



Government of **Western Australia**
Department of **Health**

Your Ref:
Our Ref:
Contact:

The Honourable Mark McGowan MLA
Premier of Western Australia
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SCOPE EXTENSION FOR CONTACT REGISTERS

Dear Premier

On 5 December 2020, the requirement for prescribed businesses and venues to implement contact registers became mandatory in Western Australia (WA), with the option of using the SafeWA QR code app. The implementation of mandatory contact registers in WA is a valuable risk mitigation measure to assist the WA Department of Health with contact tracing, should it be required. Contact tracing, in combination with quarantine and potential testing of contacts, is a key risk management component as lockdown measures are gradually lifted, although modelling studies have predicted that contact tracing alone cannot control an outbreak if tracing coverage is too low.

Background

South Australia was the first state to include all retail venues within the scope of the contact registration requirement, though many retail stores have voluntarily complied with the requirement since its commencement in WA.

A review of case locations published by the New South Wales and Victorian Governments identified the prominence of retail, public transport and hospitality as the venue types most frequently visited by cases. Most cases in NSW during the recent outbreak visited retail premises (supermarkets, pharmacies, hardware etc). Essential goods and services were the most frequented venue types by cases.

Further to this, the National Contact Tracing Review, conducted by Dr Finkel on behalf of the Commonwealth of Australia, recommended that contact tracing registration is required in health care services, including hospitals.

Contact Registers

Given the reliance on contact registers in NSW and Victoria for contact tracing purposes during their recent COVID-19 outbreaks, a review of the existing requirements in WA has been undertaken to address the lessons learned and identify

opportunities to strengthen the COVID safety measures. This is particularly relevant given that WA has considerably eased community restrictions, while the pandemic continues to worsen overseas. Three important guiding principles have been applied to determine where contact registers may be most appropriately required:

1. evidence of venues visited by cases and/or where transmission has occurred in other states;
2. targeting venues where you could not reasonably expect the business to know customer details; for example, clothing retail stores versus financial service businesses where appointments are usually made, and personal details are recorded as part of usual business; and
3. in alignment with health advice.

In the event of an outbreak in WA, it is also highly likely that retail stores that provide the community with essential goods, such as supermarkets and pharmacies, would remain open. Many hospitality venues are likely to pivot to providing takeaway only services if they are permitted. A mandatory contact registration requirement in retail stores and takeaway venues would assist in the event of further outbreaks. Most other venues, which are currently in scope, would likely be closed.

This matter was considered by the State Disaster Council (SDC) on 22 January 2021, who endorsed the expansion of the current contact register requirements to include the following businesses:

- Retailers including supermarkets, department stores, shopping centres, pharmacies, hardware and general retailers.
- Entertainment venues to specify inclusion of party buses/boats, tour buses/boats (recreational transport).
- Take-away food services (excluding drive-through).
- Venues with a COVID Event Plan, extending to outdoor events such as corporate functions and wedding ceremonies.
- Users of public transport should be encouraged to register their SmartRider to ensure details available. Added SafeWA QR codes on free CAT buses to be considered.

Hospital visitors were not specifically covered. Given the broad nature of health care, I recommend that any expansion to include healthcare services be applied to hospital visitors only, as a first step. Hospitals are high risk environments, and the flow of visitors is currently anonymous in many instances. It is therefore recommended that this is addressed by ensuring visitors to hospitals are included within the scope of mandatory contact registration. Visitors should include anyone who is not a patient (inpatient or outpatient) or staff of the hospital. For example, persons visiting patients or attending meetings/lectures, couriers, and contractors. The intent is to capture people attending a hospital whose details would not normally be captured through other patient or hospital administration systems. Hospital patients will be captured by patient administration systems, such as WebPAS, and appointment booking systems. Staff will be captured by roster and electronic access passes.

Extending mandatory contact registers into health services more generally should be done in consultation with the sector to ensure there are no unintended consequences; for example, some people may be deterred from visiting mental health, sexual health, and/or alcohol and other drug services if they are concerned about the security of data obtained via contact registration. Consultation with sector leaders across the spectrum of health care services could take place during February and March 2021.

Recommendations

In summary, for the reasons outlined above, I am of the current view that the existing contact register requirements should be extended to capture;

- retail outlets;
- takeaway food and beverage outlets;
- events;
- recreational transport; and
- hospital visitors

I further recommend that the existing contact register requirements, contained in the 'Closure and Restriction (Limit The Spread) Directions (No 11.)', issued under the *Emergency Management Act 2005*, should be amended to include those businesses and venues endorsed by the SDC and hospital visitors effective from 12 February 2021. Please see Attachment 1 for a table detailing the proposed inclusions.

Given the continuing changes in the epidemiology in other States and the situation in Western Australia, I am happy to re-consider the above advice should there be significant changes in the public health situation. The expansion of contact registers will continue to be reviewed in response to the COVID-19 situation. Additional venues could be added to the scope if deemed appropriate.

Yours sincerely



Dr Andy Robertson
CHIEF HEALTH OFFICER

28 January 2021



Attachment 1

Scope statement	Inclusions	Exclusions
Retail		
All businesses that involve the retail sale or hire of goods and services for personal, household or business use with customers who are physically present.	<p>Retail venues such as shopping centres, supermarkets, pharmacies, hardware stores and department stores.</p> <p>General retail refers to customer-facing premises that provide the retail sale or hire of goods and services for personal, household or business use. This includes a range of industries that are not solely retail trade, but have customer facing retail components, such as:</p> <ul style="list-style-type: none">• Financial services e.g. bank branches (ATMs excluded)• Postal services e.g. post offices• Insurance services e.g. customer service branches of Medibank Private, HBF etc.• Manufacturing e.g. customer facing showrooms• Wholesale trade e.g. 'cash n' carry' customer retail components• Agriculture and food production e.g. retail sales direct to the public• Public administration e.g. driver licensing centres. <p>Staff and visitors to the above retail premises e.g. contractors, delivery drivers, repairs services etc.</p>	Online only retailers
Takeaway food and beverage		
The proposed extension of the contact registration requirement to takeaway food and beverage venues reflects that, operationally, many of these venues	All businesses that involve the sale of takeaway food and beverages:	Drive through takeaway food and beverage vendors e.g. coffee, fast food.

Scope statement	Inclusions	Exclusions
involve wait times that exceed 15 minutes during busy periods. Lessons learned from other jurisdictions indicate that in the event of an outbreak, a high proportion of case locations are likely to involve hospitality venues including takeaway.	<ul style="list-style-type: none"> Stand-alone takeaway stores e.g. fish and chip shops, cafe and espresso bars, pizza bars, kebab shops, bubble tea, fast food, etc. Indoor food courts and markets e.g. arcade and shopping centre food courts, takeaway food and beverage vendors in indoor markets. 	Outdoor food and beverage trucks/carts e.g. coffee/food truck or cart, ice-cream van
Events		
The requirement to keep a mandatory contact register will extend to Events required to have a COVID Event Plan (events with 500+ patrons) and outdoor events under 500. Lessons learned from other jurisdictions indicate that in the event of an outbreak, relying on ticketing and credit card information provides incomplete contact records for events and delays in capturing the contact tracing data. Currently in WA, if an event under 500 is not held at a venue required to keep a mandatory contact register, then there is limited ability to contact trace attendees at these events.	<ul style="list-style-type: none"> Weddings; Corporate events; Festivals/carnivals Community fetes and pop up markets (including food markets); and Funerals / memorial services. 	Community sport
Recreational transport		
Private or commercial buses or vessels: <ul style="list-style-type: none"> With the capacity to carry 12 or more passengers, and where different groups of patrons interact at any one time. 	Party buses, wine and food tour buses, hop on/hop off tour buses (e.g. Perth City Tour Bus), sightseeing tours (e.g. Pinnacles Tours) and activity-based tours (e.g. Lancelin Dune Tours), party/function boats and sightseeing/tour boats.	Vehicles and boats where it is less likely different groups of patrons, unknown to each other, will interact (single group bookings less than 12 passengers)
Public transport		
Paid transport: Encourage the registration of SmartRiders through a public awareness campaign with the aim to increase the	Paid and free public transport (buses, trains, ferries)	Taxis and ride shares, while considered public transport, are not captured in this proposal. The number of people at any given

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<p>cohort of public transport users that can be contact traced</p> <p>Free transport: encouraging passengers in the FTZ to tag on/off services with a SmartRider, and place the SafeWA QR code on CAT buses</p>		<p>time on these types of transport is limited and contact tracing can be done via booking systems and credit card payments.</p>
Hospitals		
<p>Hospitals will be required to maintain a contact register for visitors. Visitors include anyone who is not a patient (inpatient or outpatient), or staff of the hospital. For example, persons visiting patients, couriers or contractors. The intent is to capture people attending a hospital whose details would not normally be captured through other patient or hospital administration systems.</p>	<p>All private and public hospitals in WA</p>	<ul style="list-style-type: none"> • Specialist and primary health care services, including general practice • Other health care services, including day procedure units • Allied health, including psychological services, podiatry, occupational therapy • Complementary medicine, including naturopaths, osteopaths, acupuncturists