Passenger Contact Tracing

Background

If a passenger has been diagnosed with a communicable disease or is suspected of having a communicable disease, it may be thought necessary for public health reasons to locate the people who have been in close contact with this passenger, to advise them of the exposure and to carry out tests to see if they have contracted the disease. This is what is referred to as 'contact tracing' and is a public health responsibility.

Passenger contact tracing is a controversial issue. Some countries do not believe in the value of contact tracing for certain illnesses while other countries do. Furthermore, some countries do not have the resources to find and treat these illnesses, let alone do contact tracing. This situation results in many different approaches that lack standardization and harmonization. Even when there are international guidelines available (e.g. World Health Organization (WHO) TB Guidelines for Air Travel), several countries deviate significantly from those guidelines. The current process also relies heavily on many different stakeholders such as passenger travel agents, airlines, and different public health authorities. The process may be further complicated by differing legal requirements for data protection in the countries involved.

In an effort to improve and possibly harmonize the process, in 2004, while preparing the revision of the International Health Regulations (IHR), WHO asked the International Air Transport Association (IATA), to draft a template for a Passenger Locator Card (now Passenger Locator Form or PLF) that could be recommended to the countries that wanted to do contact tracing. IATA agreed to do so and used the expertise of the WHO Informal Transportation Working Group to validate a document that was eventually accepted by WHO, International Civil Aviation Organisation (ICAO) and IATA.

However, IATA stated from the beginning that it saw that project only as a stopgap measure until a better system was developed and believes that the system should be electronic. The PLF can only cover two of the three possible scenarios, i.e. a suspected case of communicable disease on board and routine collection of information on all passengers during a pandemic. The third scenario, i.e. notification that a contagious passenger has travelled after the flight has landed and the passengers dispersed, cannot be covered by the PLF. IATA also created a Passenger Contact Information Working Group, a group of data acquisition experts and airline representatives to analyse the issue. They

confirmed that the electronic data gathering would be the most practical way of dealing with this particular issue, as it would allow data to be obtained quickly without generating other problems.

Proposal

IATA is not advocating contact tracing, but if a country decides to implement contact tracing and since contact tracing is a public health authority responsibility, the contact tracing process should be generated and led by the public health authority of the countries that believe in contact tracing and want to do it. The data collection should be in electronic format and the request / requirement for data collection should be directly between the country requesting the data and the passenger. It would be a similar process to that used by some countries that require electronic visas. The visitor wishing to visit that country goes online and applies for an electronic visa. The process could be adapted to include the questions necessary for contact tracing. In fact, this approach could be a template for a one-window process that could be used for any requirement that the country in question wishes to add. The use of access control levels would allow the information to be distributed or available to departments where it is required whilst providing appropriate protection of confidential data.

The country in question would bear the cost of the system, including the incremental costs associated with collecting additional data and its verification for flight clearance, and the economic drivers would therefore help to limit the collection of unnecessary data. In many of the existing systems, third parties such as airlines bear the cost of data collection and there may be less incentive for countries to limit their requests for data. If desired, the process could easily be extended to the citizens of a country going abroad and returning home. Many countries require advanced information from visitors even where there is no requirement for the passenger to obtain a visa, and this process could similarly be adapted to include contact tracing information. The airlines would continue to help by providing data only available to them, such as seat number and other information relating to the specific journey, as supported by existing UN/EDIFACT standards for Advance Passenger Information (API) messaging.

The proposed system could not only cover all of the requirements of any country, but also has many advantages over the existing systems.

Advantages

- It is a very simple and direct system
- It is an electronic system, which is what all data acquisition experts recommend
- It eliminates the need for a PLF
- It could be used to create a permanent file that can be updated very quickly (a few minutes) for another trip
- It does not make any assumptions
- It provides the best opportunity to obtain accurate information
- It does not rely on the good will of the passengers involved or any other third party

- It is the fastest way to retrieve the data when needed and does not require the involvement of a third party
- It involves only the countries that wish to do contact tracing, putting the onus on them to justify the system
- It limits the cost to those countries that decide to do contact tracing
- It does not interfere with airline operations
- It eliminates the need for harmonization and agreement between countries
- It allows the countries using it to keep the information as long as they want and/or as long as their own legislation will allow it
- It eliminates the transfer of information between third parties

Conclusion

After being involved in many different data collection systems and reviewing others, IATA is convinced that the proposed approach is not only the best one, but is also the most fair to all stakeholders. IATA will continue to help within its means and its responsibilities and would be willing to use its expertise to help any country that wishes to explore this approach.

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