

Privacy Notice – COVID-19 vaccinations for individuals

Plain English explanation

Part of the national response to the COVID-19 pandemic is the need to record the details of individuals who have been vaccinated against COVID-19. Vaccinations are normally undertaken in GP practice or community settings. With COVID-19 vaccinations, this will be undertaken in a variety of care settings and for the majority of individuals, vaccinations will be managed by “lead providers” on behalf of local health and care organisations.

Across England, a variety of lead providers and systems are being used to manage the vaccination process. The sharing of this information is necessary to enable the coordinated and effective roll-out of this vaccination programme to individuals across England.

1) Controller contact details	Dr Kulshrestha’s Summerfield Family Practice
2) Data Protection Officer contact details	Umar Sabat, Data Protection Officer sdsmyhealthcare.ig@nhs.net
3) Purpose of the processing	The purpose of the envisaged data flows is to effectively deliver and document the delivery of vaccinations for COVID-19 to patients across the local community.
4) Lawful basis for processing	<p>Under the General Data Protection Regulation (GDPR), the lawful basis for processing this data is found at Articles:</p> <p><i>6(1)(e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,</i></p> <p><i>and</i></p> <p><i>9(2)(h) Processing is necessary for the purposes of the provision of health or social care or treatment.</i></p> <p>The ‘Notice’ issued by the Secretary of State for Health sets aside the requirements of Common Law Duty of Confidentiality for COVID-19 purposes, <i>Regulation 4 Health Service Control of Patient Information Regulations 2002</i> provides that ‘<i>information may be processed in accordance with these Regulations, notwithstanding any common law obligation of confidence</i>’, meaning that identifiable patient data can be shared with other organisations where it is ‘necessary’ for a COVID-19 purpose.</p>
5) Recipient or categories of recipients of the processed data	Health and social care organisations, GPs, Arm’s Length Bodies (such as NHS Digital and Public Health England), local authorities.

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6) Right to access and correct	You have the right to access the data that is being shared and have any inaccuracies corrected. You can exercise this right by contacting the organisation's data protection officer, whose details are listed above. There is no right to have accurate medical records deleted except when ordered by a Court of Law.
8) Retention period	The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016
9) Right to Complain	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ or call their helpline at 0303 123 1113 (local rate) or 01625 545 745 (national rate). There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website).