



Data Protection Notice - Covid-19 Vaccination

The roll out of Covid -19 vaccinations to those in the custody of the Irish Prison Service (IPS) is being carried out as part of the National Public Health response to the pandemic. Covid-19 vaccinations are administered by the Irish Prison Service on behalf of the Health Service Executive (HSE).

The roll-out of vaccines by the Irish Prison Service is managed through the HSE Covid-19 Vaccine Information System. The Data Protection Notice and Data Protection Impact Assessment for the HSE system can be found at <https://www.hse.ie/eng/gdpr/data-protection-covid-19/data-protection-covid-19-vaccine-information-system.html>

Who is the Data Controller?

The data controller for the Covid-19 vaccination programme is the Health Service Executive (HSE). The Irish Prison Service is a Data Controller in its own right in respect of Prisoner Health information. Only information captured by Healthcare relating to the administration of the vaccine (Personal Data, Vaccinator/Healthcare Data, Vaccine Data) will be stored by IPS and integrated with the core HSE Vaccine Information System.

Purposes for Processing

Personal data, including the PPSN of individuals receiving Covid-19 vaccinations, is processed for the following reasons:

- 1) To monitor and record the receipt of vaccines by individuals to ensure the effective management of vaccinations, particularly in the context that an individual has received vaccine(s) to be fully effective
- 2) To assist in the management and recording of any adverse events with respect to vaccines or batches of vaccine.
- 3) To manage the recording of consent for vaccination
- 4) To support anonymised reporting and analytics on vaccine uptake.

The Department of Health has advised that the PPSN must be used for the purpose of interfacing with the HSE's Vaccine Information System.

Categories of Personal Data Processed

Based on the HSE's Covid-19 Vaccine Information System Data Protection Notice, the following categories of Personal data will be processed.

- Personal details about you, such as; date of birth, address, contact details,
- Healthcare details as well as your PPS Number (for identification purposes);
- Special categories of information including:
 - Ethnicity
 - Vaccination Status
 - *Prioritisation category*
 - *At-Risk category*
- Your consent to receive the vaccine will also be recorded.

Legal Basis for Processing

The lawful basis for processing under the GDPR in the context of this vaccine programme is the processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the controller;

For the HSE this official authority is vested through the Health Act 2004 (as amended).

The processing of the PPSN for this purpose is permitted under Section 262(4) of the Social Welfare Consolidation Act which allows for processing by Specified Bodies for the purposes of a “transaction” with a public body. The supply of a service is identified as a type of transaction under the legislation.

S.I. No. 698/2020 - Medicinal Products (Prescription and Control of Supply) (Amendment) (No. 7) Regulations 2020 addresses the specific provisions in respect of the supply and administration of Covid-19 vaccinations. Section 4 of these Regulations introduces a Section 10B into the Medicinal Products (Prescription and Control of Supply) Regulations 2003 (S.I. No. 540 of 2003) that specifically requires the recording of the PPSN in association with the details captured in relation to vaccine delivery.

For the Irish Prison Service, this authority is vested through Rule 99(5) of the Prison Rules 2007 (S.I. 252/2007).

Retention of Data

Information in respect of vaccinations will be retained by the HSE in line with the HSE’s data retention schedule. Information in respect of vaccine administration by the Irish Prison Service will be retained in line with the IPS data retention schedule for Healthcare data.

Your rights as a Data Subject

You have certain legal rights concerning your information and the manner in which we process it. These include:

- a right to get access to your personal information;
 - a right to request us to correct inaccurate information, or update incomplete information;
 - a right to request that we restrict the processing of your information in certain circumstances;
 - a right to request the deletion of personal information, excluding medical records;
 - a right to receive the personal information you provided to us in a portable format;
 - a right to object to us processing your personal information in certain circumstances; and
 - a right to lodge a complaint with the Data Protection Commission.
- You can access your health records by making a subject access request (SAR)

Contacting Data Protection Officers

The Data Protection Officer for the Irish Prison Service can be contacted at: ipsdpo@irishprisons.ie
IPS Data Protection Officer, Irish Prison Service Headquarters, Ballinalee Road, Longford N39 A308.

Full details of the contact points in the HSE for data protection requests can be found here: <https://www.hse.ie/eng/gdpr/data-requests/data-protection-officer-and-deputy-data-protection-officer-contact-details.html>

HSE Data Protection Officer, Room 102, Phoenix Hall, St Marys Campus, Dublin 20 D20 CK33.