Welsh Immunisation System and Vaccine Booking Service 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.

The Vaccine Booking Service (VBS) is a web-based application that enables the booking of immunisations on WIS.

Personal data relevant to the vaccination programme is also processed outside of WIS. For example, Digital Health and Care Wales (DHCW) combines sources of existing data about health and care staff, shielding patients (those people at greater risk of serious illness from COVID-19) and the general population. This has enabled the prioritisation of patients in line with guidance from the Joint Committee on Vaccination and Immunisation (JCVI) and the maintenance of records that show who was vaccinated, when, where and which vaccination was used. The centralised system also ensures a standard approach to recording data, which will enable studies into the effectiveness of the vaccination programme.

This notice focuses specifically on WIS and the VBS, as it contains the personal information of all those to be offered and who receive a vaccination in Wales. A Data Protection Impact Assessment has been completed for WIS and the VBS.

WIS has been developed by, and is hosted by, Digital Health and Care Wales (DHCW), which was previously NHS Wales Informatics Service (NWIS). WIS is based on existing technology; the Child and Young Persons Integrated System (CYPrIS), which is already used as a national childhood immunisation system.

Why do you hold my information?

To be able to deliver a COVID-19 vaccination programme in Wales.

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.
- Information about whether you are a Shielded Patient and the reason why.
- 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.

The following information is processed by the VBS:

- Full name
- Address, post code and contact information such as your telephone number and email.
- Date of birth
- Sex
- NHS number
- Records of previous vaccinations
- Records of the booked vaccination date and time.

How do you get my information?

Your information is derived from existing health and care systems. If you work in a role that has been identified for prioritisation, your employer will 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. The JCVI may revise the agreed priority groups for vaccination from time to time and so local authorities will be required to share information on their residents in order to assist with the vaccination planning. This will include vulnerable groups for example members of the traveller community or individuals who are homeless in their area.

How is my information used?

The vaccination programme in Wales is being coordinated by Local Health Boards but various organisations provide, receive and have access to information:

- DHCW hosts and manages WIS and the VBS and acts is a Controller in conjunction with the Local Health Boards in Wales.
- Appointment choices will be shared with the relevant health organisation and vaccination centre.
- Local Health Boards have access to the personal data held on WIS to co-ordinate the vaccination programme in their area.
- NHS Trusts, Local Authorities, GP surgeries, pharmacies, dental practices and other health and care providers provide information about staff to be offered a vaccination.
- Care homes provide, via Local Authorities, information about residents to be offered a vaccination.
- '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.
- Invitations to vaccination appointments are sent using an existing service called Gov.UK Notify.
- Others who need to verify your vaccination status may need to access your information. For example, if you come into contact with someone who has tested positive for COVID-19, contact tracers may access your information to ensure you are provided with appropriate information about any requirement to self-isolate

VBS and the NHS Login

When you are invited for a vaccination you may decide to use the Vaccination Booking App. Please note that if you access the VBS using your NHS login details, the identity verification services are managed by NHS Digital. NHS Digital is the controller for any personal information you provided to NHS Digital to get an NHS login account and verify your identity, and uses that personal information solely for that single purpose. For this personal information, DHCW's role is a "processor" only and we must act under the instructions provided by NHS Digital (as the "controller") when verifying your identity. To see NHS Digital's Privacy Notice and Terms and Conditions, please click here. This restriction does not apply to the personal information you provide to us separately.

Further information about the role of NHS Digital in providing this verification service is available through its privacy notice and terms and conditions:

Your Privacy on NHS login

Terms and conditions (login.nhs.uk)

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)

This is supported by the following legislation:

Patient information

- 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.

Employee information

- 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)).

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.
- 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.

Is my personal information shared with any other organisation?

The primary purpose of processing your personal data is to deliver the vaccination programme and to understand its impact. A wide range of organisations are involved and, as previous described, there may be times when organisation are asked to undertake analysis of the data for the purposes of reporting or research. Access to the system is controlled and user activity is auditable.

We do not share your data with agencies not involved in the vaccination programme, or the response to the Covid-19 pandemic (e.g. Immigration agencies).

Further information about how your information will be used if you request a vaccination status statement can be accessed on Welsh Government's website. **COVID-19 vaccination status statement service: privacy notice | GOV.WALES**

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 current year plus six financial years).

Records may be kept longer if :

- 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.

Click **here** for further information relating to your individual rights.

To exercise your Rights to Restriction and Erasure 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.

If however you remain dissatisfied you may complain to the Information Commissioner's Officer at the following address

Information Commissioner's Office – Wales

2nd Floor, Churchill House

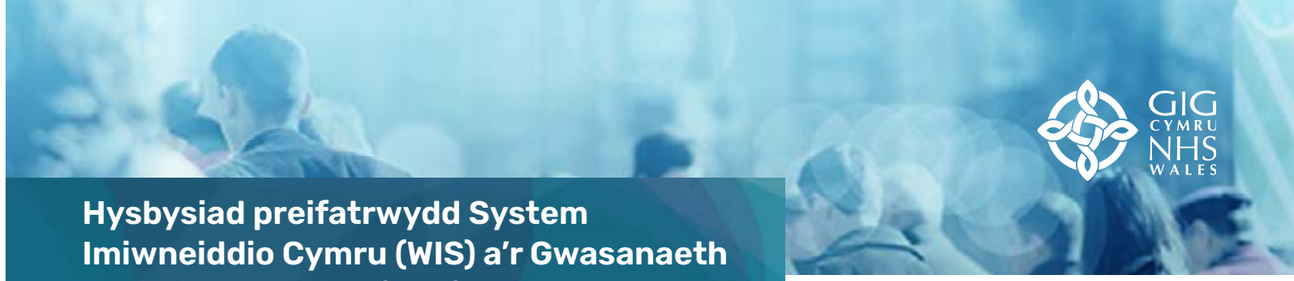
Churchill Way

Cardiff

CF10 2HH

Telephone 0330 414 6421

Email: **wales@ico.org.uk**



Hysbysiad preifatrwydd System Imiwneiddio Cymru (WIS) a'r Gwasanaeth Archebu Brechlyn (VBS)

Diben yr hysbysiad hwn

Mae System Imiwneiddio Cymru (WIS) yn gronfa ddata electronig ganolog sy'n galluogi cofnodi data yn gywir ac yn safonol o bob lleoliad brechu yng Nghymru. Mae'n caniatáu rhannu a chofnodi data cleifion yn gywir gyda brechlynnau.

Mae'r Gwasanaeth Archebu Brechlyn yn gymhwysiad ar y we sy'n galluogi pobl i archebu brechiadau ar WIS.

Mae data personol sy'n berthnasol i'r rhaglen frechu hefyd yn cael ei brosesu y tu allan i WIS. Er enghraifft, mae Gwasanaeth Gwybodeg GIG Cymru yn cyfuno ffynonellau data sy'n bodoli eisoes am staff iechyd a gofal, cleifion sy'n cysgodi (y bobl hynny sydd mewn mwy o berygl o salwch difrifol o COVID-19) a'r boblogaeth gyffredinol. Mae hyn wedi galluogi blaenoriaethu cleifion yn unol â chanllawiau gan y Cyd-bwyllgor ar Imiwneiddio a Brechu (JCVI) a chadw cofnodion sy'n dangos pwy gafodd frechiad, pryd, ble a pha frechiad a ddefnyddiwyd. Mae'r system ganolog hefyd yn sicrhau dull safonol o gofnodi data, a fydd yn galluogi astudiaethau i effeithiolrwydd y rhaglen frechu.

Mae'r hysbysiad hwn yn canolbwyntio'n benodol ar WIS a VBS, gan ei fod yn cynnwys gwybodaeth bersonol pawb a fydd yn cael cynnig brechiad a phawb sy'n cael brechiad yng Nghymru. Mae Asesiad o'r Effaith ar Ddiogelu Data wedi'i gwblhau ar gyfer WIS a'r VBS.

Mae'r hysbysiad hwn yn canolbwyntio'n benodol ar WIS, gan ei fod yn cynnwys gwybodaeth bersonol pawb a fydd yn cael cynnig ac yn derbyn brechiad yng Nghymru. Mae Asesiad o'r Effaith ar Ddiogelu Data wedi'i gwblhau ar gyfer WIS.

Mae WIS wedi'i ddatblygu, ac yn cael ei gynnal gan Iechyd a Gofal Digidol Cymru (DHCW), sef Gwasanaeth Gwybodeg GIG Cymru (NWIS) yn flaenorol. Mae WIS yn seiliedig ar dechnoleg sy'n bodoli eisoes; y System Integredig Plant a Phobl Ifanc (CYPrIS), sydd eisoes yn cael ei defnyddio fel system imiwneiddio plant genedlaethol.

Pam ydych chi'n cadw fy ngwybodaeth?

Er mwyn gallu darparu rhaglen frechu COVID-19 yng Nghymru.

Pa wybodaeth bersonol amdanaf ydych chi'n ei chadw a'i phrosesu?

Prosesir y data canlynol yn WIS:

- Enw llawn
- Cyfeiriad, cod post a manylion cyswllt megis eich rhif ffôn a'ch cyfeiriad e-bost.
- Dyddiad geni
- Rhyw
- Rhif GIG
- Gwybodaeth ynghylch p'un a ydych mewn cartref gofal neu ysbyty.
- Gwybodaeth ynghylch a ydych chi'n Glaf a Warchodir a'r rheswm pam.
- Gwybodaeth am eich swydd; er enghraifft, p'un a ydych chi'n weithiwr iechyd neu ofal, neu'n gategori arall o weithiwr sydd wedi'i flaenoriaethu at ddibenion y rhaglen frechu.
- Data ar anabledd ac ethnigrwydd
- Cofnod o frechiadau blaenorol ac alergeddau.
- Pryd gawsoch gynnig brechiad, p'un a dderbynioch chi'r gwahoddiad ai peidio ac, os gwnaethoch hynny, pryd y cawsoch chi'r brechiad a pha fath o frechlyn a gawsoch chi.

Mae'r wybodaeth ganlynol yn cael ei phrosesu gan y VBS:

- Enw llawn
- Cyfeiriad, cod post a manylion cyswllt megis eich rhif ffôn a'ch cyfeiriad e-bost.
- Dyddiad geni
- Rhyw
- Rhif GIG
- Cofnodion o'ch brechiadau blaenorol
- Cofnodion o ddyddiad ac amser eich brechiad a archebwyd.

Sut ydych chi'n cael fy ngwybodaeth i?

Mae eich gwybodaeth yn deillio o systemau iechyd a gofal sy'n bodoli eisoes. Os ydych chi'n gweithio mewn swydd sydd wedi'i nodi ar gyfer ei blaenoriaethu, bydd eich cyflogwr wedi tynnu sylw at y gofyniad i'ch ychwanegu at gategori sy'n sicrhau y byddwch chi'n cael eich imiwneiddio yng ngham cyntaf y rhaglen. Efallai y bydd Awdurdodau Lleol a sefydliadau eraill yn rhannu gwybodaeth â Byrddau Iechyd am garfanau o unigolion y dylid cynnig brechlyn iddynt. Gall y Cyd-bwyllgor ar Imiwneiddio a Brechu adolygu'r grwpiau blaenoriaeth y cytunwyd arnynt i'w brechu o bryd i'w gilydd ac felly bydd yn ofynnol i awdurdodau lleol rannu gwybodaeth am eu trigolion er mwyn cynorthwyo gyda'r gwaith o gynllunio brechu. Bydd hyn yn cynnwys grwpiau bregus er enghraifft aelodau o'r gymuned teithwyr neu unigolion sy'n ddigartref yn eu hardal.

Sut y defnyddir fy ngwybodaeth?

Cydlynir y rhaglen frechu yng Nghymru gan Fyrddau Iechyd Lleol, ond mae amrywiol sefydliadau yn darparu, yn derbyn ac yn gallu cael mynediad at wybodaeth:

- Mae Iechyd a Gofal Digidol Cymru yn lletya ac yn rheoli WIS a'r VBS ac yn gweithredu fel prosesydd/rheolydd data ar y cyd â'r Byrddau Iechyd Lleol yng Nghymru.
- Bydd dewisiadau apwyntiadau yn cael eu rhannu â'r sefydliad iechyd a'r ganolfan frechu berthnasol.
- Mae DHCW yn cynnal ac yn rheoli WIS ac yn gweithredu fel prosesydd data i Fyrddau Iechyd Lleol yng Nghymru.
- Mae gan Fyrddau Iechyd Lleol fynediad at ddata personol sy'n cael ei ddal gan WIS er mwyn cydlynu'r rhaglen frechu yn eu hardal.
- Mae Ymddiriedolaethau'r GIG, Awdurdodau Lleol, meddygfeydd, fferyllfeydd, practisau deintyddol a darparwyr iechyd a gofal eraill yn rhoi gwybodaeth am staff a fydd yn cael cynnig brechiad.
- Mae cartrefi gofal yn darparu, drwy Awdurdodau Lleol, wybodaeth am drigolion a fydd yn cael cynnig brechiad.
- Mae gan 'ddarparwyr ymgysylltiedig', fel meddygfeydd, fynediad at ddata personol sy'n cael ei ddal ar WIS er mwyn rhoi brechlynnau.
- Mae gan sefydliadau eraill, fel Arolygiaeth Gofal Cymru, fynediad i WIS er mwyn gallu darparu'r wybodaeth ddiweddaraf am gartrefi gofal.
- Efallai y bydd Awdurdodau Lleol a sefydliadau eraill yn cael rhywfaint o wybodaeth am y rhai sydd wedi derbyn brechiad yn eu hardal: er enghraifft, pobl ddigartref.
- Anfonir gwahoddiadau i apwyntiadau brechu drwy ddefnyddio gwasanaeth sy'n bodol eisoes o'r enw Gov.UK Notify.

Mewngofnodi i'r VBS a'r GIG

Pan fyddwch yn cael eich gwahodd i gael eich brechiad, mae'n bosibl y byddwch yn penderfynu defnyddio'r Ap Archebu Brechiadau. Nodwch, os byddwch yn defnyddio'r VBS gan ddefnyddio eich manylion mewngofnodi i'r GIG, fod y gwasanaethau dilysu hunaniaeth yn cael eu rheoli gan NHS Digital. NHS Digital yw'r rheolydd ar gyfer unrhyw wybodaeth bersonol a ddarparwyd gennych i NHS Digital i gael cyfrif mewngofnodi i'r GIG a gwirio pwy ydych chi, ac mae'n defnyddio'r wybodaeth bersonol honno at y diben hwnnw yn unig. Ar gyfer yr wybodaeth bersonol hon, rôl Iechyd a Gofal Digidol Cymru yw bod yn "brosesydd" yn unig a rhaid i ni weithredu o dan y cyfarwyddiadau a ddarperir gan NHS Digital (fel y "rheolydd") wrth ddilysu eich hunaniaeth. Nid yw'r cyfyngiad hwn yn berthnasol i'r wybodaeth bersonol a roddwch i ni ar wahân.

Mae rhagor o wybodaeth am rôl NHS Digital wrth ddarparu'r gwasanaeth dilysu hwn ar gael drwy ei hysbysiad preifatrwydd a'i delerau ac amodau:

Eich Preifatrwydd wrth ichi fewngofnodi i'r GIG

Telerau ac amodau (login.nhs.uk)

Beth yw'r sail gyfreithiol ar gyfer defnyddio fy ngwybodaeth?

Darpariaeth berthnasol y Rheoliad Cyffredinol ar Ddiogelu Data (GDPR y DU) yw:

- Erthygl 6(1)(e) – Tasg a gyflawnir er budd y cyhoedd neu wrth arfer awdurdod swyddogol a ymddiriedir yn y rheolydd
- Ar gyfer data mwy sensitif megis gwybodaeth iechyd (a elwir yn ddata categori arbennig) mae angen sail gyfreithiol ychwanegol, sef:
- Erthygl 9(2)(i) – Rhaid i brosesu fod yn angenrheidiol am resymau lles y cyhoedd ym maes iechyd y cyhoedd (fel amddiffyn rhag bygythiadau trawsffiniol difrifol i iechyd neu sicrhau safonau uchel o ansawdd a diogelwch gofal iechyd ac o gynhyrchion meddyginiaethol neu ddyfeisiau meddygol)

Cefnogir hyn gan y ddeddfwriaeth ganlynol:

Gwybodaeth cleifion

- Mae Adran 82 o Ddeddf y Gwasanaeth Iechyd Gwladol 2006 yn gosod dyletswydd ar gyrff y GIG ac awdurdodau lleol i gydweithredu â'i gilydd er mwyn sicrhau a hyrwyddo iechyd a llesiant pobl Cymru a Lloegr.
- Rheoliadau'r Gwasanaeth Iechyd (Rheoli Gwybodaeth am Gleifion) 2002.

Gwybodaeth i gyflogeion

- Mae cyflogwyr o dan rwymedigaeth, sy'n deillio o Ddeddf Iechyd a Diogelwch yn y Gwaith (1974) i 'ddiogelu, cyn belled ag y bo'n rhesymol ymarferol, y rhai yn y gwaith ac eraill y gallai eu gweithgarwch gwaith effeithio arnynt'.
- Mae Rheoliadau Rheoli Sylweddau Peryglus i Iechyd (COSHH) 2002 yn ei gwneud yn ofynnol i gyflogwyr asesu'r risgiau o amlygiad i sylweddau peryglus, gan gynnwys pathogenau (a elwir yn asiantau biolegol yn COSHH), ac i roi'r mesurau angenrheidiol ar waith i amddiffyn gweithwyr ac eraill rhag y risgiau hynny cyn belled ag y bo'n rhesymol ymarferol. Mae hyn yn cynnwys darparu brechiadau (Rheoliad 7(6)(f)).

A ydych chi'n prosesu fy nata at unrhyw ddiben eraill?

Ymchwil ac Adrodd –

Gall data personol hefyd gael ei brosesu gan y GIG, Iechyd Cyhoeddus Cymru, Llywodraeth Cymru, Awdurdodau Lleol, a sefydliadau eraill a gomisiynir i wneud gwaith o'r fath, i gynhyrchu adroddiadau a gwneud gwaith ymchwil. Gweler yr enghreifftiau isod:

- I ddeall effaith gyffredinol y rhaglen frechu.
- I ddeall effeithiolrwydd brechlynnau.
- I ddeall sut mae'r rhaglen wedi effeithio ar grwpiau penodol; er enghraifft, y nifer sy'n manteisio ar frechiadau a'r effaith ar grwpiau penodol.

Lle y bo'n bosibl, bydd y data'n ddienw ac wedi'i agregu, ond efallai y bydd adegau pan fydd angen data adnabyddadwy.

A yw fy ngwybodaeth bersonol yn cael ei rhannu ag unrhyw sefydliad arall?

Prif ddiben prosesu eich data personol yw i ddarparu'r rhaglen frechu ac i ddeall ei heffaith. Mae ystod eang o sefydliadau'n cymryd rhan ac, fel y disgrifiwyd eisoes; fe all fod adegau pan ofynnir i'r sefydliad gynnal dadansoddiad o'r data at ddibenion adrodd neu ymchwil. Rheolir mynediad i'r system ac mae gweithgarwch defnyddwyr yn archwiliadwy.

Am ba hyd y bydd fy ngwybodaeth yn cael ei chadw?

Rhaid cadw data personol yn systemau a chymwysiadau GIG Cymru yn unol â'r cyfnodau cadw priodol a gymhwysir i'r mathau perthnasol o gofnodion.

Bydd cadw data personol a brosesir y tu allan i systemau a chymwysiadau GIG Cymru yn ymwneud â chofnodion gweithredol y mae angen eu cadw ar gyfer cydymffurfiad cyfreithiol*, neu sydd ag oes gyfyngedig fel rhan o weithgaredd gweithredol. Bydd y cofnodion hyn yn cael eu cadw am o leiaf saith mlynedd (y flwyddyn gyfredol ynghyd â chwe mlynedd ariannol).

Gellir cadw cofnodion yn hirach:

- Osw'r cofnod yn destun ymgyfreitha byw neu'n gais am wybodaeth. Yn yr amgylchiadau hyn, ni ddylid ei waredu nes bod yr ymgyfreitha wedi'i gwblhau neu nes bod y weithdrefn gwyno berthnasol wedi'i disbyddu, ac ar yr adeg honno, bydd pwynt sbarduno a chyfnod cadw newydd yn cael eu creu.
- Os oes gan y cofnod werth tymor hir ar gyfer swyddogaethau statudol pob rheolydd.
- Os yw'r cofnod wedi'i ddewis neu y dylid ei ddewis ar gyfer ei gadw'n barhaol.

*gellir allosod y cofnod cyfan neu ran ohono er mwyn cadw gweithgarwch iechyd a gofal cymdeithasol fel rhan o Gofnod Iechyd a Gofal Cymdeithasol preswylydd yng Nghymru. Bydd y cyfnod cadw o dan yr amgylchiadau hyn yn wahanol i'r rhai a ddisgrifir at ddefnydd gweithredol.

Pa hawliau sydd gennyf mewn perthynas â'r prosesu hwn o fy ngwybodaeth?

Mae'r Rheoliad Cyffredinol ar Ddiogelu Data (GDPR y DU) yn darparu rhai hawliau i chi o ran eich data eich hun.

Cliciwch **yma** i gael mwy o wybodaeth yn ymwneud â'ch hawliau unigol.

I arfer eich Hawliau i Gyfyngu a Dileu, cysylltwch â'r Swyddog Diogelu Data yn eich bwrdd iechyd lleol.

Cyswllt

Os oes gennych unrhyw bryderon neu gwynion ynghylch y modd yr ymdriniwyd â'ch data personol, dylech gysylltu â'r Swyddog Diogelu Data yn eich Bwrdd Iechyd Lleol yn y lle cyntaf.

Fodd bynnag, os ydych yn parhau i fod yn anfodlon, gallwch gwyno i Swyddfa'r Comisiynydd Gwybodaeth trwy ddefnyddio'r cyfeiriad canlynol:

Swyddfa'r Comisiynydd Gwybodaeth – Cymru

Yr Ail Lawr, Tŷ Churchill,

Ffordd Churchill,

Caerdydd

CF10 2HH

Ffôn 0330 414 6421

E-bost: **wales@ico.org.uk**