



Vaccine passports must meet highest level of privacy protection

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Privacy should be front and centre as governments and businesses consider COVID-19 vaccine passports as a tool to help Canadians return to normal life, say Canada's privacy guardians.

Vaccine passports would allow people to travel and gather again and could support economic recovery while protecting public health. They would, however, require individuals to disclose personal health information about their vaccine or immunity status in exchange, potentially, for access to goods and services, for example, restaurants, sporting events and airline travel.

"While this may offer substantial public benefit, it is an encroachment on civil liberties that should be taken only after careful consideration," federal, provincial and territorial privacy commissioners and the ombuds of Manitoba and New Brunswick say in a [joint statement](#) issued today.

"Vaccine passports must be developed and implemented in compliance with applicable privacy laws. They should also incorporate privacy best practices in order to achieve the highest level of privacy protection commensurate with the sensitivity of the personal health information that will be collected, used or disclosed," the statement says.

The statement was endorsed during the annual meeting of federal, provincial and territorial access to information and privacy guardians. The Manitoba Ombudsman hosted the meeting, which took place virtually given the pandemic.

This statement outlines fundamental privacy principles that should be adhered to in the development of vaccine passports.

In particular, it notes that, in light of the significant privacy risks involved, the necessity, effectiveness and proportionality of vaccine passports must be established for each specific context in which they will be used.

In other words, vaccine passports need to be shown to be necessary to achieve the intended public health purpose; they need to be effective in meeting that purpose; and the privacy risks must be proportionate to the purpose, i.e. the minimum necessary to achieve it.

Further, vaccine passports, whether introduced by governments or public bodies for public services, or by private organizations, need to have clear legal authority. In addition, organizations considering vaccine passports should consult with the privacy commissioners in their jurisdiction as part of the development process.

The statement also notes that any personal health information collected through vaccine passports should be destroyed and vaccine passports decommissioned when the pandemic is declared over by public health officials or when vaccine passports are determined not to be a necessary, effective or proportionate response to address their public health purposes. Vaccine passports should not be used for any purpose other than COVID-19.

Related Documents

[Joint statement – Privacy and COVID-19 Vaccine Passports](#)

For more information:

Office of the Privacy Commissioner of Canada

[Manitoba Ombudsman](#)

Provincial and territorial privacy Ombudspersons and Commissioners

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