

File Reference: SRSA20 - 00572

17 November 2020

RDS2020/16 v1: QR Track and Tracing

Re: Destruction of source or original QR Track and Tracing Application records after completion of contact tracing

Purpose

The purpose of this RDS briefing is to seek the State Records Council's approval of a determination made under section 23 of the *State Records Act 1997* (the SR Act) to dispose of records (data) received through the QR Track and Tracing Application or hardcopy equivalent.

Background

As part of its response to the COVID-19 pandemic the South Australian (SA) Government has investigated and developed digital track and tracing mechanisms utilising QR Code applications and associated collection technologies (QR Code application and associated technologies). There are 2 underpinning technologies being used - QR codes which are to be scanned using the "mySAGov" application and Scantek. This system will be known as "SAfe Check In" when released publicly.

The aim of the QR Code application and associated technologies is to support existing contact tracing processes that are in-place within SA. To do this the QR Code application and associated technologies collect a minimal amount of personal information (for example name, contact number or email and date/time entered venue) through the use of smartphones when an individual enters a particular location, for instance a licensed venue. This system is aimed to support tracking the attendance location of persons attending high risk public activities and other activities which might present a higher risk of community transmission.

Within SA this initiative is being led by SA Health in partnership with the Department of the Premier and Cabinet (DPC).

The data collected through the QR Code application and associated technologies is, upon capture, immediately encrypted and transferred to a SA Government data store which is managed by the Office of Data Analytics, DPC. Once in the data store it is decrypted and held in that store for 28 days. The data is an official record for the purposes of the *State Records Act 1997* (the Act) and as such it is governed through the policies of State Records.

Through the implementation of the national COVID App the federal government stipulated that data collected for the purposes of track and trace in relation to the pandemic will only be retained as long as is necessary for track and tracing purposes and certainly for not longer than the pandemic remains. In general terms it is taken that data will be retained for 28 days. This approach to data retention has been supported through changes made to the Commonwealth *Privacy Act 1988* (the Privacy Act) and through Orders issued under that Act with State and Territory health authorities.

It is necessary that the data collected through the QR Code application and associated technology be managed in line with the intent of the Commonwealth Government, that is, it is only retained for as long as necessary to undertake the track and trace program and for not longer than the pandemic remains.

Discussion

The approach taken through this disposal schedule ensures that South Australia manages track and trace data in a manner that is consistent with the Commonwealth Government's intent in relation to the retention of that data.

This determination permits the destruction of records (data) received through the QR Code application and associated technologies which is stored in the SA Government data store and used for track and tracing purposes.

For the purposes of this determination contact tracing has the same meaning as defined in subsection 94D(6) the Privacy Act.

This determination commences on the date approved by the State Records Council and applies to data collected from the commencement of use of QR Code applications and associated technologies in South Australia.

Disposal Determination

Item	Records description	Disposal action
1	Records collected or generated through the operation of the QR Track and Trace application and associated technologies, or hard copy equivalent, which is used to support contact tracing activities.	Destroy as soon as practicable when no longer required for contact tracing purposes, or immediately following the declaration of the end of the pandemic period, whichever is sooner.

Application

This determination authorises the destruction of records containing track and trace data which is collected through the QR Code application or associated technologies when no longer required for purposes of contact tracing as well as the hard copy equivalent.

RECOMMENDATION

It is recommended that the State Records Council:

- approves RDS2020/16 v1
- notes that in approving RDS 2020/16 v1 this constitutes a disposal determination by the Director of State Records in accordance with s23(2)(a) of the *State Records Act 1997*.

Approved:



Keith Nicholas

Chair, State Records Council



Simon Froude

Director, State Records