

Shortened Data Protection Impact Assessment for COVID-19 Project use

It is a requirement of the General Data Protection Regulations that all new systems, processes or services have a DPIA conducted prior to go-live to ensure due consideration of data protection by design and default. During the period under which organisations are responding to the COVID-19 pandemic, this short form can be used to capture key elements of the project or system being implemented, **after which a retrospective full DPIA must be completed.**

This questionnaire will still be reviewed by the relevant stakeholders and will be signed off by the **SIRO and Caldicott** and sent to the Data Protection Officer to ensure that the DPIA log is continually updated.

Project/Service Lead contact details

Senior Responsible Officer for the Project (name, job title, email address, contact details)

Gail Locock, Director of Nursing and Quality

Purpose of the Project/Service

Project/Service Name: Vaccinations for COVID-19 for NHS patients on EMIS system only (Applies to Vaccination Centres and PCNs/GPs only)

With the availability of a vaccine for COVID-19, there is a need to coordinate vaccination for the population of England. This will be coordinated via NHS England who have established a centralised service for the management of both the COVID-19 and seasonal flu vaccination programmes. This service is supported by a central system, the National Immunisation Management System (NIMS) who will share information via Pinnacle Outcomes 4 health.

The key functions of this system are to enable identification of priority groups, to send invitations to book appointments for vaccination, to manage and monitor the progress of the programme.

In summary, the system works as follows:

Loading personal information about people in England

The demographic details of everyone resident in England or registered with a GP in England are imported into the system from the Primary Care Registration Management Service operated by NHS Digital on behalf of NHS England. After an initial load from NHS Digital, the data is kept up to date overnight from EMIS.

Information about patients who are particularly susceptible to the flu because of their health condition or because they are pregnant is also uploaded into the system from data held by NHS Digital.

Further data such as lists of shielded patients, NHS staff and social care workers and ethnic category information are also uploaded. This data can then be used for prioritising invitation for flu or COVID-19 vaccination, and for reporting purposes.

Selecting people to invite for immunisation

The system has an interactive dashboard which will allow NHS England to select groups of people to invite for immunisation. Factors such as age, ethnic origin, gender and underlying health conditions can be applied. They can also select NHS staff and social care workers.

The system shows how many people will be invited if the selected criteria are used. The analysis will include a full geographical breakdown so PCN's can ensure there are sufficient vaccinations and delivery capacity to meet demand. People already vaccinated will be excluded automatically so they are not invited again.

The system sends invitation letters to the people selected.

Sending invitations for vaccination

The list of people to be invited to book an appointment is sent to the mailing service and the National Booking

System. The mailing service prints the invitation letters, which explain how to book an appointment for vaccination.

The system keeps a record of everyone who has been invited and sends reminders via text or letter to anyone who has not been vaccinated, or who has not booked an appointment through the National Booking System.

Informing GPs/ PCN's

The system sends daily updates to EMIS to allow them to update their local record and monitor progress for their patients.

Statistics

The system includes a business intelligence tool which provides comprehensive analysis of how the vaccination programmes are progressing, nationally and locally.

Data collection and reporting

Patients will attend the appointment where Pinnacle will complete pre-vaccination documentation, verifying the patient against the PDS and obtaining consent to vaccinate. Pinnacle integrates with NIMS at this point, which will bring up the patient's vaccination status for both flu and COVID-19. The patient will also be asked if they consent to receive the patient information leaflet via email (recorded on Pinnacle); if no email is provided, the patient will be given a hard copy leaflet at the time of vaccination.

The vaccinator will then see the patient and update Pinnacle with name of person who has drawn up the vaccine and the vaccinator name. A barcode scan of the vaccine will populate Pinnacle with details of the vaccine event (vaccine information, expiry date, batch numbers, time and advice given). The vaccine is delivered, and the record saved, thus updating NIMS and EMIS (within 24 hours).

Pinnacle is accessed via the internet and does not need to link via the PCN networks.

If there are any issues arising from the vaccination for the patients, this information will be entered into Pinnacle and reported via the Yellow Card Scheme (details of process to be confirmed from Pinnacle).

Further information about Pinnacle, including FAQs, is available at:

<https://outcomes4health.org/o4h/help/home?covid>

Categories of personal data and sources

The IMS obtains:

- names
- addresses
- telephone
- numbers
- other personal details
- GP registration information from the Primary Care Registration Management service that NHS Digital manages as a processor for NHS England.
- It receives information about health conditions and other factors that can make people vulnerable to the flu from NHS Digital who collect it from GP Practices, acting under directions from the Secretary of State for Health and Social Care. We also obtain information about ethnic category from NHS Digital.

It receives information about vaccinations given from GP Practices, pharmacies and other vaccination centres. This is so that they can send out reminder letters, inform GPs for them to update their records, and monitor the progress of the vaccination programme.

The data collection and reporting system receives information about vaccination decisions – given or not given. It

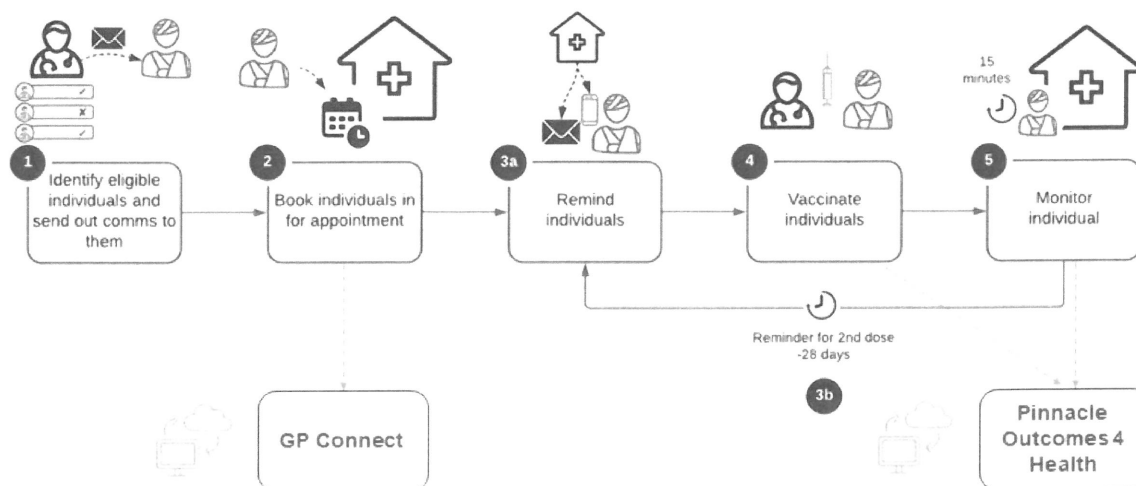
also includes demographic data about NHS staff from the NHS Electronic Staff Record, obtains NHS Numbers traced from the Primary Care Registration Management service

Categories of recipients

The system sends lists of people to be invited for vaccination to the mailing service and the National Booking Service managed by NHS Digital.

The system sends information to GP Practices so that they can update their records about vaccinations that their patients have received at pharmacies or other vaccination centres.

The system sends personal data to the NHS England COVID-19 datastore, and to Public Health England.



Legal basis for processing

The lawful bases under GDPR for establishing this system and processes are:

Article 6(1)(c) processing is necessary for compliance with a legal obligation to which the controller is subject (with regard to the COPI notice)

Article 6(1)(e) (with regard to the Secretary of State for Health and Social Care's public health functions under the NHS Act 2006)

Article 9(2)(h) (the processing is necessary for health or social care purposes); and

Article 9(2)(i) (with regard to public health functions under Regulation 3(1) of the Health Service Control of Patient Information) Regulations 2002.

Guidance available on:

<https://digital.nhs.uk/services/gp-connect/support-for-the-covid-19-vaccination>

<https://www.england.nhs.uk/contact-us/privacy-notice/national-flu-vaccination-programme/>

<https://www.nhs.uk/information-governance/guidance/flu-vaccines-and-covid-19-response/>

Copy of the Pinnacle health care agreement



Pinnacle health
agreement.pdf

Name of system /application being used:

Details of the system/ application in use elsewhere within UK:

Pinnacle is being rolled out as the national patient vaccination system (in non-acute settings) by NHS England and NHS Digital.

The booking systems have been procured locally via the agreed procurement framework.

Risk assessment and mitigation

Are there any risks to the **Confidentiality** of personal data? *Confidentiality is defined as unauthorised disclosure of, or access to, personal data.*

Each practice will sign a Data processing agreement with Pinnacle Health Partnership limited who have a contact with IMS.

Are there any risks to the **Integrity** of personal data? *Integrity is defined as unauthorised or accidental alteration of personal data.*

There are currently no known risks, but this will be updated once more information is received.

Are there any risks to the **Availability** of personal data? *Availability is defined as unauthorised or accidental loss of access to, or destruction of personal data.*

There are currently no known risks, but this will be updated once more information is received other than possible issues with business continuity if the internet was not available.

Are there any known or immediate technical / IT / Information Security / Cyber Security concerns?

There are currently no known risks at this time from IMS

Once the mitigations are implemented, how would you score any remaining risk in the following Risk Assessment? If you consider that there are no remaining risks give a value of 1 for both Likelihood and Severity.

Likelihood (please tick)			Severity (please tick)			=	4
1		Rare	1		Negligible		
2	x	Unlikely	2	x	Minor		
3		Possible	3		Moderate		
4		Likely	4		Major		
5		Almost certain	5		Catastrophic		
			x				

GP DPO Comments and Recommendations

This was created by the GP DPO team from information made available on the National systems from NHS digital. Please note this only covers practices using EMIS.

Date:	15/01/2021
IG Lead:	Rachel Adams ; Kent and Medway GP DPO

SIGN OFF

Practice SIRO:	Sarah Baker
Date & Signature:	<i>S.Baker</i> 26-10-21
Practice Caldicott Guardian:	Sarah Baker
Date & Signature:	<i>S.Baker</i> 26-10-21