

National Booking Service - Data Protection Impact Assessment

**REDACTED VERSION
(as at May 2021)**

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Purpose of this document

A Data Protection Impact Assessment (DPIA) is a useful tool to help NHS Digital demonstrate how we comply with data protection law.

DPIAs are also a legal requirement where the processing of personal data is “*likely to result in a high risk to the rights and freedoms of individuals*”. If you are unsure whether a DPIA is necessary, you should complete a DPIA screening questionnaire to assess whether the processing you are carrying out is regarded as high risk.

By completing a DPIA you can systematically analyse your processing to demonstrate how you will comply with data protection law and in doing so identify and minimise data protection risks.

This document should be read in conjunction with the DPIA Guidance and DPIA Screening Questionnaire

1. Consultation with Stakeholders

This data protection impact assessment for the National Booking Service has been developed with the following stakeholders:

User research

For the citizen facing elements of the National Booking Service, user research was undertaken from 30 September 2020 onwards through at least three rounds of consultation. Rapid iteration of the prototype to incorporate feedback and re-evaluate the product was expedited throughout this period. The user research group consisted of a cross section of the public including citizens representing Health and Social Care Workers, extremely vulnerable individuals and those aged over 80. (23 people in total, 10 women and 13 men). This was to ensure the purpose of the service was fully understood and helped to design the questions and screens for clarity and understanding.

For the staff facing elements of the National Booking Service, user research was undertaken between October and December with a single round of consultation. Again, rapid iteration of the prototype incorporated feedback and allowed re-evaluation of the product throughout this period. The user research group consisted of staff and colleagues who will manage the vaccination sites and the processes within, and included 5 Regional Managers, 5 Site Managers, 5 Arrivals Stewards and 5 Assessment Health Care Providers (20 people in total).

It should be noted that for both citizen and staff facing elements of the National Booking Service, this number and cross section was within the realms of limited time and resource. User research will be ongoing priority for the service prior to deployment and beyond.

Consultation

- GPs. The programme has engaged with members of the GP profession through a dedicated forum of representatives of the Joint GP IT Committee which represents the BMA and RCGP. These sessions have articulated the overarching goals of the service and highlighted the data flows occurring, including source of data and how patients will be communicated with. From a booking service point of view, this has not highlighted any data protection concerns.

- Internal stakeholders – this includes subject matter experts from clinical, security, legal, service management and information governance professions across NHS Digital.
- Government Digital Service (GDS) Peer Review – the service has completed a peer review against the GDS Service Standard.
- Various integration partners and suppliers, including suppliers of the National Immunisation Management Service (NIMS) as a critical component of the overall service.

Additionally, NHS England & Improvement, as commissioners of this service, have undertaken engagement with the following stakeholders as part of the development of the service:

- NHSx
- Government Digital Service (Gov.uk)
- Vaccinations Programme (NHS E)
- Clinical Advisory Group to the Vaccinations programme

2. Data Flow Diagram

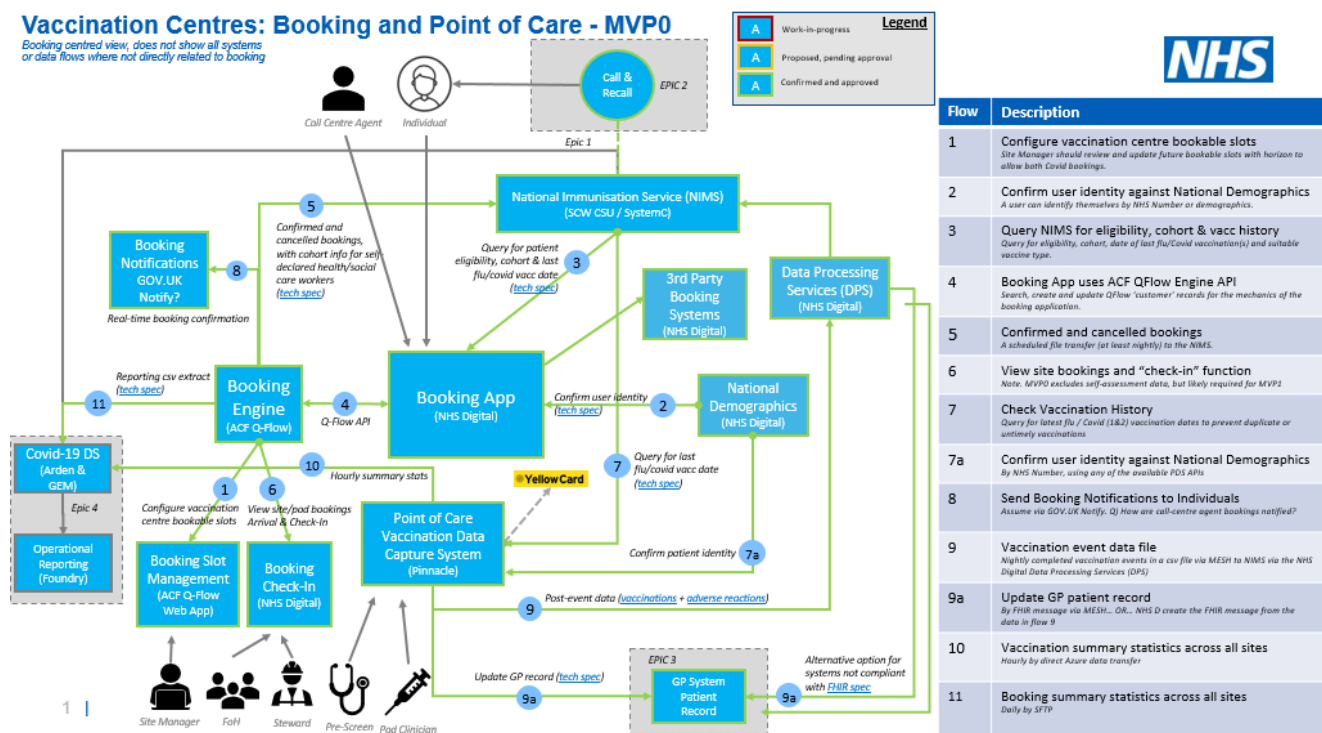


Diagram as of 27/05/2021

3. Purpose of the processing

NHS Digital has been commissioned by NHS E/I to build and host a national booking service on NHS.UK where members of the public will be able to book coronavirus vaccination appointments. This service will also be used by telephone contact centre agents booking on behalf of citizens.

Purpose of the National Booking Service

This service will enable citizens to:

- Book two coronavirus vaccination appointments at mass vaccination sites.
- Cancel and rebook their coronavirus vaccination appointments.
- Receive a booking confirmation by email or text message which they can take to the relevant vaccination site.

Citizens will provide or be matched to their NHS Number using a PDS look up according to existing business rules. The service will then use the NIMS system to ascertain whether a citizen is eligible at that time to book their coronavirus appointments and to check any existing vaccinations for both flu and coronavirus.

The data collected from a citizen who books through the National Booking Service will be used to complete the following:

- Create a 'customer' record in the National Booking Service allowing the citizen to book appointments and cancel/rebook appointments.
- Book coronavirus vaccination appointments.
- Contact the citizen by email and/or text to confirm their booking information.
- Enable the vaccination site to retrieve the booking information for the citizen so that they can be checked in and vaccinated.
- Enable anonymised reports to be produced on the take up of the service and the level of 'did not attend'.
- Update NIMS with the citizen's coronavirus vaccination appointment dates.

4. Description of the Processing

Nature and scope of the processing:

There is a landing page and service start page providing key information about COVID-19 vaccinations as well as an overview of the service which explains what information individuals will be asked to provide.

In line with the data flows in section 2, the citizen will provide their own patient identifiable data, entered to the booking service hosted on NHS.uk. This includes an option of:

- First Name, Surname, Date of Birth, Postcode, Gender or
- NHS Number and Date of Birth.

This allows the service to match the citizen to the correct NHS Number held on the Personal Demographics Service hosted by NHS Digital. If a citizen is matched to PDS, the

NBS will retrieve further details about them and store it within the booking service. This includes the following:

- NHS Number.
- First Name, Surname.
- Date of Birth.
- Postcode.

The service will also send queries to the National Immunisation Management Service (NIMS) that is hosted by System C and commissioned by NHS England. The query to NIMS will establish several specific data items for the specified user, by NHS Number, including:

- Flu vaccination status – whether a citizen has received a vaccination in the 2020/21 flu season and when this occurred. This data is stored in NIMS and derived from GP and pharmacy systems, among others.
- COVID-19 vaccinations status - whether a citizen has received a vaccination (including multiple doses) the type of vaccination and when this occurred – this is held in NIMS and derived from GP and pharmacy systems, among others.

Additionally, if certain information is not held on NIMS, we will ask the citizen to provide information about themselves to determine an appropriate appointment for the user, including:

- Recent or near future flu vaccination dates (if none found in NIMS), so that vaccine sequencing rules are applied to slot availability.
- Health and Care worker status, as this eligibility, (not available on NIMS), will be used to check employment status at the Vaccination Site Check-In.
- Pregnancy status, so that pregnant people are offered slots for Vaccination Appointments which are appropriate for them based on JCVI advice.

The name, Date of Birth and NHS Number is then submitted to a booking engine system, commissioned, and managed by NHS Digital, to create a customer record. The NHS Number and the Customer ID is then stored within the nhs.uk system for the identification of returning citizens for a specified duration (see section 11 for more information).

When a citizen begins the process of booking their appointment, they will be provided with details of the appointment and be asked to select or update a series of attributes relating to the appointment itself, these include:

- Accessibility needs e.g., wheelchair access.
- Contact email address and / or mobile telephone no. This will be used to send a booking confirmation to the citizen.
- Location postcode to search for nearest vaccination sites (i.e., if different from home postcode on PDS).
- Landline telephone number if the citizen does not have an email address or mobile telephone number, neither of which are mandatory.

Based upon the details provided by the citizen and the details from NIMS, a set of booking 'horizon' dates are calculated and passed to the booking engine and available dates are returned and offered to the citizen. This allows them to select an appointment. As such the appointment details are stored against the customer record, including:

- Booking reference.
- Appointment date, time, location.

The citizen is also sent confirmation of the booking via SMS and/or email that includes the above details and sent via GOV.uk Notify.

If a citizen needs to return to the service to check, cancel or re-book their appointment(s) they will be asked to provide the booking reference which is used by the service to query the booking engine and return the relevant details. If a user has lost their booking reference, they will be directed to the telephone contact centre where an agent will be able to retrieve their booking details without using the booking reference, subject to basic identity checks.

Citizen Pseudonymised Data

Export for booking data from the National Booking System (NBS) to the Palantir Foundry system for national reporting of COVID vaccination bookings.

Summarised, pseudonymised data is used to produce operational and strategic reporting.

The NBS booking engine implemented by ACF Technologies will create two daily CSV files: 1. Daily booking summary data - this sends Date, Time, ODS Code, Vaccine Type, Capacity

2. Daily booking detail data, where records are identified by NHS Number as follows

The data feeds travel via Arden & GEM where the data is cleansed, and the data then goes to Foundry for reporting purposes.

The detail file will include all bookings that have changed since the last data submission. A change would either be:

New confirmed booking

Cancelled booking.

Booking recorded as 'Did not attend'.

Booking marked as rejected when an individual attends their booking but is turned away before the start of the clinical screening process.

The Service also uses Qualtrics which is a User Research tool that supports the process for the completion of Online Surveys with citizens, this however only uses protected data.

Booking Centre Staff

Staff at the vaccination centres who need to use the booking system (e.g., for scheduling appointments or checking people in) will have the following information stored in their user accounts:

- First name, last name
- Email address

- Role indicator for role-based access control
- Site or sites they are working at
- Active or inactive account status indicator

This information is used to identify staff members within the system, helping to ensure that they have the access they need to do their jobs.

5. Describe the legal basis for the processing (collection, analysis, or disclosure) of personal data?

NHS Digital has been requested to establish the National Booking Service (NBS) by NHS England. The NBS is for COVID-19 vaccination bookings. A work-package document to confirm the commission and legal basis has been developed and agreed between NHS England and NHS Digital.

Direction: COVID-19 Public Health Directions 2020, 17th March 2020

Para 2.1.1 – establishing and operating information systems to collect and analyse data in connection with COVID-19; and

Para 2.1.2 – developing and operating information and communication systems to deliver services in connection with COVID-19.

Specifically:

Para 2.2.1 understanding COVID-19 and risks to public health, trends in COVID-19 and such risks, and controlling and preventing the spread of COVID-19 and such risks.

Para 2.2.2 - identifying and understanding information about patients or potential patients with or at risk of COVID-19 information about incidents of patient exposure to COVID-19 and the management of patients with or at risk of COVID-19 including: locating, contacting, screening, flagging and monitoring such patients and collecting information about and providing services in relation to testing, diagnosis, self-isolation, fitness to work, treatment, medical and social interventions and recovery from COVID-19;

Para 2.2.5 delivering services to patients, clinicians, the health services and adult social care services workforce and the public about and in connection with COVID-19, including the provision of information, fit notes and the provision of health care and adult social care services.

Compliance with Common Law Duty of Confidentiality by NHS Digital is provided by a Legal Obligation due to the above Direction under S254 of the Health and Social Care Act 2012 ("2012 Act"). GDPR Compliance is hence under Article 6(1)(c) – Legal Obligation – by virtue of Direction under S254 of 2012 Act and Article 9(2)(g) – substantial public interest, plus Part 2 Schedule 1 Data Protection Act 2018 para 6 – statutory and governmental purpose.

6. Demonstrate the fairness of the processing

Data collected through the National Booking Service is processed in line with the expectations of the individuals using the Service. It is a service with a specific purpose that individuals can choose to use to book their coronavirus vaccination appointments.

As described above the service integrates with other services to check or retrieve other data items. This includes:

- PDS – to verify the demographic details provided by the users to verify an NHS Number. This is important and reasonable and is required to mitigate any clinical or security risks associated with potential misidentification of the individual.
- NIMS – to verify the user's eligibility for a COVID-19 vaccination, check for any existing vaccination event history for both flu and COVID-19. Data is also sent to NIMS to record the vaccination appointment status. This is important and reasonable and required to ensure only those people who are eligible for the vaccine can book appointments. It also mitigates any clinical risks associated with a citizen mistakenly requesting more than one bout of vaccine.
- QFlow (booking engine) – to store the user's COVID-19 vaccination appointment details so that they can be verified and recorded at the point of vaccination. This is important and reasonable and required to ensure patients are given the correct information about their appointments and can be efficiently checked-in at the time of their appointment.
- Qualtrics - The Service also uses Qualtrics which is a User Research tool that supports the process for the completion of Online Surveys with citizens, this however only uses protected data.
- Other NHS Vaccination Booking Systems – The Service provides booking information to known 3rd Party Booking Systems who are already NHS Digital IG compliant.

There is no linkage or access to any other data. User testing has been undertaken to develop the Service using clear and plain language which users understand and with a design, flow and content approach which is in line with the other NHS.UK services and content aimed at members of the public.

NHS.UK has a clear cookie policy available in the footer of all pages and users are given choices of which cookies to accept or otherwise. Only essential cookies required for the service are exempt from preference selection.

7. What steps have you taken to ensure individuals are informed about the ways in which their personal data is being used?

A specific NHS Digital National Booking Service Privacy Notice has been produced and provides details regarding how, and why, NHS Digital will process and use personal data including information about the rights available to individuals to exercise.

The Privacy Notice is also specifically referred to in several key places in the customer journey: at the start, at the end and in the confirmation emails which are sent out after the appointments have been confirmed.

The National Booking Service provides clear information to explain the participant journey and the purpose of the service i.e., to book a coronavirus vaccination.

In general, the information is collected for the following purposes:

- To match a user to their NHS Number for use within the National Booking Service.
- To identify an individual as a health & social care worker if they are not flagged as such in NIMS.
- To ascertain the citizen's last flu vaccination date if this information has not been stored in NIMS.
- To ascertain whether a citizen is extremely clinically vulnerable to COVID-19.
- To confirm a citizen's appointment booking or appointment cancellation via text message and/or email.
- To enable the vaccination centre to retrieve a citizen's booking information so that they can be vaccinated.

8. Is it necessary to collect and process all data items?

Data Categories [Information relating to the individual's]	Yes	Justify [there must be justification for processing the data items. Consider which items you could remove, without compromising the purpose for processing]
Personal Data		
Name	X	This is so the citizen can be identified using the Personal Demographics Service (PDS).
Address	N/A	
Postcode	X	This is so the citizen can be identified using the Personal Demographics Service (PDS).
DOB	X	This is so the citizen can be identified using the Personal Demographics Service (PDS).
Age	N/A	
Sex	N/A	See note below re: Gender
Marital Status	N/A	

Data Categories <i>[Information relating to the individual's]</i>	Yes	Justify <i>[there must be justification for processing the data items. Consider which items you could remove, without compromising the purpose for processing]</i>
Gender	X	This is so the citizen can be identified using the Personal Demographics Service (PDS). Note: Though these data items are labelled as Gender on PDS, they are more closely aligned to Sex.
Living Habits	N/A	
Professional Training / Awards / Education	N/A	
Income / Financial / Tax situation / Financial affairs	N/A	
Email Address	X	Required for sending of confirmation of a vaccination appointment and to contact an individual should an appointment need to be cancelled by the vaccination site.
Physical Description	N/A	
General Identifier, e.g., NHS No	X	The NHS Number will be used if provided by the citizen, in conjunction with the DOB so that they can be identified on PDS; if the NHS Number is not provided, then the First name, Surname, DOB, Postcode will be used to match on PDS and obtain the NHS Number, The NHS Number is then used to identify vaccination suitability through the National Immunisation Service (NIMS) and identify appointments within the booking engine
Home Phone Number	X	This is only collected if the citizen does not provide another means of communication in a mobile number or an email address.
Online Identifier e.g., IP Address/Event Logs	N/A	
Website Cookies	X	Required for the operation of the application in line with the NHS.Uk Cookie policies.
Mobile Phone / Device No / IMEI No	N/A	
Location Data (Travel / GPS / GSM Data)	N/A	
Device MAC Address (Wireless Network Interface)	N/A	
Banking information e.g., account number, sort code, card information	N/A	
Criminal convictions / alleged offences / outcomes / proceedings / sentences	N/A	
<i>Mobile Phone Number</i>	X	Required for sending of confirmation and to contact an individual should an appointment need to be cancelled by the vaccination site.
<i>Occupation</i>	X	To manage a self-referral, the health care or social care worker status is asked for and stored in the booking engine. This is for checking at the site and based upon the cohorts of people eligible for the vaccine as determined by the JCVI.
Special Category Data		
Physical / Mental Health or Condition	X	A citizen's NHS Number constitutes Special Category Personal Data. There will, therefore, be instances where the citizen's

Data Categories [Information relating to the individual's]	Yes	Justify [there must be justification for processing the data items. Consider which items you could remove, without compromising the purpose for processing]
		<p>Special Category Personal Data are processed by the National Booking System. However, this is fully justified for the reasons set out above i.e., so the citizen can be identified using the Personal Demographics Service (PDS), be identify for vaccination suitability through the National Immunisation Service (NIMS) and so that appointments can be identified within the booking engine. (See Section 5 for details of GDPR legal basis and Article 9 exemption relied upon).</p> <p>We ask whether a citizen is pregnant so they can be offered slots for Vaccination Appointments which are appropriate for them based on JCVI advice.</p>
Sexual Life / Orientation	N/A	
Religion or Other Beliefs	N/A	
Trade Union membership	N/A	
Racial / Ethnic Origin	N/A	
Biometric Data (Fingerprints / Facial Recognition)	N/A	
Genetic Data	N/A	

9. Describe if personal datasets are to be matched, combined, or linked with other datasets? (internally or for external customers)

The NHS Number either derived or entered is matched against the Personal Demographic Service (PDS) and then used as a lookup against the National Immunisation Service (NIMS).

A customer record is created in the Booking Engine with NHS Number as the key. The information from NIMS including the flu vaccination data is not stored but used to determine a booking horizon. An appointment is then booked using this information.

There is no other matching, combining, or linking with other datasets.

10. Describe if the personal data is to be shared with other organisations and the arrangements you have in place.

When disclosing and sharing personal data with other organisations, NHS Digital complies with the GDPR and the DPA 2018 and additionally when sharing identifiable health data complies with the common law duty of confidentiality. All dissemination of data must also be permitted under NHS Digital's statutory powers.

Information regarding the booking of appointments to have a vaccination is shared with the National Immunisation Management Service (NIMS) so that the mechanism for invitations and reminders (call / Recall) can operate correctly.

Staff at the vaccination centres will be able to check that a visitor has an appointment by using citizen's booking reference number, name, mobile phone number or email address.

Staff at the vaccination centres will be able to view details of all appointments (past and future) at their centre. These details will include citizen's name, booking reference number, NHS number, appointment type (general/shielded), vaccine type and appointment time.

These employees' access to this data will be controlled through access to the Booking Engine.

Dissemination of data collected through the National Booking Service to NHSE. The purpose of the dissemination is for contact to be made with individuals whose Coronavirus vaccination appointment have been cancelled or other advice related to their appointments. NHSE have instructed SCW CSU (part of NHSE) as their processor who will provide an outbound call centre service to contact affected individuals with an appropriate explanation and advice on what to do next.

11. How long will the personal data be retained?

For Citizens:

To create vaccination appointments, we will need to create a customer record using information from the Personal Demographics Service (PDS) and information entered in the Service by the citizen.

We will also store appointment information in your customer record. Each booking will include the name of the vaccination centre, the date and time of your appointment.

We will retain the customer record and appointment information for as long as it is necessary to do so. We will review whether we need to retain the information every six months. The following factors will be considered when determining whether we need to retain data:

1. Whether the personal information is required to arrange COVID-19 vaccinations appointments
2. Whether it is necessary to retain the information for the purposes of future coronavirus vaccinations and/or booster vaccinations
3. Whether it is necessary to retain the information for clinical safety purposes

We will only retain personal data for as long as the law allows. Once your customer record is no longer required by the Service, it will be permanently deleted.

For Staff:

We will retain staff data for as long as the Book a Coronavirus Vaccination Service exists. It will then be permanently deleted.

12. Where you are collecting personal data from the individual, describe how you will ensure it is accurate and if necessary, kept up to date

The following citizen information is stored within the Booking engine:

- NHS Number.
- Customer Id.
- First Name, Surname.
- Date of Birth.
- Health & Social Care Indicator, if self-referred
- Booking References, one for each dose.
- Appointment details, one for each dose.

It is expected that summarised, pseudonymised data will be used to produce operational and strategic reporting. This may be included in future versions of the NBS and these must be included within a future version of the DPIA.

Staff at the vaccination centres with user accounts will have the following information stored in the Booking engine:

- First name
- Last name
- Email address.

They will be able to update these details themselves, Managers will be encouraged to review lists of staff periodically.

The accuracy of data has been assured by:

- Using a PDS trace to confirm personal details.
- Using the National Immunisation Service (NIMS) to confirm vaccine eligibility. (NIMS will be covered under a separate DPIA).
- Utilising User Testing to ensure any questions relating to previous vaccinations, shielding and eligibility through role (Health and Social Care Workers) are appropriate and can be easily understood.
- Using field validation to ensure email addresses and contact numbers are formatted to a standard.

It has been noted that abilities to change details by the citizen has been identified and will be considered in future releases of the NBS.

13. How are individuals made aware of their rights and what processes do you have in place to manage such requests?

The list below identified each of the rights an individual has under GDPR, and how and what processes will be put in place to manage requests:

- The right to be informed. A privacy statement will be made accessible on every page of applications being used by citizens and staff. Reference to the policy statement will also be made on any correspondence between the citizen and the National Booking Service such as confirmation emails.
- The right of Access. Subject Access Requests (SARs) will in the first instance be managed by the NHS Digital Help Line call centre, who in turn will pass to the Vaccinations Programme. The request will be analysed by the Vaccinations Programme and responded to as required by law.
- The right to rectification. Corrections to data would in the first instance be managed by the NHS Digital National Help Line who would contact the BAU vaccinations programme to identify the differences and corrected, as necessary.
- The right to erasure ("right to be forgotten"). Information regarding the citizen record and booking details will be deleted See section 11. Information regarding the staff record will be deleted, See section 11.
- The right to restriction of processing. Requests to restrict processing by citizens will in the first instance be managed by NHS Digital National Help Line who would contact the Vaccinations Programme to identify data being processed and stop. Typically, any appointments for the citizen would be deleted. Any right to restrict requests for NIMS or PDS would be passed on to the relevant teams. For staff maintaining the booking engine, appointments, and operational procedures such as checking in citizens appointments, it is a requirement of the staff roles to allow processing of their captured data. It ensures access to the systems is secure and ensures there is appropriate audits in place to help assure procedures are adhered to.
- The right to data portability. This does not apply to the processing of data within the NBS.
- The right to object. In the first instance requests of this nature will be managed by the NHS Digital Help Line call centre, who in turn will pass to the Vaccinations Programme. Any right to object requests for NIMS or PDS would be passed on to the relevant teams. The request will be analysed by the Vaccinations Programme and responded to as required by law.
- The right not to be subject to automated decision making. Throughout the citizen journey of booking an appointment, there is opportunity to connect with the NHS Digital Help Line, such that complex circumstances can be managed by humans and are not necessarily automated.
- The right to withdraw consent. Changes to consent would in the first instance be managed by the NHS Digital National Help Line who would contact the BAU vaccinations programme to identify the differences and corrected, as necessary.
- The right to complain. In the first instance requests of this nature will be managed by the NHS Digital Help Line call centre, who in turn will pass to the Vaccinations Programme. Any complaints for NIMS or PDS would be passed on to the relevant

teams. The request will be analysed by the Vaccinations Programme and responded to as required by law. Citizens have the right to complain to NHS Digital and to the Information Commissioners Office (ICO). Information on this procedure will be contained in the NBS privacy policy.

Individuals are made aware of these rights by a privacy statement that will be accessible on every page of citizen and staff facing applications. Reference to this will also be included in any correspondence with the citizen including booking confirmation emails.

14. What technical and organisational controls for “information security” have been put in place?

The solution follows existing best practice employed by NHS Digital and makes use of Role Based Access Control (RBAC).

NCSC guidance is followed by adhering 14 security principles:

- Protection of data in transit and at rest (encryption). User data transiting networks is adequately protected against tampering and eavesdropping.
- Asset protection and resilience. User data, and the assets storing or processing it, is protected against physical tampering, loss, damage, or seizure.
- Separation between users. A malicious or compromised user of the service should not be able to affect the service or data of another.
- Governance framework. The service provider has a security governance framework which coordinates and directs its management of the service and information within it.
- Operational security. The service will be operated and managed securely to impede, detect, or prevent attacks. Good operational security should not require complex, bureaucratic, time consuming or expensive processes.
- Personnel security. Thorough screening supported by adequate training is in place.
- Secure development. Services are designed and developed to identify and mitigate threats to their security.
- Supply chain security. Supply chain is satisfactorily supporting all the security principles which the service claims to implement.
- Secure user management. The relevant tools in place and available to securely manage the service, management interfaces. Procedures are in place, preventing unauthorised access and alteration of resources, applications, and data.
- Identity and authentication. All access to service interfaces is constrained to authenticated and authorised individuals.
- External interface protection. All external or less trusted interfaces of the service are identified and appropriately defended.
- Secure service administration. Systems used for administration of the service will have highly privileged access to that service, therefore strong authentication is in place for such accounts.

- Audit information for users. Logging and audit records are configured to monitor access/use of the service and the data held within it to be able to identify who access what, why and when.
- Secure use of the service. The security of the services and the data held within them will be adequately protected. e.g., Installing a modern operating system, configuring that operating system securely, securely deploying any applications and maintaining that instance through applying patches or performing maintenance required.

15. In which country/territory will personal data be stored or processed?

The data will be processed and stored in the United Kingdom by NHS Digital and ACF Technologies UK Ltd who supply the booking engine. All NHS Digital data held within NBS is within the UK jurisdiction as it is hosted in the Microsoft Azure cloud within the UK.

16. Does the National Data Opt Out apply to the processing?

No. The National Data Opt Out does not apply to personal data and confidential patient information that is processed for COVID-19 purposes under the COVID-19 COPI Notice.