Katten

FIRM NEWS

Lawyer Monthly Discusses UK Vaccine Passport Privacy Concerns With Christopher Hitchins

August 4, 2021

As vaccine passports begin to rollout in the UK and EU, *Lawyer Monthly* spoke with London managing partner Christopher Hitchins on potential issues employers face as they navigate the vaccination statuses of their employees. Christopher Hitchins notes that in addition to watching for discrimination pitfalls, employers need to be mindful of how the management and storage of this personal data intersects with General Data Protection Regulation (GDPR). "According to the UK data protection regulator (the ICO), the reason for recording your employees' vaccination status must be clear and necessary. If you have no specified use for this information and are recording it on a 'just in case' basis, or if the employer can achieve their goal without collecting this data, they are unlikely to be able to justify collecting it." And for employers looking to mandate vaccine passports, he added that they will need to take all due care to avoid altering the treatment of employees based on their COVID-19 records. ("Vaccine Passports: What Are the Implications?," August 2, 2021)

CONTACTS

For more information, contact your Katten attorney or any of the following attorneys.



Christopher Hitchins
+44 (0) 20 7776 7663
christopher.hitchins@katten.co.uk

Attorney advertising. Published as a source of information only. The material contained herein is not to be construed as legal advice or opinion.

©2026 Katten Muchin Rosenman LLP.

All rights reserved. Katten refers to Katten Muchin Rosenman LLP and the affiliated partnership as explained at katten.com/disclaimer.