

Covid-19 Vaccination – Privacy Notice

The purpose of this notice

This notice explains how your personal information is processed during the particular circumstances around Covid19 and the Welsh Governments Test, Trace and Protect strategy to reduce the incidence of infection. Vaccination is a fundamental approach to public health practice and forms part of the Protect phase of the government's strategy. This notice specifically explains how we deal with your information for the vaccinations phase. More information can be found here <https://gov.wales/>

What happens – do you need to provide consent?

What happens will depend on the category you fall into, for example, if you are working you may be asked by your employer for your consent to share your information with your local Health Board so that it can invite you for a vaccination. If you fall into a category where you may be classed as a vulnerable person, such as, over 70 or where you are shielding, then you will automatically be invited for a vaccination. This does not mean that you will automatically have the vaccination but you will receive an invitation.

You will be asked to telephone for an appointment at a Health Board site or perhaps there may be a local drop in session at which you may be able to attend. The Health Board will need to collect some clinical information about you such as, whether you have had a flu vaccination or whether you are allergic to some medication. This information and that you had the vaccination will be recorded in your medical record.

Following vaccination your GP and potentially your employer's Occupational Health department will be informed. This will assist with their legal obligations to manage your own and other people's health, well-being and safety. For the same purpose your GP and employer's Occupational Health department may also be informed if you have refused to have the vaccination.

What organisations are collecting and using your personal data?

Depending on where you live your data will be collected and used (called processing) by one or more of the organisations identified below. All these organisations have the status of 'Joint Data Controller', which means that they are responsible in law for the data that they process, in this case, your vaccination. They are all party to an agreement across Wales that sets out how and why they process that information.

- Your employer
- NHS Wales 7 local Health Boards
- Velindre University NHS Trust (through NHS Wales Informatics Service - NWIS)
- Welsh Ambulance Service Trust

What personal data is collected and used?

To assist with the vaccination programme your local Health Board will need to collect personal data. The data it will collect about you will include:

- Full name
- Date of birth
- Gender
- Preferred language
- NHS number (if known)
- Full Address including postcode
- Telephone Number
- Email address
- Preferred communication method
- Disability and ethnicity

Your mobile number will be used to send text reminders and your email will be used as an alternative means to contact you or as the main method if you prefer.

Some of this will be supplied to the Health Board by your employer in order for the Health Board to offer you a vaccination and some will be collected by the Health Board when it speaks to you.

For how long is the personal data kept?

Vaccination, test results and information related to any ongoing conditions related to Covid-19 will remain in your health record in accordance with normal NHS retention schedules.

Is the information used for purposes other than vaccinations?

The information collected by the Health Board may also be used to:

- Understand COVID-19 incidences and trends in order to manage the risks to public health and to control and prevent the spread of COVID-19
- Identifying and understanding information about patients or potential patients with or at risk of COVID-19
- Deliver health and welfare services to citizens across Wales
- Ensuring all staff at all workplaces are safe
- Research and planning in relation to COVID-19 (including potentially being invited to be part of clinical trials)
- Monitoring the progress and development of COVID-19

What is the legal basis for processing your personal data?

In the first instance your employer will need your consent to provide your details to the local Health Board for it to offer you a vaccination.

Once the Health Board has this information or where you are considered a vulnerable person then the legal basis it will use for processing your personal data for vaccination purposes under the General Data Protection Regulation (GDPR) is:

- Article 6(1)(e) – Task carried out in the public interest or in the exercise of official authority vested in the controller (the Health Board)

For special category data an additional legal basis is required and this is:

- Article 9(2)(i) - Processing must be necessary for reasons of public interest in the area of public health (such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices)
- Article 9(2)(h) Provision of preventative or occupational medicine, health or social care or treatment, or the management of health or social care systems

Other applicable legislation

There are several other pieces of legislation which allow and enable the organisations to collect and use your data, some of the main ones are:

- Public Health (Control of Disease) Act 1984
- The Health Service (Control of Patient Information) Regulations 2002
- Coronavirus Act 2020
- The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020

Useful Contacts

You will find details on how the Local Health Board handles all of your information from its own local privacy notices.

You can find contact details for your Local Health Board by visiting

<https://www.wales.nhs.uk/ourservices/directory/LocalHealthBoards>

If you have any concerns or complaints over the handling of your personal data you should in the first instance contact the Data Protection Officer at your Local Health Board.

To contact the Data Protection Officer for Aneurin Bevan Local Health Board please telephone 01495 765325 or email ABB.DPO@wales.nhs.uk

If however you remain unsatisfied you may complain to the Information Commissioner's Officer at:

Information Commissioner's Office – Wales,
2nd Floor, Churchill House,
Churchill Way,
Cardiff
CF10 2HH

Telephone 0330 414 6421 Email: wales@ico.org.uk