

Welsh Immunisation System Privacy Notice

The purpose of this notice

The Welsh Immunisation System (WIS) is a central electronic database that enables the accurate and standardised recording of data from all vaccination settings in Wales. It allows for the accurate sharing and recording of patient data with vaccinators.

This notice focuses specifically on WIS, as it contains the personal information of all those to be offered and who receive a vaccination in Wales. WIS has been developed by, and is hosted by, Digital Health and Care Wales (DHCW).

The Welsh Immunisation System (WIS) has and will continue to be used to support various vaccination programmes including (but not exclusive to) COVID-19 vaccination programme, flu vaccination programme, childhood vaccination programmes, school-aged immunisations (ages 4 to 15) and respiratory syncytial virus (RSV) immunisations etc.

Why do you hold my information?

Information is held for the purpose of maintaining vaccination records; this includes singular vaccines or co-vaccination programmes. This includes, but is not limited to, COVID vaccination, flu vaccination programme, childhood vaccination programmes, school-aged immunisations (ages 4 to 15) and respiratory syncytial virus (RSV) immunisations etc.

Use of young persons and children's data

The vaccinations programmes supported by the WIS system include programmes aimed at children and young persons. Therefore, this privacy notice is also applicable to children and young persons.

What personal information do you hold and process about me?

The following data is processed in WIS:

- Full name
- Address, post code and contact information such as your telephone number and email.
- Date of birth
- Sex

- NHS number
- Information about whether you are in a care home or hospital.
- Where applicable, information about your job role; for example, whether you are a health or care worker, or another category of worker that has been prioritised for the purposes of the vaccination programme.
- Disability and ethnicity data
- Records of previous vaccinations and allergies.
- When you were offered a vaccination, whether you took up the invitation and, if you did, when you received the vaccination and which type of vaccine you received.
- Records of the booked vaccination date and time.

How do you get my information?

Your information is derived from existing health and care systems.

Additionally, there are infrequent circumstances in which information may be sought from other sources, for instance during the pandemic, if you worked in a role that has been identified for prioritisation, your employer may have highlighted the requirement to add you to a category that ensures you will be immunised in the first phase of the programme. Local Authorities and other organisations may share with Health Boards information about cohorts of individuals to be offered vaccinations.

How is my information used?

Information in WIS is used to enable vaccination programmes as outlined above. The information contained within WIS may be also written back to GP clinical systems for the purposes of direct care.

Personal data relevant to the vaccination programme may also be processed outside of WIS for legitimate and lawful purposes. For example, Digital Health and Care Wales (DHCW) may use the data for research or reporting purposes, further information about this is detailed below.

Who has access to or information shared with them?

Organisations will only have information shared with them for a legitimate purpose, within the confines of the law and with the relevant technical and security controls in place.

Examples of organisations who may have access to the information include:

- DHCW for the management of the system
- Local Health Boards to co-ordinate vaccination programs
- 'Engaged providers', such as GP surgeries have access to personal data held on WIS in order to deliver vaccinations.
- Other organisations, such as Care Inspectorate Wales have access to WIS to be able to provide up to date information about care homes.
- Local Authorities and other organisations may receive some information about those who have received a vaccination in their locality; for example homeless people.

What is the legal basis for the use of my information?

The relevant provision of the General Data Protection Regulation (UK GDPR) is:

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

For more sensitive data such as health information (known as special category data) an additional legal basis is required and is:

- 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
- 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)

Some vaccine programmes, where applicable, are supported by additional pieces of legislation such as (but not limited to)

- Section 82 of the National Health Service Act 2006 places a duty on NHS bodies and local authorities to co-operate with one another in order to secure and advance the health and welfare of the people of England and Wales.
- The Health Service (Control of Patient Information) Regulations 2002.
- Employers are under an obligation, derived from the Health & Safety at Work Act (1974) to 'protect, so far as reasonably practicable, those at work and others who may be affected by their work activity'.
- The Control of Substances Hazardous to Health (COSHH) Regulations 2002 require employers to assess the risks from exposure to hazardous substances, including pathogens (called biological agents in COSHH), and to bring into effect the measures necessary to protect workers and others from those risks as far as is reasonably practicable. This includes providing immunisations (Regulation 7(6)(f)). (Applies to occupational health vaccination programmes only)

Do you process my data for any other purpose?

Research & Reporting –

Personal data may also be processed by the NHS, Public Health Wales, Welsh Government, Local Authorities, and other organisations commissioned to undertake such work, to produce reports and undertake research. Examples are below:

- To understand the overall impact of the vaccination programme.
- To understand the effectiveness of vaccines.
- Population health monitoring
- To understand how particular groups have been impacted by the programme; for example, uptake of vaccinations and the impact on particular groups.

Where possible data will be anonymous, aggregated data but there may be times when identifiable data is required. Where identifiable data is used it will be in line with legislation and subject to the implementation of rigorous organisational and technical controls.



How long will my information be kept?

Personal data shall be retained in NHS Wales systems and applications in line with the appropriate retention periods applied to the relevant record types.

Retention for personal data processed outside NHS Wales systems and applications will relate to operational records that need to be kept for legal compliance*, or that have a limited life as part of an operational activity. These records will be retained for minimum of seven years (the initial year plus six financial years).

Records may be kept longer for various reasons, example reasons include (but are not exclusive to):

- The record is the subject of live litigation or a request for information. In these circumstances, destruction should be delayed until the litigation is complete or the relevant complaint procedure has been exhausted, at which time a new trigger point and retention period is created.
- The record has long-term value for each controller's statutory functions.
- The record has been or should be selected for permanent preservation.

*the whole or part of the record may be extrapolated in order to preserve health and social care activity as part of a Welsh residents Health & Social Care Record. Retention values in these circumstances will be different from those described for operational use.

What rights do I have in relation to this processing of my information?

The UK General Data Protection Regulation (UK GDPR) provides you with certain rights in respect of your personal data.

For further information relating to your individual rights please see <https://ico.org.uk/for-the-public/>

Please note, not all of these rights are absolute, which means we are often required to balance your wishes against other requirements. For example, it is unlikely that a request from a data subject to delete their entire health record would be agreed.

This is because there are other legal reasons that such records need to be kept. If future treatment is required, the individual could be at risk of harm if information about their medical history is not available. Each request to exercise one of the above rights will be assessed on its merits. Some rights are unlikely to apply in the context of the work we do; for example, the right to erasure and the right to data portability.

To exercise your rights in relation to this processing, please contact the Data Protection Officer in your Local Health Board.

Contact

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.

You have the right to lodge a complaint in relation to this privacy notice or our processing activities with the Information Commissioner's Office, which you can do through the website or their telephone helpline.

<https://ico.org.uk/global/contact-us/>

Information Commissioner's Office – Wales

2nd Floor, Churchill House

Churchill Way

Cardiff

CF10 2HH

Telephone 0330 414 6421

Email: wales@ico.org.uk