

Digital Health & Care
30 June 2021

Cabinet Secretary for Health and Social Care
UPDATE ON COVID STATUS CERTIFICATION – INTERNATIONAL TRAVEL

Purpose

1. To seek your agreement on:
 - the SG Covid Status Certification Delivery Board's recommended identity verification solution for the NHS Scotland Covid Status app (the App);
 - keeping the current interim paper-based solution for vaccination status in place until early Autumn when the app will be launched with the identity verification solution;

[REDACTED]

Priority

2. Routine

Background

3. The interim solution for Vaccination Status has generated 122,000 letters to date and is being received within 14 days of being requested.
4. The Four Nations vaccination status letters is still being developed and we are waiting for artwork from NHSx in order to proceed. This means the introduction of the Four Nations letter is now likely to be mid-July.
5. **[REDACTED]**
6. **[REDACTED]**
7. WHO has revised its focus away from storing the digital public keys of members states, to facilitate the validation and verification of digitally signed COVID-19 certificates. Instead focusing only advising Member States on how to digitally document COVID-19 vaccination status, test status

and recovery status. This means that Scotland now needs to find an alternative solution to validating and verifying digitally signed certificates.

Identity Verification

[REDACTED].

8. [REDACTED].

9. A Short Life Working Group met over three days to develop a rapid assessment to aid the Covid Status Certification Delivery Board with their decision on the type of identity verification solution to be procured. Input was gathered from across our organisations including technical, user testing, programme, IG and security, and procurement.

10. There is a need to ensure that a robust method of identify and verification is built into the Covid Certification app. [REDACTED] and the inability for person to travel internationally or use their Covid status.

11. [REDACTED]

12. The full range of options considered by the Covid Status Certification Delivery Board are set out in Annex A.

[REDACTED].

Recommended Approach: Biometric Identification Check

[REDACTED]

User research conducted around identity verification options concluded that:

- [REDACTED]
- [REDACTED]
- The non-digital route is needed to support people who cannot, or choose not to, use the digital options.

[REDACTED]

Digitally Signing Covid Status Certificates

13. [REDACTED]

14. NHS Scotland has developed the technical capabilities to participate in the proposed WHO scheme, including a Public Key Infrastructure (PKI), the ability to generate QR codes, and a way to connect to both vaccination and test data stores to retrieve required data.

15. [REDACTED].

16. [REDACTED]

17. We have provided NHSx with a preferred option for working together and the details are set out below. Details on the range of options we have put forward are included in Annex B.

Recommended Approach: NHSx acts as a broker for DA's and Crown Dependencies

18. [REDACTED]

19. [REDACTED]

20. [REDACTED]

21. [REDACTED]

Recommendation

22. [REDACTED]

- [REDACTED]
- [REDACTED]

[REDACTED]

Covid Ready Society/Digital Health & Care
21 May 2021

Cabinet Secretary for Health and Social Care

FOUR NATIONS BRANDING OF COVID STATUS CERTIFICATES

Purpose

[REDACTED]

Priority

23. Routine

Background

24. We continue to discourage people from travelling abroad and to only apply for a record of vaccination status if travelling within the next 21 days.

25. An interim record of vaccination status was made available on 19 May allowing people to download or request a letter showing their vaccination status. This interim record is not a vaccination certificate. It has been carefully designed to have a similar appearance to the UKG's interim solution and that of the other DAs and Crown Dependencies.

26. [REDACTED]

27. There has been significant demand already, with 25,000 downloads since launch and 4,000 calls to the helpline. We will continue to monitor pressure on the helpline and direct people to the digital first route via NHS Inform.

28. [REDACTED]

29. [REDACTED]

30. [REDACTED]

31. UKG are keen to implement this as soon as possible to ensure alignment in interim solutions across the UK. [REDACTED].

Rationale for Adopting Fully Four Nations Alignment at End of June

32. We have made it clear to the Four Nations and Common Travel Area that working towards a common standard and alignment with international travel standards should be the priority. [REDACTED].

33. Our concerns about making changes to an interim solution before end of June are as follows:

- [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Recommendation

[REDACTED]

[REDACTED]

Digital Health & Care
5 May 2021

First Minister

COVID STATUS CERTIFICATION FOR INTERNATIONAL TRAVEL: INTERIM AND LONG TERM SOLUTION

Purpose

34. The purpose of this submission is to seek your agreement:

- [REDACTED]
- [REDACTED]

and to inform you:

- [REDACTED]
- [REDACTED]

Priority

[REDACTED]

35. [REDACTED]

Background

36. A number of countries have indicated that when the UK opens its international borders, potentially on 17 May, that they will welcome visitors from the UK who can provide evidence they have been vaccinated for Covid 19 without the need to self-isolate on arrival. [REDACTED].

37. [REDACTED]

38. We are still unclear as to how many countries will require proof of vaccination alone in order to be exempt from quarantine. It is also unclear as to whether some countries may allow those with one vaccination to travel [REDACTED]

39. [REDACTED] [REDACTED].

UKG Paper Based Interim Approach

40. UKG has confirmed that as well as providing Covid Status Certificates via an app, everyone in England will receive a paper copy of certificate statement of vaccination in the post, seven days after their 2nd dose. This process is expected to start from the 17th May with 2.5m paper certificates issued per day.

41. FCDO have also suggested that proof of vaccination will also be made available on request although [REDACTED].

42. [REDACTED].

43. [REDACTED]

44. [REDACTED]

Scotland's Interim Digital Approach

45. [REDACTED].

46. [REDACTED]

47. [REDACTED].

48. [REDACTED].

49. [REDACTED].

50. [REDACTED].

51. [REDACTED].

52. [REDACTED].

53. [REDACTED]..

54. Further details on the considerations given to [REDACTED]. approaches are set out in Annex A.

Assurance and Equality Considerations

[REDACTED]

55. .

[REDACTED]

[REDACTED]

Policy Considerations for Inbound Travel

56. From 17 May anyone entering the UK will have to meet the entry requirements under the traffic light system regardless of whether they have been vaccinated against Covid. There is potential for the 4 Nations to allow people who can demonstrate they have been fully vaccinated (two doses) with an approved EMA/WHO Covid vaccine be subject to less restrictions on entry to the UK. [REDACTED].

57. Chinese and Russian vaccines are not currently approved by WHO or EMA [REDACTED].

Update on Full Digital Solution

58. With regards to the Scottish Covid Status Certificates, [REDACTED].

59. We continue to engage across Four Nations [REDACTED].

60. [REDACTED].

61. We will provide detailed delivery timescales once [REDACTED].

62. [REDACTED].

63. [REDACTED].

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Use of [REDACTED]

64. On 27 April UKG set out the clear intention to allow 4 Nations to use the NHS app as a common interface for the fully digital solution. [REDACTED]

65. The NHS App uses the NHS login to authenticate. This login has three levels of authentication:

- Low - email and password – this allows a user to do simple things like book a test.
- Medium – details are checked against the Personal Demographics Service (PDS) – this level of authentication will allow patient to contact their GP and receive notification, but not health information or personal data.
- High – patient must submit photo ID and have a face scan, or photo ID and a video, or use registration details from online GP Services (this uses ODS – Organisational Data Service) – Only with High level authentication can patients request access to health information or personal data.

66. Scotland and NHSX have had technical discussions about the NHS App [REDACTED].

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Recommendation

[REDACTED]

[REDACTED]

Digital Health & Care
27 April 2021

Cabinet Secretary for Health and Sport

AN UPDATE ON PROGRESS OF THE INTERIM SOLUTION TO COVID STATUS CERTIFICATION

Purpose

67. The purpose of this submission is to:

- set out the considerations behind our work to deliver vaccination certificates as the interim solution to Covid Status Certificates.
- inform you that we are proceeding with option one in order to meet the requirements for international travel by 17 May.

Priority

68. Urgent – [REDACTED]

Background

69. In the submission dated 12 April [REDACTED].

The interim solution will only provide [REDACTED]. They do not impact inbound travel and the quarantine requirements in place in Scotland. [REDACTED]

70.

71. The solution is [REDACTED]

72. It has been confirmed that UKG will have Covid Status Certificates (vaccination and test data but excluding private PCR tests) available on 17 May. [REDACTED]

Update on Full Digital Solution

73. With regards to the Scottish Covid Status Certificates, [REDACTED]

74. We will provide delivery timescales once the [REDACTED].

Option One – [REDACTED]

75. [REDACTED]

76. [REDACTED]

Advantages

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Disadvantages

- [REDACTED]
- [REDACTED]

Option Two – [REDACTED]

77. [REDACTED]

78. [REDACTED]

Advantages

- [REDACTED]
- [REDACTED]

Disadvantages

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Outstanding Policy Decisions

Timescales (tentative)

- [REDACTED]
- [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Recommendation

79. [REDACTED]

[REDACTED]

Covid Ready Society/Digital Health & Care
12 May 2021

Cabinet Secretary for Health and Sport

UPDATE ON RECORD OF VACCINATION STATUS TO FACILITATE OUTBOUND INTERNATIONAL TRAVEL

Purpose

1. The purpose of this submission is to:
 - update you on the plans to make an interim record of Covid vaccination status available;
 - seek your agreement to the interim arrangements for evidencing vaccination status that come into effect on 17 May when international travel restrictions are lifted; and
 - to provide an update on the proposed public messaging.

Priority

2. Routine – however early confirmation would allow public messaging to be put into place timeously.

Background

3. An individual's vaccination record forms part of their medical record which people are entitled to see.
4. A number of countries have indicated that people who provide evidence they have been vaccinated against Covid 19 will be able to enter that country either without the need for recent negative PCR test or to not be required to self-isolate/quarantine on arrival. There are currently no plans to require evidence of vaccination to be a condition of entry to the UK.
5. International travel restrictions, for non-essential travel, are due to end on 17 May when Scotland moves to level 2 in the route map. [REDACTED] [REDACTED].

[REDACTED]

6. [REDACTED].

Position in Scotland

Interim Solution

7. An interim record of Covid vaccination status is being established for the 17 May ready for international travel to reopen. [REDACTED].
8. From 19 May users will be able to [REDACTED].
9. [REDACTED]. [REDACTED]
10. The interim solution is a [REDACTED].

Long Term Solution

11. [REDACTED].
12. [REDACTED].
13. [REDACTED].

Section 93 Order

14. The Scotland Act 1998, s93(1), provides that:

“A Minister of the Crown may make arrangements for any of his specified functions to be exercised on his behalf by the Scottish Ministers; and the Scottish Ministers may make arrangements for any of their specified functions to be exercised on their behalf by a Minister of the Crown.”

15. [REDACTED].
16. Yellow fever certificates are issued under the 2005 Regulations and are branded jointly by the UK Department of Health, the NI Department of Health, the Scottish Government, and the Welsh Government. [REDACTED].
17. [REDACTED].
18. Discussions on the need for s93 for [REDACTED].

Equalities Issues

19. The policy intention is to provide people who have been vaccinated in Scotland with information about their Covid vaccination to enable them to travel to countries that require evidence of vaccination either (a) as a condition of entry instead of a negative Covid test or (b) as a way of having fewer restrictions on arrival (eg not having to self-isolate).
20. [REDACTED]
21. We have been mindful in developing a record of vaccination that both an electronic and paper version is provided to ensure those who do not have access to smartphone technology are able to travel. We have set up both a website and a helpline for [REDACTED] which will enable people to access paper copies. Measures have been taken to ensure these cannot be copied.
22. [REDACTED]
23. [REDACTED] [REDACTED]

Unintended Use of Vaccination Status

24. It is possible that once a record of vaccination status is available to support international travel other people will ask for it as evidence of vaccination status for other purposes. [REDACTED]. The letter also clear states that it confirmation of vaccination status cannot be used as a form of identification and that it must be used in conjunction with photo ID.

Communications

[REDACTED]

25. [REDACTED].

26. We continue to be highly cautious on international travel, given the risk of new variants. The four UK Chief Medical Officers have said that green-list status should be the exception, rather than the rule, with countries added to the list only where there are very good reasons for doing so.

27. In providing people with a record of their vaccination status [REDACTED] and facilitate international travel if vaccination status is required by the destination. Not many countries require a record of COVID-19 vaccination status at present and messaging will advise people to follow strict protocols set out to minimise transmission and check the entry requirements for their destination country on UK Government's foreign travel advice page. We will also make clear the requirements that people will have to follow on return to Scotland.

- [REDACTED] [REDACTED]
- Advice from clinicians is to continue to use PCR testing for in bound international travel, which is more accurate and allows us to test for variants of concern. [REDACTED].
- We are also working to provide people with a record of their vaccination status if they need this for outbound international travel.
- Not many countries currently require a record of Covid vaccination status. So for the time being most people will still need to follow other rules when travelling abroad – like getting a negative pre-departure test.

If you are intending to travel abroad you should:

- check the entry requirements for your destination country on the GOV.UK foreign travel advice pages;
- get up-to-date information from the website of your destination country.
- check the re-entry requirements for your return to Scotland;
- only request record of vaccination status if it is absolutely required and if you are due to travel in the next 21 days;

- To request confirmation of your vaccination status visit NHS Inform or call [0800 number to be confirmed].
- We are working on a fully digital solution (with paper based alternative) for the Covid Status Certification (vaccination and testing data) but this will take a number of weeks to implement. We are in discussions with the Common Travel Area on how to align digital solutions and meet international standards for this long term solution.
- More detail about how to request your vaccination status will be released later this week.

Recommendation

28. We seek your agreement to:

- [REDACTED]
- [REDACTED]

ANNEX A

Draft wording for NHS Inform

[REDACTED]

ANNEX B

Draft Record of Vaccination Status – Interim Solution/Paper Based Solution

[REDACTED]

[REDACTED]

Digital Health & Care
3 May 2021

Cabinet Secretary for Health and Sport

COVID STATUS CERTIFICATION FOR INTERNATIONAL TRAVEL: INTERIM AND LONG TERM SOLUTION

Purpose

29. The purpose of this submission is to seek your approval for pursuing a Scottish interim digital approach that responds to demand and aligns with international standards. [REDACTED]

Priority

30. [REDACTED]. [REDACTED]

Background

31. A number of countries have indicated that when the UK opens its international borders, potentially on 17 May, that they will welcome visitors from the UK who can provide evidence they have been vaccinated for Covid 19 without the need to self-isolate on arrival. [REDACTED]

32. [REDACTED]

33. Following my submission dated 12 April, [REDACTED]

[REDACTED]

34. EU Health Network has released standards for use of Covid Status Certification and the guidelines for its own Digital Green Pass. We are linked in with World Health Organisation's Smart Vaccination programme which is also developing its guidance but currently only covers vaccinations and is not yet in a position where it is advocating the use of vaccination certificates. [REDACTED]

35. Cabinet Secretary for Health and Sport has been consulted [REDACTED]

UKG Paper Based Interim Approach

[REDACTED]

36. FCDO have also [REDACTED]

37. [REDACTED]

38. [REDACTED]

39. [REDACTED]

Scotland's Interim Digital Approach

40. [REDACTED]

41. [REDACTED]

42. [REDACTED]

43. [REDACTED]

44. [REDACTED]

45. [REDACTED]

46. [REDACTED]

47. [REDACTED]

48. Further details on the considerations [REDACTED]

Assurance and Equality Considerations

49. We are conducting a rapid assessment for data protection considerations. This is to ensure we meet the swift timescales.

50. A privacy notice will need to be published [REDACTED] for public awareness.

[REDACTED]

Policy Considerations for Inbound Travel

51. [REDACTED]

52. From 17 May anyone entering the UK will have to meet the entry requirements under the traffic light system regardless of whether they have been vaccinated against Covid. [REDACTED]

53. Chinese and Russian vaccines are not currently approved by WHO so it is unlikely reciprocal arrangements will be agreed with countries issuing those vaccines. [REDACTED]

Update on Full Digital Solution

54. [REDACTED]

55. [REDACTED]

56. We will provide detailed delivery timescales [REDACTED]

57. [REDACTED]

58. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

59. [REDACTED]

60. The NHS App uses the NHS login to authenticate. This login has three levels of authentication:

- Low - email and password – this allows a user to do simple things like book a test.
- Medium – details are checked against the Personal Demographics Service (PDS) – this level of authentication will allow patient to contact their GP and receive notification, but not health information or personal data.

- High – patient must submit photo ID and have a face scan, or photo ID and a video, or use registration details from online GP Services (this uses ODS – Organisational Data Service) – Only with High level authentication can patients request access to health information or personal data.

61. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Recommendation

Your approval is sought on Scotland's [REDACTED]

ANNEX A

[REDACTED]

62. [REDACTED]

63. [REDACTED]

Advantages

- [REDACTED]
- [REDACTED]
- [REDACTED]

Disadvantages

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Interim Option B – [REDACTED]

64. [REDACTED]

65. [REDACTED] UKG have confirmed that all people who have had their 2nd dose will receive a paper copy of their record of vaccination in the post. [REDACTED]

Advantages

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Disadvantages

- [REDACTED]
- [REDACTED]
- [REDACTED]

ANNEX B

Scottish Interim Digital Process

Step by step run through of accessing portal

[REDACTED]

Covid Ready Society/Digital Health & Care
13 May 2021

First Minister
Cabinet Secretary for Health

COMMUNICATIONS PLAN FOR RECORD OF VACCINATION STATUS TO FACILITATE OUTBOUND INTERNATIONAL TRAVEL

Purpose

66. The purpose of this submission is seek your agreement [REDACTED]

Priority

67. Routine – [REDACTED]

Background

68. Following your approval of the recommendations from our submission dated 12 May this submission outlines the communications plan for the [REDACTED]

69. [REDACTED]

70. [REDACTED]

[REDACTED]

71. [REDACTED]

72. [REDACTED]

[REDACTED]

73. Current international travel requirements rely on PCR testing rather than vaccination status and there are no countries currently requiring vaccination status to travel. [REDACTED]

74. [REDACTED]

Communications Plan for [REDACTED]

75. [REDACTED]

76. Vaccination status is a statement of fact so we are not calling it a 'certificate' or 'proof'.

77. [REDACTED]

78. Planned activity:

International Travel Re-opens - 17 May

We are expecting [REDACTED]

A SG spokesperson said:

"Not many countries currently require a record of Covid vaccination status. So for the time being most people will still need to follow other rules when travelling abroad – like getting a negative pre-departure test.

"We are working to provide people with a record of their vaccination status if they need this for outbound international travel and will provide an update shortly."

Background

If you are intending to travel abroad you should:

- *check the entry requirements for your destination country on the GOV.UK foreign travel advice pages;*
- *get up-to-date information from the website of your destination country.*
- *check the re-entry requirements for your return to Scotland.*

Launch of [REDACTED] – 19 May

- NHS Inform content goes live
- Gov.scot will direct people to NHS Inform for more information
- Helpdesk available for requesting vaccination status by post
- Social media content issued
- Press release issued

Final Design of Record of Vaccination Status

79. [REDACTED]

80. [REDACTED]

81. [REDACTED]

Recommendation

82. [REDACTED]

ANNEX A

Approved Public Messaging

- [REDACTED]
- [REDACTED]
- [REDACTED]

- [REDACTED]

If you are intending to travel abroad you should:

- check the entry requirements for your destination country on the GOV.UK foreign travel advice pages;
- get up-to-date information from the website of your destination country.
- check the re-entry requirements for your return to Scotland;
- only request record of vaccination status if it is absolutely required and if you are due to travel in the next 21 days;

- [REDACTED]

ANNEX B

PDF Attachment: [REDACTED]

ANNEX C

PDF Attachment: [REDACTED]

ANNEX D

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

Digital Health & Care
29 June 2021

Cabinet Secretary for Health and Social Care

UPDATE ON COVID STATUS CERTIFICATION

Purpose

83. To provide you with a summary of the current position and seek your agreement on the next steps.

Priority

84.

QR Codes and PKI

85. [REDACTED]

86. [REDACTED]

87. [REDACTED]

88. [REDACTED]

[REDACTED]

89. This approach would follow the same draft specifications set out by WHO and the full specification of the EU.

90. [REDACTED]

91. [REDACTED]

92. [REDACTED]

93. The advantages and disadvantages of this approach are set out in detail in Annex A.

Advantages

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Disadvantages

- [REDACTED]

Identity Verification

94. Scotland does not have an existing NHS app like England and Wales that can be used to include Covid status. [REDACTED]

95. [REDACTED]

96. [REDACTED]

97. [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

98. The advantages and disadvantages of this approach are set out in detail in Annex A.

User research conducted around identify verification options concluded that:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Recommendation

X A: QR Codes and PKI

Option 1 – [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Advantages

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Disadvantages

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Option 2 – [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Advantages

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Disadvantages

[REDACTED]

[REDACTED]

[REDACTED]

Option 3 – [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Advantages

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Disadvantages

[REDACTED]

ANNEX B – [REDACTED]

[REDACTED]

[REDACTED]

Pros

- [REDACTED]

- [REDACTED]

Cons

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

General Risks

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

User Research

Survey Approach

Feedback from [REDACTED] who carried out the research

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

1. [REDACTED]

2. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On the whole they said that this felt:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

and/or

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

COVID VACCINE CERTIFICATION 9 SEPTEMBER: TOP ISSUES

(this section – issues and top lines – background provided in the following section)

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- ISSUE 2: PEOPLE VACCINATED OUTSIDE SCOTLAND
- ISSUE 3: EXEMPTIONS ON MEDICAL GROUNDS
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- ISSUE 6: ADDITIONAL BURDEN AND COSTS FOR BUSINESS
- ISSUE 7: CIVIL LIBERTIES / THIS IS OPEN ENDED - WHEN WILL CERTIFICATION END
- ISSUE 8: DATA SECURITY
- ISSUE 9: NIGHTCLUBS
- ISSUE 10: INTEROPERABILITY ACROSS RUK
- ISSUE 11: PEOPLE WHO HAVE BOUGHT SEASON TICKETS ALREADY
- ISSUE 12: INCREASING VACCINATION UPTAKE IN YOUNGER PEOPLE
- ISSUE 13: HOW WILL THE SCHEME BE ENFORCED
- ISSUE 14: ADDRESSING EQUALITY ISSUES

ISSUE 1: [REDACTED]

- [REDACTED]
- [REDACTED]

ISSUE 2: PEOPLE VACCINATED OUTSIDE SCOTLAND

[REDACTED] top lines

1. people vaccinated with MHRA approved vaccinations

- The scheme will recognise people who were vaccinated in other countries (including RUK and Common Travel Area) with an MHRA approved vaccine
 - [REDACTED]
 - [REDACTED]
- 2. [REDACTED]

ISSUE 3: EXEMPTIONS ON MEDICAL GROUNDS

[REDACTED] top lines

- [REDACTED]
- It is estimated that fewer than 1 in 1,000 people (0.1%) of the population cannot be vaccinated for medical reason (distinct from those exempt due to age or participation in a clinical trial).
- Reasons may include those with medical contraindications including severe allergic reaction to vaccine and those receiving end of life care.
- [REDACTED]

ISSUE 4: CLINICAL TRIALS EXEMPTIONS

[REDACTED] top lines

- **[REDACTED]**
 - All Clinical Trial Participants have already received a letter from their Principal Investigator which can be used for proof of their trial status.
[REDACTED]
 - Recently, we have also issued participants with a record of vaccination which contains a 1-D barcode and security features consistent with all Records of Vaccination.

ISSUE 5: WHY NOT ALLOW NEGATIVE TEST AS ALTERNATIVE TO VACCINATION?

[REDACTED] top lines

- We have carefully considered whether certification should include vaccination, testing - or both - and have concluded that vaccination is the best way to ensure people are protected and reduce the risk of severe illness and death.

[REDACTED]

- Ensuring only those who are double vaccinated attend certain higher risk venues and events therefore directly reduces the risk of transmission in these settings.
- It does not eliminate the risk but it does reduce the risk.
- Where someone does catch the virus, being vaccinated significantly reduces the likelihood of serious harm or death and in doing so alleviate pressure on the healthcare system.
- We know that there are limitations on testing, no tests are 100% accurate and we know that testing at home can't be verified for certification purposes.

- Vaccine certification provides the best way to reduce the risk however we still encourage people to continue to test twice a week at home. If people follow these guidelines and isolate if they get a positive result we will drive down the case rates.
- In addition, the need to be vaccinated is expected to encourage the remaining sections of the eligible population yet to be vaccinated to take up the offer of the vaccine.

ISSUE 6: ADDITIONAL BURDEN AND COSTS FOR BUSINESS

[REDACTED] top lines

costs

- While we do not underestimate challenges for businesses, it is important to recognise that vaccine certification is intended to be a proportionate alternative to the risk of further periods of closure for higher risk venues.
- All software, apps and paper copies of certificates will be free to use.
- There will be costs - Businesses will require a hardware mechanism (such as mobile phones) to verify the certificates. Any additional staffing or infrastructure costs will be met by businesses.

designing a proportionate, effective and robust scheme

- **[REDACTED]**
- **[REDACTED]**
- **[REDACTED]**
- The detail of the scheme will continue to develop in a way that takes account of the view of businesses in relevant sectors.

ISSUE 7: CIVIL LIBERTIES / THIS IS OPEN ENDED - WHEN WILL CERTIFICATION END

[REDACTED] top lines

- [REDACTED]
- [REDACTED]

ISSUE 8: DATA SECURITY

[REDACTED] top lines

- Security of the Covid certificates generated is critical. [REDACTED]. The certificates generated digitally on the App cannot be altered or changed.
- The security of all Covid certificates is aligned to the same standards used across the other 4 Nations for the generation of Covid Certificates.
- As part of the security of all certificates, the 2D barcodes (known as QR codes) have an expiry date and these dates are clearly displayed on the PDF downloads and paper copies. Once expired, users will have to request a further update to the certificate, either via the app or paper-based process. Expiry dates are used as part of the overall security of the system, and to help ensure that information is up to date.
- The scheme and legislation will comply with the GDPR and Data Protection Act legislation.
- [REDACTED]
- A privacy notice which explains what data is collated, why and how it will be stored and destroyed will be published.
- The app doesn't use address data at all. Paper Covid Status letters are sent to address that is linked to CHI number. Those wanting to change address need to do that at their GP.

ISSUE 9: NIGHTCLUBS

[REDACTED] top lines

- Nightclubs were not previously defined in the Covid regulations, so the dictionary definition applied.
- However, there is now a need to define nightclubs and other analogous venues, as behaviours that were previously prohibited are now allowed in wider parts of hospitality (for example, after midnight alcohol, loud music, dancing, and close contact for long periods).
- The Scottish Government is working with stakeholders to finalise a definition that will ensure the intended public health benefit, but not result in market distortion or displacement.
- We completely understand how difficult it has been for the night time industries over the course of the pandemic, they have felt the impact of restrictions more than most.
- We will continue to engage with the industry on implementing a robust, effective and proportionate certification scheme to be in place later this month.

adult entertainment venues

- We know that the virus spreads when we are in close proximity to others, and where there may be less well ventilated areas. That is why we consider adult entertainment venues to be appropriate for the use of Covid certification, to protect staff, customers and the broader general public.

ISSUE 10: INTEROPERABILITY ACROSS RUK

[REDACTED] top lines

- We recognise that it will be important to have consistency for schemes that might operate across the UK so that our citizens can travel easily between parts of the UK; and we have designed our app to offer interoperability across not just the UK but the Common Travel Area, which includes Ireland too as well as the Crown Dependencies.
- However, it is wholly right and appropriate that we design a scheme that is right for Scotland and works in our context and offers us the flexibility to adapt to our changing circumstances.

ISSUE 11: PEOPLE WHO HAVE BOUGHT SEASON TICKETS ALREADY

[REDACTED] top lines

- [REDACTED]
- [REDACTED]

ISSUE 12: INCREASING VACCINATION UPTAKE IN YOUNGER PEOPLE

[REDACTED] top lines

- We are working to make it as simple as possible for people to get their vaccines, and are increasing the options available for how and when people choose to be vaccinated, such as drop-in and open-access clinics.
- There is a wide range of places to get vaccinated including at drop-in mobile centres which have visited a range of sites such as football grounds, parks, workplaces and shopping centres.
- In addition, health boards are striving to maximise vaccine uptake by supporting outreach in food banks, religious centres and workplaces, and we are working with large employers to encourage uptake among their staff.
- We have engaged with young people in a variety of ways, including social media, to make sure they have access to the correct information on vaccines.

[REDACTED].

- Specific work ongoing with Education officials to ensure appropriate messaging is available to schools and local authorities, and key stakeholder groups including teaching unions and parent and young people representative groups.

ISSUE 13: HOW WILL THE SCHEME BE ENFORCED

[REDACTED] top lines

- We propose that the regulations will be drafted to impose a legal obligation on the person responsible for operating the business or venue to 'take all reasonable measures' to restrict entry only to those fully vaccinated (unless exempt). [REDACTED]

- We will publish guidance to help set out what ‘reasonable measures’ would be proportionate in different settings (for example, what is proportionate on entry to a nightclub of 200 people may not be proportionate – or possible – in an event crowd of 60,000).

ISSUE 14: ADDRESSING EQUALITY ISSUES

[REDACTED] top lines

- We do not underestimate the ethical, equity and human rights issues associated with Covid status certification.
- We are taking an equality and human rights approach to ensure the policy does not inadvertently disadvantage any community.
- children and people with particular medical conditions would be exempt, as well as those on clinical trials.
- under 18s will be exempt
- We have engaged extensively with equality, human right and disability organisations and continue to do so.
- We have also taken forward a number of workshops and engaged with a wide range of stakeholders to ensure that both the app and paper certificate are as assessable as possible.
- in July the Cabinet Secretary for Health and Social Care chaired an Equality and Human Rights Roundtable.
- We have also drawn on evidence from the Ada Lovelace Institute and public polling.
- If parliament agrees that certification should be introduced, we will publish and Equality Impact Assessment (EQIA) alongside the regulations.
- We are working proactively with health boards and we have encouraged them to build partnerships with local organisations and undertake assertive outreach for communities less likely to come forward for their vaccine in the clinics.

young people

- we have engaged children and young people’s stakeholders on the development of the policy and the app and their feedback has been built into the design of both.
- We’ve also been drawing on pre-existing data about the experiences of children and young people throughout the pandemic and applying that to certification.

womens' aid

- We have engaged with Scottish Women's Aid and will continue to seek the expert advice of women's organisations.

disabled people

- We are engaged with the Digital Inequalities and Inclusion group and the Information Commissioner's Office to learn what potential positive and negative impacts certification could have on disabled people and those with learning disabilities. We are continuing this engagement as we work on domestic certification.

Accessibility of Vaccinations

- **[REDACTED]**

- Scotland has run an inclusive vaccination programme. Inclusion is embedded in the national COVID-19 vaccination programme, and there are close partnerships with Health Boards and other partners to develop an approach that is accessible and adaptable.
- There has been extensive outreach to groups and communities that have been either reluctant or had difficulties in coming forward for their injections. With one of the highest vaccination rates in the world, this has been a great success.

BACKGROUND / ADDITIONAL INFORMATION

PEOPLE VACCINATED OUTSIDE SCOTLAND: Background

- **[REDACTED]**

Q&A

Q - Will the Scottish scheme recognise individuals who were vaccinated with MHRA approved vaccine in other countries?

- Yes. There is work in hand to secure an automatic digital solution for a single dose administered elsewhere in the UK, but until this is operational we will put in place to enable any Scottish resident who has had a dose outwith Scotland to have their vaccine record updated.

Q – will this be available before any scheme goes live

- Yes. We recognise the importance of having a mechanism in place to resolve this prior to a scheme going live.

Q – what about vaccines delivered outwith the UK?

- We will ensure that Scottish residents who have received an approved vaccine from the Common Travel Area (CTA) will have their vaccine status amended.

Q – What about vaccines administered outwith the CTA?

- Not all vaccines are approved, nor has there been International agreement on how each country should treat vaccines delivered by others. On that basis clinicians currently made a decision on a case by case basis on whether a vaccine administered by a country outwith the CTA should be recorded within an individual's vaccination record or whether they should be given a full course of a MHRA approved vaccine.

Q: How do we validate documents which could be in a foreign language?

The details around this are being developed.

Q: How will this scheme impact upon large international events hosted by Scotland (specifically COP26) and will there be any exceptions?

- We continue to work with UK Government, Glasgow City Council and other delivery partners on the arrangements for delegates attending COP.

The Blue Zone (invited delegates) will not be in scope of this scheme but elsewhere any events that meet the certification criteria will be in scope. With regard to COP events outwith the blue zone being in scope, if these are business events, which attendees need to attend for work purposes, as per the proposed exclusion of business events, they will not be included, however non business COP events will required certification.

MEDICAL EXEMPTIONS: BACKGROUND

Q: How would people get an exemption?

The details are still to be developed. This will likely involve people applying for an exemption, with health professionals having some degree of involvement in verifying their request. You should not contact your GP

Q: How will individuals prove their eligibility to be exempt?

Details are still to be developed. Information on an individual's eligibility for exemption could be automatically drawn from their medical records.

Q: Will exemptions be given to individuals who refuse vaccination on ethical or religious grounds?

The details are still to be developed. We encourage everyone who can be vaccinated to take up the offer. The vaccine is the best way out of the pandemic and protecting both yourself and those around you.

Q: Some people believe that vaccination is detrimental to public health, such as anti-vaxers, and could claim that this is a protected belief under human rights legislation. Will they be given an exemption?

- We appreciate that some people have concerns about the vaccine. However we encourage everyone who can be vaccinated to take up the offer. The vaccine is the best way out of the pandemic and protecting both yourself and those around you.

Q: How will exemptions be displayed?

- The app and exemptions process are still being designed and finalised.
- When the domestic app is developed, we do not envisage details of medical exemptions being displayed in order to protect an individual's privacy, we envisage this would be dealt with in the back end of the app, and an exempt person's Certification would look the same as vaccinated individuals.

Q: Will exemptions be similar for the digital and paper certificate?

- The exemptions process is still being designed, as are the digital and non-digital certification routes, but exemptions are a key priority for ensuring that certification does not discriminate against those who cannot be vaccinated for age or medical reasons, or if they've participated in a clinical trial.
- We envisage that the digital and paper certificate would look very similar.

CLINICAL TRIAL EXEMPTIONS – BACKGROUND:

- [REDACTED]
- [REDACTED]

Q. Will those exempt from vaccination be required to take a test?

- [REDACTED]

ISSUE – EXPIRY DATE / SUNSET CLAUSE? BACKGROUND

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

Issues/Sensitivities

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

- [REDACTED]