

COVID-19 NHS Test & Trace Data

Issue Date	Version	Issued by
7 th August 2020	3	The House of Bishops Recovery Group
Updates from version 1: The text has been updated to include links to services supporting collecting of Test and Trace data, provided through Parish Buying.		

The Recovery Group has been set up to support the Church of England as government guidance changes through the COVID-19 pandemic. This document has been prepared with information available by the issue date. It will be kept under review and updated as the situation develops, with each update issued as a new version. The current version will always be available to download from the Church of England website via the [Coronavirus FAQs page](#).

This guidance should be read alongside the advice from Government on collecting data for [NHS Test & Trace](#) and for [places of worship](#).

Along with other venues where people spend time churches are strongly encouraged to keep a record of those who have attended to facilitate [NHS Test and Trace](#) in the event of an outbreak of coronavirus.

The service includes:

- a) providing testing for anyone who has symptoms of coronavirus to find out if they have the virus;
- b) getting in touch with anyone who has had a positive test result to help them share information about any close recent contacts they have had; and
- c) alerting those contacts, where necessary, and notifying them that they need to self-isolate to help stop the spread of the virus

The opening up of public places following the COVID-19 outbreak is being supported by NHS Test and Trace. In line with government guidance church bodies should assist this NHS service by keeping an accurate temporary record of clergy, staff and visitors to their church buildings for 21 days, in a way that is manageable for the church body and providing that data to them if they request it.

If you already have a booking system, either on-line or by phone etc, this can be used to collect the data required by NHS Test and Trace. Please be aware that you might collect more data from worshippers or members of the public for bookings than is needed for test and trace, so you will need to only provide what the government have specified to NHS Test and Trace. Details of this are shown on page 3.

In collecting this data you need to let potential participants know what you are intending to do with their details, when these might be accessed by NHS Test and Trace and clearly get their consent for this purpose. You can, for example, use a consent form and display a privacy notice at your premises or on your website.

Privacy Notice templates for display in buildings and for online use together with a version of the Government template consent form are available [here](#), which you can adapt and use. Please note you

must amend the template as indicated for it to be specific for your church. If you are unsure about details, please seek advice from your Data Protection Officer or lead contact for data protection.

As an alternative to completing the consent form the Government and the Information Commissions Officer have advised that an explanation of why the data is being collected from the top of the consent form can be read out in the service or to the individual coming into the building and their name, telephone number, date/time and an explicit tick to indicate their consent to their data being used for NHS Test and Trace. For staff and those who volunteer working in the building they can have their attention drawn to the wording of the Privacy Notice or wording on the consent form and record their name, telephone number, date/time and an explicit tick to confirm consent on a sheet when they enter.

If hand sanitiser is provided prior to individuals recording their data then a single pen can be used to do this, or individuals can be encouraged to bring their own.

Recording consent for children

The Government guidance states that young children should be supervised by a parent or guardian when coming to a place of worship. If you are collecting data for NHS Test and Trace the details of the parent or guardian of an accompanied young person or child need only be collected.

For unaccompanied children or young people aged 13 years old or over, they can be asked to provide their details and sign the consent form, or make an individual booking where consent is required. You may need to explain to them what the data is being collected for so they understand what Test and Trace is about, rather than relying on them reading and understanding the privacy notice on their own.

Where young people or children are coming unaccompanied then we would advise consulting [Safer Environment and Activities](#) from the National Safeguarding Team and adding a safeguarding assessment as part of the overall risk assessment for opening, particularly sections 1.3 on risk assessment and 2.10 on young people who attend church activities without their parents.

Recording consent on-line

If your booking system is an on-line website, you will need to amend it to provide a clear consent statement if you don't already have one – you can use the statement as shown on the template consent form, and provide a Yes/No Option or another clear method for obtaining consent. Please do not provide a Yes option only. Leaving a box unticked or an option unselected is not sufficient as it could be an error.

On-line privacy notice

If you already have a privacy notice with your on-line booking system, you will need to either amend it to add the additional purpose and lawful bases for NHS Test and Trace i.e. combine the two privacy notices, or remove it and replace it with the template provided.

If you choose to amend your existing privacy notice, you should get the relevant information from the template privacy notice and be specific about what data you are collecting for bookings, and what data will be shared with NHS Test and Trace.

The information to collect

The following information should be collected, where possible:

Staff and Volunteers

- the names of the people who work at the premises
- contact details for each of the people who work there
- the dates and times that people are at work

Worshippers and Visitors

- the name of the worshipper 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
- contact details 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.

It is suggested that for worship someone be available at the entrance to help facilitate the collection of the data.

If someone does not wish to give information they may choose to opt out. They should not be barred from worship.

Please note that if anyone does not wish to give their details, government guidance is that although this is voluntary, we should encourage people to share their details in order to support NHS Test and Trace and advise them that this information will only be used where necessary to help stop the spread of COVID-19.

The information should be stored and deleted after 21 days in a way that does not risk unintended access (e.g. shredding paper documents and ensuring permanent deletion of electronic files).

Technological solutions

In many cases existing systems of information gathering – including paper-based systems – will be adequate for Test and Trace. For those churches that wish it, Parish Buying has collaborated with tracking specialists Promotigo to offer parishes a specially discounted digital service that will keep a register of visitors. The service is quick and simple to set up, and takes away all the hassle of managing the personal data, including the requirement to delete it after 21 days, and following up on Covid positive cases, by acting as data controller. More details of this can be found on the [Parish Buying website](#).

If the NHS contact you

The advice document explains how the NHS would contact us should they wish to receive any of the data and how to be sure that you are giving it to the right people.

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