

File Reference: SRSA20-00583

26 November 2020

## **RDS2020/17 v1: COVID Home Quarantine App**

**Re: Destruction of source or original COVID Home Quarantine Application records after the completion of Home Quarantine.**

### **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 COVID Home Quarantine Application.

### **Background**

As part of its response to the COVID-19 pandemic the South Australian (SA) Government has investigated and developed an application to assist with home quarantine checks and potentially collect information about the health of the individual in quarantine. This initiative is being led by SA Health.

This application is currently under development by SA Health and is due to go live in mid-December. The aim of the initiative is to enable a person in home quarantine to download the application which once downloaded allows them to be monitored remotely by SA Health, rather than through personal visits from SAPOL.

The application will be used by SA Health to send alerts to persons in home quarantine. Upon receiving an alert the person will be required to take a 'selfie' in the application. The person's photo and location data will then be sent back to SA Health and checked against their quarantine direction to confirm whether they are complying with their home quarantine conditions.

To do this the following indicative data will be initially loaded into the application from SA Health:

- Email address
- First name
- Last name
- Date of birth
- Phone number
- Length of quarantine in days (e.g. 14)

- Quarantine address
- Quarantine address lat/long
- Quarantine start date/time

Data collected from individuals in home quarantine via the application will include the image data (on each check in), location data (only when using the application) and device information. Data may also be collected on health symptoms of the person if this feature is used in the future.

The data collected through the application will be stored in the Amazon Web Service (AWS) which resides in Australia.

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 COVID Home Quarantine 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 home quarantine and for not longer than the pandemic remains.

SA Health also anticipates that in the future the application will be used to collect information about the health of the person in quarantine. This will be done by asking users to complete a short survey of symptoms. These symptoms are from the SA Health symptom list. It is known that those with symptoms should get tested earlier than Day 12. Therefore by knowing this information an automatic message can be sent which details testing locations and also advises of GP and emergency numbers.

Currently close contacts of COVID-19 positive patients, in which we have over 4000 at the moment, are sent this survey on a daily basis via a sms through our contacts database system. This then triggers a call from Communicable Disease Control Branch (CDCB) and testing within the home. We would look to mirror a similar process with this application.

This feature however will not be activated in the near future.

SA Health's intention is to separate the quarantine data (location, facial records, check in details etc) from the medical data and only destroy the quarantine data 28 days after the person completes quarantine.

The health data the application may collect in the future is not covered by this RDS and will need coverage under a future SA Health RDS.

## Discussion

The approach taken through this disposal schedule ensures that South Australia manages home quarantine 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 Home Quarantine application and associated technologies which is stored in the AWS store.

This determination commences on the date approved by the State Records Council and applies to data collected from the commencement of use of COVID Home Quarantine application and associated technologies in South Australia.

## Disposal Determination

Item	Records description	Disposal action
1	Records collected or generated through the operation of the COVID Home Quarantine application and associated technologies, which is used to support compliance with home quarantine conditions.	Destroy as soon as practicable when no longer required for home quarantine 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 compliance with home quarantine conditions which is collected through the COVID Home Quarantine application or associated technologies when no longer required for home quarantine conditions.

## RECOMMENDATION

It is recommended that the State Records Council:

- approves RDS2020/17 v1
- notes that in approving RDS 2020/17 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**