

Coronavirus Vaccination Programme – Privacy Information for Health & Care Staff

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Introduction

The Covid-19 vaccination programme in Surrey Heartlands is being rolled out to all health and social care workers who have frequent face-to-face contact with patients and who are directly involved in patient care in either secondary or primary care, mental health, urgent and emergency care and community settings. This includes those working in independent, voluntary and non-standard healthcare settings such as hospices, and community-based mental health or addiction services.

NHS Surrey Heartlands CCG, on behalf of the Local Resilience Forum, have worked with partners to establish a booking system for these individuals to receive vaccinations at various sites within Surrey Heartlands.

Your employer will provide you with information on how to sign up to receive the vaccine and will share relevant information about you with the provider of your local vaccination service to allow you to be invited for vaccination.

When it is the right time for you to receive your vaccination you will receive an invitation to come forward by email, SMS, or telephone.

We know lots of people will be keen to get protected from the virus but we are asking people not to share these vaccination booking details with friends or family as we have a limited number of vaccines to offer and need to ensure these are provided to those providing Health and Care services first. Other people within the community will be contacted directly for their own appointment.

Data Controller

Your employer and the organisation that provides the vaccination to you are joint Data Controllers of the data gathered for the purposes of Data Protection legislation. They decide what personal data is required and how it needs to be used. NHS Surrey Heartlands CCG is a data processor and only acts on the authority of these organisations.

NHS England are the sole data controller for any data that is transferred to them.

To find out more about the National COVID-19 Vaccination Programme visit: <https://www.england.nhs.uk/contact-us/privacy-notice/national-flu-vaccination-programme/>

What personal data we collect

To make a booking for a vaccination the following data relating to you is required:

- Title
- First Name
- Last Name
- NHS Number
- Telephone Number
- Employer / Company Name
- Job Title
- Health Data (e.g. assessment of priority based on vulnerability)

Other information may also be gathered during the vaccination process including:

- GP Practice Name
- Ethnicity
- Additional health data (e.g. details of allergies)

Purposes your information will be used for

Your data will only be used for the following purposes:

- Arranging for you to receive COVID vaccination
- Providing you with a COVID vaccination
- Reporting of COVID vaccinations administered

What types of information we use

To allow us to undertake the activities detailed above we will use different types of information, this includes:

- **Identifiable Personal Data** including:
 - **Personal Data** (for example your name, contact details, or date of birth)
 - **Special Categories of Personal Data** (which includes data relating to ethnicity and data relating to physical health)
- **Non-Identifiable Personal Data** – we could be asked by NHS England to provide summary information, but this will not include your personal details.

Data Processors and other recipients of your data

Organisations who use your data and information on behalf of a Data Controller can only do so with clear instructions from them. They cannot use your data and information for any other purpose.

Any use of information that is not covered by the instructions from the Data Controller would be unlawful, unless the Data Controller agrees and provides written permission to do this.

The Data Controllers have appointed Data Processors, as indicated below, to carry out these activities:

- Suppliers of the ICT systems used to gather data required to arrange for you to receive a vaccination
- Organisations involved in delivery of the vaccinations and management of waiting lists, including NHS Surrey Heartlands CCG

Other recipients of your data may include:

- The Department of Health and Social Care (DHSC)
- NHS England
- NHS Digital
- Your GP Practice

Legal basis

There is a lawful basis under data protection legislation for the processing of your data as the following apply:

- **GDPR Article 6(1)(e)** – the processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a health service
- **GDPR Article 9(2)(h)** – the processing is necessary for health purposes
- **GDPR Article 9(2)(i)** – the processing is necessary for reasons of public interest in the area of public health
- **Data Protection Act 2018** – Schedule 1, Part 1, (2) (2) (f) – health or social care purposes
- **The Common Law Duty of Confidentiality** – this requires that a duty of confidence is applied and that information provided should not be otherwise disclosed without the data subject's consent.

Your rights under Data Protection Act 2018 and GDPR

By law, you have a number of rights as a data subject, such as the right to access information held about you. This vaccination programme does not take away or reduce these rights, so you can still request, for example, copies of the information they hold about you from the organisations named in this notice.

If you are unhappy or wish to complain about how your information is used as part of this programme, you should contact the CCG in the first instance to resolve your issue – please see our [website](#) for further information on how to do this.

However you are entitled to also contact the Information Commissioner's Office (ICO) if you have concerns about the way your information has been used and you can find their contact them by visiting their website www.ico.org.uk or telephoning them on 0303 123 1113.

Retention and storage of your information

The data controllers have instructed the CCG to hold records containing personal data for a limited amount of time and then securely destroys these when they are no longer required. The CCG are required to ensure that records are held in accordance with the guidance and retention schedules included within the [2016 Records Management Code of Practice](#) for Health and Social Care or any successor guidance. Please see our [Records Management Policy](#) for further information.

This means we will keep your personal information for no longer than is required and then it will either be returned to the data controllers or securely deleted.

Information that identifies you will be stored securely, and processed in the UK. Information that does not and cannot identify you may be stored and processed outside of the UK.

Data Protection Officer

Under data protection legislation the data controllers are required to have in place a Data Protection Officer (DPO) and it is their role to:

- Inform and advise the organisation and its employees about their obligations to comply with applicable data protection legislation;
- Support and monitor compliance with applicable data protection legislation;
- Be the first point of contact for individuals whose data is being processed.

Contact details for Data Protection Officers of organisations involved in vaccination programme can be found below:

- Your employer – please refer to your organisation’s core Privacy Notice
- NHS Surrey Heartlands CGG – email syheartlandscgg.informationgovernance@nhs.net
- Central Surrey Health / CSH Surrey – email nelcsu.dpo@nhs.net
- Royal Surrey Hospital - email rsc-tr.InformationGovernance@nhs.net
- Ashford & St. Peter’s Hospitals - email asp-tr.IG@nhs.net
- Epsom and St. Helier Hospitals - email paul.kenny@nhs.net
- Surrey & Sussex Health Care - email sash.data.protection@nhs.net
- GP Practices: East Surrey - email GP-IGEnquiries.scwcsu@nhs.net
- GP Practices: other areas - email ajspinksltd.surreyheartlandsdpo@nhs.net

Changes

We will review the information contained within this notice regularly and update it as required. We therefore recommend that you check the COVID19 related information included on this [webpage](#) regularly to remain informed about the way in which your data is used.

This version was last updated by the CCG's DPO on the 20 January 2021.