

Frequently Asked Questions regarding Test, Trace and Protect (TTP)
Updated 1st September 2020

Do Golf Clubs need to implement Test, Trace, Protect (TTP) and collect contact details?

Contact detail collection **is now a legal requirement**. Clubs should implement an appropriate and thorough record-keeping system. This will support the Welsh Government's Test, Trace, Protect strategy in terms of staff on duty at the club, and individuals using the facilities to ensure they can be traced, contacted, advised to self-isolate and tested accordingly for Coronavirus by TTP. This is in the event of them having used the facilities, or been working at the venue, at the same time as an individual, or staff member, who has since tested positive for Coronavirus.

Is consent required for Test, Trace and Protect (TTP)?

Consent is not required to use contact information for TTP. The terms upon which any individual can participate in an activity can be defined by the NGB (Wales Golf) or club. If the club asks for consent for contact details to be passed to the Test, Trace and Protect Service (TTPS) and this consent is refused, the club will not be able to refuse entry to an activity without breaching data protection law. This is because the club has made the consent conditional and not a free choice. The WSA (Welsh Sports Association) recommend that you avoid using consent for this purpose.

On the basis that the Welsh Government advice requires sports activities and events to be organised, it is, therefore, reasonable for the club to insist on having contact details so that changes to any event can be communicated quickly to avoid any unnecessary gathering or travel.

It is at the club's discretion whether to advise participants that their details will be passed to the TTPS in the event of a COVID incident. The club would need to consider if this will cause fear and put people off or instil confidence.

Under the data protection law, participants DO NOT need to be advised that details will be passed on to TTP. The law allows the club to pass their details to TTP without consent.

Contact information will also need to be collected for those consuming food and drink on the premises.

What contact information is required?

The following details should be taken:

Staff

- Names of staff who work at the premises.
- A contact telephone number for each member of staff.
- The dates and times that the staff are at work.

Customers, participants and visitors

- The names of customers or visitors, or if it is a group of people, the name of one member of the group – the 'lead member'.
- A contact telephone number for each customer or visitor, or if this is a group from the same household the lead member of that group.
- Date of visit and arrival and departure times.

Welsh Government Test, Trace and Protect information, which can be used to show your customers can be found [here](#).

For further information, visit

<https://gov.wales/test-trace-protect-process-summary-html>
<https://gov.wales/test-trace-protect-your-questions>

How long should this information be kept?

The information should be kept securely in line with your GDPR policy for a minimum of 21 days of the customers last visit to the facility also check with your insurance company.

Q Should we ask our insurers how long we keep participants data?

A Yes. Your insurance company will handle any claims under your public liability with regard to Covid or any other claim arising from an activity. To help with claim handling they will find evidence of attendance useful. It will also help the insurer to assess whether the risk originated from the club's activity or elsewhere. Your insurers are best placed to advise on this.

How does the Test, Trace and Protect Service (TTPS) Work?

It is important to understand how the TTPS operates to ensure that it is effective without causing fear or unnecessary work. Much of the advice of Welsh Government is confusing when it discusses isolation and testing of persons suspected of being infected. It is NOT the role of any club or NGB officer to instruct anyone to isolate or book a test.

How it works

- The person who suspects they may have Covid-19 (or has symptoms) should self-isolate along with other members of their household
- They should apply for a test. This can be done online or by telephoning NHS 111
- If the test is positive, they will be contacted by the TTPS
- The TTPS will get details of contacts the infected person has had since two-days prior to the first symptoms
- The TTPS will contact each person that has been in close proximity to the infected person. This is when your organisation will be contacted
- You need to give the TTPS all the details of those in attendance at the date and time the TTPS tell you

- The TTPS will NOT tell you who has tested positive unless the individual has given permission. If you are told DON'T make any note of it – it is unimportant and recording it may be unlawful.
- Information given to you is CONFIDENTIAL
- DON'T contact anyone yourself, not even staff, it is the job of the TTPS to do this.
- The process is outlined here: <https://gov.wales/test-trace-protect-guidance-employers>

Here are some resources that can be used to help support TTPS for group lessons but can be adapted for multi-purpose use.

- A self-declaration and registration form template can be found [here](#)
- An example register of attendance can be found [here](#)

What does the club do if someone advises that they have Covid-19?

If someone who has been at your site calls to inform the club that they think they have COVID-19 or have symptoms, urge them to contact the Coronavirus 111 services using the link above or by calling 111. Do not express any opinion on the matter other than you think they should access the NHS services.

- Don't panic. It may not be Covid-19.
- Tell them to contact the Coronavirus NHS service for help and advice.
- Do not record any details about them as this may be unlawful. Do not spread any gossip. You should inform your organisation's Coronavirus Officer.
- Coronavirus Officers should contact the Coronavirus 111 service for advice if they are unsure.
- Notify Wales Golf of the situation but do not disclose any known details of any individual.
- DO NOT contact other people who may have been at the session. You are not allowed to do this lawfully. Let the TTPS do their job.
- Seek advice from your Coronavirus Officer about extra cleaning that may be required.

Q Would it be sensible to ask a visiting team to provide contact details in advance?

A It would be very sensible. You should also communicate the requirements of the Covid self-declaration and make sure that the visiting team are aware that spectating is not allowed. Remember that they may be operating under the rules of a different home nation and may not be aware of our local restrictions and guidance.