NUMBER: 001/2020
DATE: 10/02/2020

SUBJECT: Operationalization of the Passenger Locator Card (PLC)

KEY WORDS: Health Authority; Passenger Locator Card; dematerialization; passenger; contact tracking; airline carrier

FOR: Airline carriers; ground handling service providers (handler); health authorities; passengers

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The Passenger Locator Card (PLC) or Passenger Locator Card is a document provided for in the international legislation (International Health Regulations, which entered into force on 15 June 2007 and was published by Notice nº 12/2008, in the Diário da República, 1st series, nº 16, of 23 January 2008), in the context of protecting public health, in particular with regard to communicable diseases, allowing to track the contacts of people who may submit positive infection results, through data provided by air passengers.
Personal data provided for this purpose are kept only for the period strictly necessary for this purpose and can only be accessed by the competent health authorities.

Considering the current situation of the COVID-19 pandemic, it is necessary to track the contacts f cases of COVID-19 who traveled by air, in order to promptly interrupt possible chains of transmission. With the increase in air traffic, the use of the PLC has been increasing significantly and, given the volume of these physical documents, with the inherent constraints to its circulation, consultation and destruction, it is convenient and opportune to proceed with its dematerialization, changing the PLC to electronic format (PLCe), wich filling, circulation and processing of data is based on the legal regime for the protection of personal data.
For the operationalization of this dematerialization, the Directorate-General for Health (DGS), the National Civil Aviation Authority (ANAC), the Shared Services of the Ministry of Health (SPMS) and Tourism of Portugal issue the following joint guidance:

Filling in the PLC

1. The passenger is informed of the obligation to complete the PLC before boarding, in several moments:
    a) Through websites and airline carriers service and/or sale points to the public and at international airports and aerodromes;
    b) Upon confirmation of the ticket reservation, by the airline carrier;
    c) Upon electronic or in person check-in, by the airline carrier;
    d) At the points of arrival at the international airport/aerodrome, by the airport's managing entity, through announcements at the airport;
    e) During the flight, by the airline carrier.

2. After check-in, either electronic or in person, the airline carrier provides the passenger with a link to the form page, hosted on the portugalcleanandsafe.com platform, under the responsibility of Turismo de Portugal, where the PLCe will be available (in Portuguese and English versions).

3. After completing and submitting the PLC electronic form, the Turismo de Portugal page presents a printable version to the passenger, recommending that they print or make a screenprint of it, as proof of completion of the PLCe.

4. Once the PLCe form has been successfully submitted, Turismo de Portugal transfers all data on the form to the Directorate-General for Health's database, enabling an additional proof of completion and submission sent to the passenger, by e-mail. Therefore, Turismo de Portugal does not store any data submitted in the PLCe.

5. At the boarding gate, the airline carrier, or the ground handling service provider (handler), checks the completion and submission of the PLCe, through the presentation by the passenger of proof, printed or on mobile device.

6. Passengers who do not present proof of completion of the PLCe at the boarding gate will be asked to fill it in.

7. Passengers who do not present proof of completion of the PLCe and who claim an acceptable reason (technical server failure, lack of internet access, lack of command of the Portuguese or English or info exclusion), the PLC is made available on paper by the airline carrier or by the ground handling service provider.

8. During the flight, the Airline carrier reinforces the disclosure of the mandatory filling of the PLC and provides PLC paper forms to the passenger who has not presented proof of completion of the PLCe, who has alleged one of the acceptable reasons referred to in the previous point.

9. The paper PLC forms are collected by the airline carrier, after filled out by the passengers. The PLCs are placed in a closed envelope, indicating on the outside, the flight number and date and origin of the flight.

10. Upon arrival, the airline carrier delivers the envelope with the paper PLCs to the ground handling services.

11. During the 14 days following each flight, the PLCe data is stored in the Directorate-General for Health's database, which may be consulted by the duly authorized Health Authorities where necessary.

12. Paper PLCs are kept by the ground handling service provider, who has the duty of confidentiality of the data under its responsibility for 14 days following each which shall immediately make them available to the competent Local Health Authority, whenever requested.

13. On the 15th day after the flight, the PLCe data is automatically deleted from the database and the Paper PLCs are destroyed by the ground handling service provider, ensuring that the content becomes unrecognizable.

Performance of Health Authorities

14. During the epidemiological investigation into a COVID-19 case, the Health Authority that checks that there has been travel by air, contacts the Local Health Authority for the international airport or aerodrome, where the citizen with COVID-19 landed, informing the Regional Health Authority, to initiate the procedures necessary to identify the contacts who traveled on the same flight as the COVID-19 case.

15. If the international airport or aerodrome belongs to a different health region, the Local Health Authority responsible for the epidemiological investigation communicates to the Regional Health Authority the need for interection with the Regional Health Authority of the region of the International airport/aerodrome.

16. The Health Authority of the International airport/aerodrome accesses the PLCe database, through the platform created and supported for this purpose by SPMS, and selects the Information to be exported, concerning to the contacts of the COVID-19 case, classified in accordance with DGS Standard no.015/2020.

17. The Health Authority of the International airport/aerodrome contacts the ground handling service provider to ascertain the existence of paper PLCs and obtain access to them, processing data in an analogous way to that used for the PLCe.

18. The Health Authority of the International airport/aerodrome disaggregates the information by region and sends it to the Regional Health Authority.

19. The Regional Health Authority sends the information to the Local Health Authority with jurisdiction in the municipality of residence or destination of the citizen identified as a contact of a COVID-19 case, complying with the contact surveillance procedures established in the DGS Standard No. 015/2020.

20. If the destination of the person identified as a COVID-19 case contact, is in a region other than that of the place of arrival, or if the passenger is in transit, the Regional Health Authority liaises with the Regional Health Authority of the destination, for it to comply to the previous point.

21. Information on passengers who are no longer in national territory is sent by the Regional Health Authority to the DGS Public Health Emergency Center, so that communication with the Health Authorities in other countries is made from the national point of contact for International Health, in compliance with the International Health Regulations.

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