

Fair Processing Notice – COVID-19 Vaccination Programme

The purpose of the COVID-19 Vaccination Programme is to offer a vaccine to Bailiwick residents which is designed to minimise the effects of the Coronavirus. The Programme will be delivered to Bailiwick residents on a priority assessment basis and is expected to be rolled out between December 2020 and April 2021.

1. The Data Protection Law

This notice is designed to provide all of the necessary information in relation to how personal data will be processed in line with the Programme. The general principles of processing are listed below and the rights of a data subject can be found by visiting www.gov.gg/DP.

2. The Principles of Processing

a. Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly and in a transparent manner.

It is acknowledged that all processing must be lawful, fair and must be undertaken with transparency. The table (Appendix A) explains all of the processing that is being undertaken for the purpose of delivering the COVID-19 Vaccination Programme. The table lists the relevant personal data that is required in order to deliver the Programme, the table also explains the subsequent processing that is taking place in respect of the data as well as providing the lawful basis which allows the processing to take place.

b. Purpose limitation

Personal data must not be collected except for a specific, explicit and legitimate purpose and, once collected, must not be further processed in a manner incompatible with the purpose for which it was collected.

It is acknowledged that personal data must not be further processed in a way which is incompatible to its original reason for processing. Therefore, the personal data collected as specified in Appendix A, will not be further processed unless the controller is required to do so by law. Additionally, the personal data will not be transferred to a recipient outside of the EU (unless that jurisdiction has been authorized by the EU with respect to its data protection provision).

c. Minimisation

Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.

Appendix A lists the personal data that will be processed in relation to the Programme. There will be no additional personal data that will be processed in this regard, unless the controller is required to do so by law.

d. Accuracy

Personal data processed must be accurate, kept up-to-date (where applicable) and reasonable steps must be taken to ensure that personal data that is inaccurate is erased or corrected without delay.

All personal data will be kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay.

e. Storage limitation

Personal data must not be kept in a form that permits identification of a data subject for any longer than is necessary for the purpose for which it is processed.

Personal data held within the COVID-19 Vaccination Programme database will be retained for a period of one year before the data is reviewed for ongoing relevance. Personal data collected from data subjects who are given the vaccine will form part of their patient record held by their registered GP Surgery. This data will be retained in accordance with the retention and disposal policy of the respective GP surgeries.

f. Integrity and confidentiality

Personal data must be processed in a manner that ensures its appropriate security, including protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Data is protected by the implementation of the SoG's Information Access where access to electronic or paper records is tightly controlled. Employees are vetted in a manner commensurate with the role that they are expected to undertake. Protocols are followed to ensure that employees only have access to areas and documents as required to undertake their role. Access is monitored and effectively managed.

Secured Premises & Filing – the SoG have restricted premises which employees are required to use key cards to access in order to safeguard information from the public. Secure filing cabinets and draws are also provided for additional storage and security.

Staff involved in the Programme are required to sign an additional confidentiality clause in relation to personal data access as part of the Programme.

g. Accountability

The controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

3. Contact Details

The contact details of the relevant controllers are as follows:

The Committee for Health & Social Care

Tel: 01481 725241

Email: healthandsocialcare@gov.gg

The contact details for the Data Protection Officer of Health & Social Care are as follows:

Data Protection Officer, the Committee *for* Health & Social Care

Tel: 01481 717297

Email: data.protection@gov.gg

Controller and processing activity	Personal data	Data sharing	Purpose of processing	Lawful basis for processing
<p>Controller: Policy & Resources and HSC</p> <p>Processing activity: Personal data relating to all HSC employees collated by Occupational Health and uploaded to the COVID-19 Vaccination Database in order to offer the vaccination to all HSC staff. Vaccination to be administered by Occupational Health staff, who will access the MVC database. Data will then be processed to send letters out offering the vaccine.</p>	<p>Basic data: Patient number, full name, gender, address, date of birth and GP practice.</p> <p>Special Category Data: Information relating to last flu jab received and ethnicity.</p>	P&R to HSC.	To contact HSC staff in order to offer the vaccination.	The processing is necessary for reasons of public health, for example – to ensure high standard of quality and safety for health care, medicinal products or medical devices and is carried out with appropriate safeguards for the significant interests of data subjects.
<p>Controller: Primary Care and HSC</p> <p>Processing activity: Personal data held by Primary Care in respect of residents over the age of 80 and adults aged 40-65 years of age (assessed as high risk) will be exported to the MVC database. Data will then be processed to send letters out offering the vaccine.</p>	<p>Basic data: Patient number, full name, gender, address, date of birth and GP practice.</p> <p>Special Category Data: Information relating to last flu jab received and ethnicity.</p>	Primary Care to HSC.	To contact residents over the age of 80 and residents aged 40-65 (assessed as high risk) in order to offer the vaccination.	As above.

Controller and processing activity	Personal data	Data sharing	Purpose of processing	Lawful basis for processing
<p>Controller: Primary Care and HSC</p> <p>Processing activity: Personal data relating to residents aged 65-79 exported from Primary Care to the MVC database Personal data relating to residents aged 40-65 (assessed as moderate risk) to be exported . Data will then be processed to send letters out offering the vaccine.</p>	<p>Basic data: Patient number, full name, gender, address, date of birth and GP practice.</p> <p>Special Category Data: Information relating to last flu jab received and ethnicity.</p>	<p>Primary Care to HSC.</p>	<p>To contact residents between the age of 65 and 79 as well as residents aged 40-65 (assessed as moderate risk) in order to offer the vaccination.</p>	<p>As above.</p>
<p>Controller: Primary Care and HSC</p> <p>Processing activity: Personal data relating to residents aged 50-64 (not assessed as high or moderate risk) exported from Primary Care to MVC database. Data will then be processed to send letters out offering the vaccine.</p>	<p>Basic data: Patient number, full name, gender, address, date of birth and GP practice.</p> <p>Special Category Data: Information relating to last flu jab received and ethnicity.</p>	<p>Primary Care to HSC.</p>	<p>To contact residents between the age of 50 and 64 (not assessed as high or moderate risk) in order to offer the vaccination.</p>	<p>As above.</p>

Controller and processing activity	Personal data	Data sharing	Purpose of processing	Lawful basis for processing
<p>Controller: HSC</p> <p>Processing activity: Personal data to be collected from individuals consenting to be given the vaccine. This data will be stored on the MVC database and will be shared back with Primary Care (GP surgery relevant to each individual).</p>	<p>Basic data: Which arm the vaccine was delivered to and GP name.</p> <p>Special Category Data: Pre-existing and relevant health conditions, date and time vaccinated, batch number and expiry date.</p>	<p>HSC to Primary Care.</p>	<p>To ensure HSC/Primary Care records are kept up-to-date in terms of the vaccine.</p>	<p>The processing is necessary for a health or social care purpose.</p>
<p>Controller: HSC and the UK Medicines and Healthcare products Regulatory Agency (MHRA)</p> <p>Processing activity: Personal data to be shared with the MHRA in order to report on any adverse effects individuals experience after having the vaccine.</p>	<p>Basic data: Patient number, age and gender.</p> <p>Special Category Data: Adverse effects experienced.</p>	<p>HSC to MHRA.</p>	<p>To report to the MHRA on any adverse effects of the vaccine as per legal requirements.</p>	<p>The processing is necessary for the controller to exercise any right or power, or perform or comply with any duty, conferred or imposed on the controller by an enactment.</p>

Controller and processing activity	Personal data	Data sharing	Purpose of processing	Lawful basis for processing
<p>Controller: HSC, P&R and Law Enforcement</p> <p>Processing activity: Interface and subsequent data sharing between vaccination programme and track & trace data.</p>	<p>Basic data: Patient number, full name, gender, address, date of birth and GP practice.</p> <p>Special Category Data: Date and time vaccinated, batch number and expiry date.</p>	<p>Data sharing between HSC, P&R and Law Enforcement.</p>	<p>To inform decision making in terms of travel and isolation.</p>	<p>The processing is necessary for reasons of public health, for example – to ensure high standard of quality and safety for health care, medicinal products or medical devices and is carried out with appropriate safeguards for the significant interests of data subjects.</p>