

**Policy Statement & Privacy Notice for Data Collection in Support of the  
Covid-19 NHS Test & Trace Programme**

As a hospitality business, we are under a legal obligation to collect & retain (for a specified period) contact details of customers, guests, other visitors & staff to assist NHS Test & Trace, which is a key initiative to minimise transmission of the Covid-19 virus.

Under this legal requirement we must ask 1 member of every party who visits our premises (typically the 'lead booker') to provide their contact details.

We are also legally required to not accept a table booking for a group of more than 6 individuals or to admit a group of more than 6 people ("The Rule of 6"), other than for people living together (or are in the same support bubble).

Groups larger than 6 must be split into groups of 6 or less, with no mixing between any other groups within our premises being permitted. Each group must also have a separate 'lead booker' who must provide their contact details.

Hospitality venues such as ourselves are also required to refuse entry to those who refuse to provide contact details.

In relation to our staff members, we also record & retain their start & finish times for each working day/shift, along with their contact details.

We also record the attendance of other visitors, such as contractors, sales personnel, delivery personnel, etc., who are also required to provide their contact details.

**Q & A**

**What personal data do we require?**

We require the full name of the customer, visitor, guest or 'lead booker'.

We also require a phone number, or email address if no phone number is available, or a postal address if neither a phone number nor an email address is available.

**Why is it not necessary to collect contact details from everyone in the same booking?**

It is assumed that the 'lead booker' will know & so have access to the contact details of all members of the party. However, if members of the party are not known to the 'lead booker', then their full name + phone number/email/postal address should also be provided.

**Will you record any other information concerning our booking or attendance?**

We shall record the date of visit; the number of people in the group; the arrival time & the departure time – all to better assist the NHS Test & Trace initiative.

### **When & how will my personal data be obtained & how will it be recorded?**

Collected data will be obtained at the time of booking where advance reservations are made, or on arrival in the case of no advance booking.

Data will be recorded manually on a dated daily attendance register.

In line with legal requirements, we shall also display an official NHS QR code poster from 24 September 2020 so that customers & visitors can also check-in via this means\*.

\* Please note that this electronic method will be an optional & supplementary means to check-in & so contact details must still be provided verbally as detailed above. This will avoid every member of every group (not just the 'lead booker') having to download the app, scan the QR code & prove that they have signed into being at our premises. Anyone wishing to use the app to record their attendance can, of course, & are encouraged to do so via any of the QR code posters on display.

### **Where will manually-collected data be stored?**

Collected data will be stored securely so as to be outside of the access of other members of the public & staff, other than those staff members authorised to collect or access the data.

### **To whom will the data be shared?**

We shall only share the collected data with the NHS via its agents engaged in the Test & Trace programme.

### **How long will my personal data be retained for?**

In accordance with Government requirements, the contact data collected will be retained for 21 days beyond the date of each attendance at The Crown Inn.

### **How will manually-collected data be destroyed?**

Data will be destroyed by shredding.

### **Are your data collection processes compliant with data protection regulations?**

Yes, our process of data capture & recording are compliant with data protection legislation, specifically the Data Protection Act 2018.

In addition, the law on protecting personally identifiable information, known as the General Data Protection Regulation (GDPR), allows Public Health England to use the personal information collected by NHS Test and Trace. The section of the GDPR that applies is:

*Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'*

As information about health is a special category of personal information, a further section of the GDPR applies:

*Article 9(2)(i) 'processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare'*

Public Health England also has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without people's consent where this is in the public interest.

Should you have any further questions on the subject, please contact us.

Thank you.