NOTE THIS GUIDANCE IS SUBJECT TO REVIEW AND CHANGE IN LINE WITH CHANGES TO THE ALERT LEVEL 2 ORDER

Contact tracing requirements COVID-19 Alert Level 2

Prepared by: Incident Management Team with the Professional Practice Group and Legal Services

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This is updated guidance about how to comply with the requirements to record information to enable the Ministry of Health and District Health Boards to carry out contact tracing:

- Under the Covid-19 Public Health Response (Alert Level 2) Order (the ‘Alert Level 2 Order’), we have a legal obligation to record contact details of those who visit us and those who we visit – this includes their full name, other reliable form of contact (phone or email) and the date and time of their arrival and departure
- We can make this information available upon request from a Ministry of Health or District Health Board contact tracer without consent of the individuals involved.
- Contact tracing requirements should not prevent us responding to critical or very urgent situations involving tamariki or rangatahi safety or wellbeing.

THIS IS INTERNAL GUIDANCE FOR ALL ORANGA TAMARIKI STAFF WHO MAY BE INVOLVED IN ENGAGING WITH MEMBERS OF THE PUBLIC

Oranga Tamariki provides essential services to tamariki and their whānau. In all of our engagement with tamariki and whānau, we need to:

- be guided by our values and ensure the safety and wellbeing of our tamariki
- follow our current COVID-19 health and safety guidance
- apply this practice guidance
- consider our existing practice guidance and operational policy where it does not conflict with the specific guidance provided here.

If you need more information, discuss with your supervisor or manager or contact covid19response@ot.govt.nz, and check the daily updates on Te Pae.

Requirements to keep records to enable contact tracing

The ability for public health officials to rapidly trace the close contacts of anyone where COVID-19 is suspected or confirmed is one of the core instruments of prevention of COVID-19 transmission as it enables the quick identification and isolation of others who may have been exposed.

As a crown agency we are bound by the Alert Level 2 Order. This order requires that we keep a record of anyone who we come into contact with, when they enter an Oranga Tamariki site or use our services (including offsite visits). We must record:

- a person’s full name
- an effective means of communicating with them (phone or email), and
- the date and time the person arrived and left.
Because of the specific nature of our work, contact tracing has particular sensitivities and risks for our staff and those we work with. We must ensure that we fulfil these requirements while also upholding their privacy and safety. This means that we comply with the Alert Level 2 Order requirements in a manner which is, to the fullest extent possible, consistent with the Oranga Tamariki privacy guidelines and principles (staff resource) (PDF 357KB) around the purpose, source and means of collection of private information, and how it is securely stored and appropriately used or disclosed.

**Advising tamariki, whānau, caregivers and partners of requirements**

We must let those we visit or who visit us know of our legal requirement to record their contact details and that these will be released to public health officials if requested for the purpose of contact tracing and no other purpose. Consent to release contact information if requested to do so by a Ministry of Health or District Health Board contact tracer is not required under the provisions of the Health Act 1956.

To support these conversations:

- The Screening Tool and Planning Tools for Engagement prompt these discussions
- The Contact Tracing forms reference privacy considerations and will include a clear statement about the provisions under which the information collected will be shared
- The Playing it Safe resources designed to be given to tamariki, whānau and caregivers explain our health and hygiene must-do’s, including contact tracing provisions and sharing of this information with health officials.

Wherever possible, these conversations should occur, and contact details be ascertained, before the office or home visit, with the details of arrival and departure entered at the time of the visit. Otherwise this conversation must occur at the beginning of the visit.

Many of the whānau, caregivers and others we work with will have genuine safety fears about their personal information being accessed by others. It is critical that we take time to understand and allay these fears by providing clear and simple information about the steps we are taking to ensure the safety and privacy of their information.

**Recording contact information**

Individuals and sites will need to ensure that they have processes in place that enable safe and appropriate recording for the purposes of contact tracing.

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<thead>
<tr>
<th>Type of contact</th>
<th>Recording tool</th>
<th>Recording approach</th>
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<tbody>
<tr>
<td>Being at work (offices, sites, residences and homes)</td>
<td>Daily staff log (staff resource) (DOCX 105KB)</td>
<td>A record is kept using the daily staff log of all Oranga Tamariki staff on site for that shift or rostered period. Note: while residences are not bound by the Alert Level 2 Order in the same way as other parts of Oranga Tamariki this continues to be good practice in ensuring health and safety.</td>
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## Type of contact

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| Visits to workplace including group meetings such as family group conferences | Visitors and contractors register (staff resource) (DOCX 278KB) | A record is kept of all visitors to the workplace. This will contain personal information which if shared would compromise the privacy, and potentially the safety, of those concerned. Therefore we must take particular care in the method of collection, storage and destruction of this information. We must not allow people to enter their personal contact details directly into a register which has the personal contact details of others. Therefore contact details may be:  
  - (where planned) ascertained by phone ahead of the visit and recorded on the register with times confirmed on arrival or  
  - obtained verbally or electronically (text message, email or using an onsite electronic register) from the visitor on arrival (with care taken given public space that details are not overheard) or  
  - written down by the visitor on an individual piece of paper and transcribed to the register (with care taken around pen hygiene). |
| Home visits                                 | Individual contact tracing log (staff resource) (DOCX 140KB) | The full contact details of all people you have had close contact with during the visit are recorded in your individual log. You must do this personally and not provide the log to others to enter their own details. |
| Visiting other agencies                     | Individual contact tracing log (staff resource) (DOCX 140KB) | Comply with the requirements of other agencies, providing your contact details, and also make note in your individual log as appropriate. If you are concerned about providing your information or the manner in which it is being collected, speak to your line manager or an agency representative. |
| Tamariki in care and caregivers             | Caregiver contact tracing log (staff resource) (DOCX 139KB) | Like all New Zealanders, we have asked caregivers to keep a daily record of close contacts for all members of their household, including tamariki in care and anyone who visits the home or is in contact with them. |

### Inability to ascertain contact details

There may be occasions when we are unable to identify the individual visiting our workplaces or ascertain full contact details in the timeframe required to undertake the visit or where individuals may be unwilling to provide their details for this purpose. We should seek to understand the reason for this reluctance and whether there is another way of resolving the concern.

Contact tracing requirements should not prevent us responding to a critical or very urgent situation involving tamariki or rangatahi wellbeing or safety. We should consider if proceeding with the engagement without fulfilling the recording requirement is the only way
to address a safety or wellbeing need for tamariki. If so, we should proceed with the home or office visit. In all other cases, we must make alternative arrangements.

Examples where contact details may not be able to be ascertained:

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<th>Scenario</th>
<th>Action and Considerations</th>
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<tr>
<td>An unplanned visitor to the office wishes to see a specific staff member but refuses to provide contact details</td>
<td>We must first determine whether the visit is for the purpose of addressing a critical or very urgent tamariki safety need. If it is, proceed with the visit. If not we must support the visitor to facilitate contact with the relevant staff member by alternative means to remaining in the office (eg by phone). If after having taken these steps, the visitor remains unwilling to provide contact details for the purpose of contact tracing, they must be asked to leave. The date and time of the visit should be recorded with any missing details recorded as 'unknown'.</td>
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<tr>
<td>A member of the public presents in person wishing to report concerns about tamariki but remain confidential</td>
<td>The visitor should remain on site while the information regarding tamariki safety is being obtained from them even if contact details cannot be ascertained. A record of the date and time of the visit should be recorded with any missing details recorded as 'unknown'.</td>
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<td>An entitled member of a family group conference wishes to attend in person but is not willing to disclose full contact details</td>
<td>We must make it clear during the convening phase that they are unable to be present at the family group conference in person if they are not willing to disclose contact details for contact tracing purposes. If individuals refuse to provide contact details for this purpose, but we already have their contact details through our usual casework, and the individual chooses to attend, we need to make it clear to them at the earliest opportunity that we will consider releasing this information to health officials if requested to do so. If we are unable to ascertain the contact details of an individual (including if they present at site on the day) they will not be able to stay and attend the conference in person. In such cases, if they are an entitled member, we must make every effort to support their participation by remote means or ensure their views are considered.</td>
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<td>An unplanned visit to a home has been necessary to address a critical safety need and it is not possible to discuss contact tracing requirements or ascertain contact details of all present during the visit</td>
<td>We should proceed with the visit and actions required to ensure tamariki safety and update the individual contact tracing record with as many details as are known.</td>
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<td>A planned home visit where additional people are present at the visit are not prepared to identify themselves for the purpose of contact tracing</td>
<td>If the individuals who are not able or willing to be identified are not prepared to move to another part of the home for the duration of the visit, we should only complete the visit if it is essential to the safety and wellbeing of tamariki. We should record the details of anyone we had contact with during the visit, to the extent that these are known or can be ascertained. Record missing details as 'unknown'.</td>
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Storing contact information

Individual staff members and caregivers will be responsible for maintaining and safely storing their own individual tracing log. All logs and registers must be stored safely in a place that cannot be accessed by members of the public at any time. These records should be stored for 2 months in accordance with Government guidance. At the conclusion of this time, the information, whether held physically or electronically, must be appropriately disposed of or deleted.

Use of contact information

If through their contact tracing, health officials identify a potential link between an individual where COVID-19 is suspected or confirmed and an Oranga Tamariki location, staff member, caregiver or tamariki, they will make contact and request contact tracing information relating to that individual and/or their contacts. We are able to provide this information to a Medical Officer of Health if requested under the provisions of the Health Act 1956. Such requests should be escalated to your Executive Manager or equivalent role.

Where we become aware that there may have been close contact where COVID-19 is suspected or confirmed, we should follow the relevant health and safety guidance (staff resource) and contact Healthline for further advice. Where this occurs we should also be prepared to provide relevant contact tracing logs.

Because we have already advised individuals at the time of their contact with us that we would share the information if requested by Ministry of Health, it is generally not necessary to advise them that a request has been received and we do not need to seek their consent to release the information. Doing so could create greater confusion and anxiety than if they were contacted directly by public health officials who can provide immediate health information and advice. The exception to this is where the information request concerns our staff, tamariki in care or caregivers and we have additional obligations to address their safety, wellbeing and support needs. This would include promoting the importance of testing and self-isolation in order to keep themselves and others safe.

Information sought for the purpose of recording contacts should not be used for another purpose. If contact details were required both for contact tracing and for ongoing assessment or intervention we must make clear the legal basis of and undertake the required steps for obtaining and using information for each purpose.

We may be asked by health officials to provide contact information about an individual who has accessed our services and was unwilling or unable to provide full contact details. In such cases we should consider whether to release known contact details obtained during the course of our usual work and recorded in CYRAS as this may be an allowable exception under Principle 10 of the Privacy Act 1993. If releasing information in this context we should advise the individual we are doing so if practicable.

Individuals may also request access to their information, including contact tracing information, in the usual way under the Privacy Act 1993.

Advice or assistance

For further advice or assistance about the collection or use of information, talk to your supervisor, manager, Legal Services team or Information Management and Privacy team.