity they are running.
5. Organisers of activities can decide how to collect and keep contact details, which should be collected at the point visitors enter the premises if not collected in advance. If on paper it needs to be kept out of public sight and securely stored. People who choose to 'check in' using the official NHS QR code do not also need to provide their contact details. Use of the NHS QR code cannot be made a precondition of entry (individuals have the right to choose how to provide their contact details).
6. If there is an outbreak associated with a venue, a message will be sent to the relevant app users with the necessary public health advice.
7. Places of worship, including when the venue is used for community activities, are not included but are strongly encouraged to maintain staff and visitor logs and to display an official NHS QR code poster. Consent should be sought from individuals entering.
8. If a visitor interacts with only one member of staff (eg, a hairdresser), the staff name should be recorded alongside the name of the visitor
9. A record of all staff working on the premises on a given day, the time and contact details must be kept. This covers anyone providing a service or activity including volunteers. This would include cleaners, caretakers and those working in offices such as Parish Council staff.
10. Booking systems can serve as the source of information collected. (Visitors can still scan the official NHS QR code if they wish, to help remind them where they have been if asked by NHS Test and Trace.)
11. The NHS COVID-19 app is only able to scan official NHS QR code posters. If another QR code system is being used to collect contact details, you should switch to the official NHS QR code system.
12. If someone does not wish to share their details, entry does not have to be refused but visitors should be encouraged to share their details to support NHS Test and Trace. The accuracy of the information provided will be the responsibility of the individual who provides it. However, entry must be refused to cafes (including community cafes), bars and Social Clubs, when the police can be called if required.

13. Exempt visits: Details are not required from: A police officer or emergency responder on duty, suppliers or contractors making a delivery or collection, those under the age of 16, if someone does not have the mental capacity to provide their contact details.
14. **Failure to comply with collecting details and maintaining records is punishable by a fine.** The first fixed penalty is £1,000.
15. Records should be maintained for 21 days then securely disposed of or deleted, unless also collected for another purpose. All collected data must comply with GDPR.
16. NHS Test and Trace or Public Health Officers will ask for these records only where necessary eg if the premises have been identified as the location of a potential COVID-19 outbreak. This information must not be shared with anyone else, so as to respect individuals' privacy. You must share the requested information as soon as possible to help minimise the onward spread of COVID-19. If you receive a request for information from NHS Test and Trace, this does not mean you must close the hall. NHS Test and Trace will, if necessary, undertake an assessment and work with you to understand what actions need to be taken.
17. If a staff member or visitor tells you they have tested positive for COVID-19, you should tell them to stay at home and self-isolate as soon as possible (along with the rest of their household) and encourage the individual to inform NHS Test and Trace of their recent contacts. You must not use the information you have collected to contact people. If you identify that there is more than one case of COVID-19 on your premises, you should contact your [local health protection team](#) to report the suspected outbreak.
18. A poster bearing the same QR code will be required at other entrances to the same premises, such as changing rooms, but not at exits such as fire doors. Clubs providing team sporting activities which have their own premises (eg a pavilion) will need their own poster. A poster is not required for a public toilet serving an outside area such as a recreation field.

30 September 2020