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Will the government link Aadhaar to COVID-19 vaccination? More importantly, should it?

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A woman takes an iris scan to link her Aadhar card with the National Register of Citizens in Barpeta district in Assam on 10 August 2019. DAVID TALUKDARAFP/GETTY IMAGES

COVID-19



[\(/covid-19\)](#)

As India prepares logistics for the distribution of an eventual COVID-19 vaccine, there are lingering doubts about whether the government will link Aadhaar to the process. The health ministry issued guidelines in October which suggests the government is leaving a window open to connect people's Aadhaar data to their vaccination status.

On 26 October, in an order to the chief secretaries of all states and union territories Rajesh Bhushan, the union health secretary, wrote that the National Expert Group on Vaccine Administration COVID-19 or NEGVAC had "envisaged that the Vaccine will be first prioritised for Health Care Workers followed by other front-line workers and age groups." Data of healthcare workers is being registered in an

application called the COVID-19 Vaccination Beneficiary Management System or CVBMS. This will run parallel to India's long standing Universal Immunisation Program while using the vaccine monitoring technology and mechanisms already in place for the UIP.

Prior to the 26 October order, the government also circulated a set of guidelines which states, districts and union territories have to follow while collecting healthcare workers' data—including name, gender, mobile number and postal code. The health ministry directed health authorities to complete the data uploading process by the end of October. The guideline mentions ten types of photo identification that the government will accept with the notable absence of an Aadhaar card. The guideline notes that "Aadhar details will not be recorded but will be required/mandatory at the time of vaccination." The document mentions Aadhaar three more times. It asks healthcare workers to submit their name as listed in the Aadhaar database, that they preferably submit a phone number linked to the database and that a healthcare worker's current address may not be the same as that in her Aadhaar card.

Devdutta Mukhopadhyay, an associate counsel with the Internet Freedom Foundation, believes that the government intends to link COVID-19 vaccination status with Aadhaar. She said that this intent is evident in the fact that healthcare workers were asked to bring their Aadhaar card during vaccination and that the government wanted their names and phone numbers recorded to match the Aadhaar document. "Official identifiers like Aadhaar are a form of sensitive personal data and the government cannot collect them unless there is a clear and specific purpose recognised by legislation for doing so."

Once the guidelines were issued, news reports quoted (<https://www.livemint.com/science/health/covid-19-vaccination-in-india-frontline-workers-to-get-priority-aadhaar-not-mandatory-11604747428137.html>) anonymous official sources about the database being eventually linked with Aadhaar for the purpose of authentication and "to avoid duplication and to track beneficiaries." Senior health department officials from Odisha

<https://www.newindianexpress.com/states/odisha/2020/nov/02/odisha-plans-to-administer-covid-19-vaccine-to-over-three-lakh-healthcare-workers-2218445.html>) and [Maharashtra \(https://timesofindia.indiatimes.com/city/pune/vaccine-distribution-to-be-linked-with-aadhaar-cards/articleshow/79139539.cms\)](https://timesofindia.indiatimes.com/city/pune/vaccine-distribution-to-be-linked-with-aadhaar-cards/articleshow/79139539.cms) also told reporters that healthcare workers' Aadhaar card details would be linked to the database. Pradipta Kumar Mohapatra, the additional chief secretary for Odisha, told me in mid-November that the state has collected the details of more than three lakh twenty thousand healthcare workers. State health officials are now awaiting a link to the CVBMS onto which the data can be uploaded. Mohapatra confirmed reports that the state intends to link the healthcare workers' Aadhaar details with this database. "District level data collectors are filling the required details for now. Most of our healthcare workers have an Aadhaar card so it will be linked to the database without trouble," he said.

Most administrators, health officials and nodal officials who I spoke to were evasive about the use of Aadhaar. No official from the health ministry or member of the NEGVAC has made a statement on the role of Aadhaar in the vaccination process. I emailed Bhushan and Veena Dhawan, the joint commissioner for immunisation. I also emailed Prem Singh from the National COVID-19 Cell, whom the guideline lists as the contact person for queries about data collection. None of them had responded at the time this story was published.

A state-level UNDP official, who asked not to be identified, told me that no official will make a definite statement on the issue. "I advise you to move on," he said over the telephone in early November. He said that state health officials and UNDP officials had discussed plans to link Aadhaar with COVID-19 immunisations at some point. "This is a process. Nothing is completely finalised yet. But there are plans in place where Aadhaar will be used to track and validate beneficiaries who will be sent a one-time password for authentication," he said. He added that health officials would not explicitly ask for Aadhaar details because that would place the process under public scrutiny.

An immunisation officer in Maharashtra who also asked not to be named said, “It is a highly sensitive issue. There were conversations in a few meetings about linking Aadhaar with the database, but for now we are just carrying out the centre’s orders, collecting data but not Aadhaar details of healthcare workers.”

The centre has introduced digital services specific to the COVID-19 vaccine. On 8 December, Bhushan announced (https://www.youtube.com/watch?v=aJyJ3gJuNOc&ab_channel=PIBIndia) that the government had developed an application called Co-WIN that can be downloaded for free by those who wish to get vaccinated. The app will be used to monitor the vaccine delivery system and keep track of vaccination statuses of beneficiaries. It will also generate electronic vaccination certificates with two-dimensional barcodes called quick response codes or QR codes for easy verification.

At around the same time, the health ministry issued operational guidelines for COVID-19 vaccination. These guidelines set out an authentication process according to which beneficiaries need to provide their Aadhaar card or other photo identification to register themselves with the Co-WIN app. However, the document says that “the beneficiary can download and get the certificate of COVID-19 vaccination from ‘Common Service Centres (CSC)’ by providing the Aadhaar number.’ It does not mention a way for an individual to get a certificate without Aadhaar. The health ministry’s operation guidelines say if a person does not have Aadhaar, then vaccination officers can use other documents to verify his or her demographic details.

The big question that arises about the possible linking of Aadhaar with COVID-19 immunisation is whether people will be denied other services if they cannot demonstrate, through the Aadhaar system, that they have been vaccinated? Reetika Khera is a social scientist and economist at the Indian Institute of Technology in Delhi who has been documenting people’s exclusions from welfare schemes due to

Aadhaar since it was introduced. She has published (<https://www.epw.in/author/reetika-khera>) a series of articles and uploaded (https://www.youtube.com/playlist?list=PLdHEUXbHHVe3owNaeZqdbo4XyJ5j3_ehc) more than 50 case studies on her YouTube channel. These tell stories of people who have lost out on jobs through the Mahatma Gandhi National Rural Employment Guarantee Act Scheme, the national programme that guarantees people the right to work, due to problems with Aadhaar authentication. She has also shown how people have lost subsidised ration cards and pensions. In one of her case studies from 2016, a family in Hyderabad was unable to claim (https://www.youtube.com/watch?v=LSlOv9Xc5Pw&list=PLdHEUXbHHVe3owNaeZqdbo4XyJ5j3_ehc&index=22&ab) monthly ration because of a technical failure in the biometric machine at their local fair price shop. Another video uploaded in August 2018 showed (https://www.youtube.com/watch?v=KYwDkZol4wY&list=PLHq_BgI4X9JK8445_LqkmQJ8OFKWmFTN-&index=54&ab_channel=ReetikaKhera) how a visually impaired boy was denied services in rural Odisha.

“Today we have ample evidence of Aadhaar causing pain without gain in welfare,” Khera said. “Why would you repeat such a mistake by linking it with a vaccine?” Khera envisioned ways in which Aadhaar integration would exclude people from vaccination, which is an essential public health exercise. “Many, including bedridden people, who never managed to enrol, the elderly, workers suffering from a health condition for whom biometrics did not work at time of enrolment and finally people who notionally have Aadhaar but effectively not because their demographic or biometric details have been wrongly recorded in the Aadhaar database will be adversely affected,” she said.

For all its obvious problems, the idea of connecting Aadhaar to COVID-19 vaccination has lingered in public debate. This new attempt towards Aadhaar integration, Khera said, is a convenient way to use state machinery to gather health data. “Health surveillance of this kind

that they have in mind is not in public interest,” she said. “Any public health person will tell you that such data collection and centralisation of data is likely for use by companies, like private health insurance, to the detriment of people, especially poor people. In the absence of a robust privacy law, which people understand and can use, this amounts to using public resources for private gain.”

Two prominent public figures supporting the idea of linking Aadhaar to COVID-19 immunisation are Nandan Nilekani and Kiran Mazumdar-Shaw—both technologists and entrepreneurs. Nilekani is the architect of Aadhaar and the founding chairman of the Unique Identification Authority of India which implements the scheme. In an [interview \(https://indianexpress.com/article/india/nandan-nilekani-coronavirus-vaccine-tracker-health-sector-economy-6779867/\)](https://indianexpress.com/article/india/nandan-nilekani-coronavirus-vaccine-tracker-health-sector-economy-6779867/) with the *Indian Express* published on 19 October, Nilekani laid out a detailed proposition for integrating Aadhaar with the COVID-19 vaccination process, where all beneficiaries will be authenticated with Aadhaar, and data including “the name of the person, the name of the vaccinator, which vaccine was used, what time, date, location, will be recorded,” and uploaded to on the cloud. Nilekani also proposed that a digital certificate as proof of vaccination be sent to beneficiaries, which can be produced at “job interview, airport, railway station, bus stand etc”, because he said it is “not only important that I am vaccinated, it is also important that you know that I am vaccinated.”

The idea that an Aadhaar-linked vaccination status can determine whether a person can get a job, can get on a plane or train or avail of other services is dangerous. It implies that a job interviewer, the person at the airplane ticket counter, the railway clerk and bus collector can turn away a person who does not have this vaccination certificate. I emailed Nilekani about whether allowing the use of Aadhaar as a vaccine certificate could lead to exclusions, whether its use in the absence of data protection laws was a threat. He did not reply.

“A COVID-19 vaccine is an essential public service and as a general rule, persons should never be mandated to get a vaccine or compelled in any way,” said T Sundararaman, a former executive director of the National Health Systems Resource Centre, a body that provides technical assistance to the National Rural Health Mission. Sundararaman has been researching public health in India for decades. He said that information such as immunisation status can be considered sensitive and should not be divulged indiscriminately to private players. “Perhaps an employer with genuine public health and safety concerns might ask for such information, but again the decision to disclose such information should be made by the individual,” he said.

Mazumdar-Shaw is chairperson and managing director of the biotechnology company Biocon. She has been vocal in her support of Aadhaar for COVID-19 vaccinations on social media, where she has a large following, and in her interviews to news media. In an interview (https://www.youtube.com/watch?v=fzpUBanrZFs&t=1437s&ab_channel=MOJOSTORY) with journalist Barkha Dutt, she called Aadhaar the “digital backbone” with which to “track and trace these people.”

The government will need to maintain a record of COVID-19 immunisations but the need to trace and track people might be overstated. For one, keeping track of people getting vaccines is very different from tracing people who have infections and their contacts. Most people want to get vaccinated so that they can resume economic and social activity. Moreover, there is little worry that people will try to get more than their allotted doses. “Do you think people will just keep returning for another dose of the vaccine again and again?” Yogesh Jain, a paediatrician and founding member of the health support group Jan Swasthya Sahyog, asked. “Have we ever seen that occur with other immunisation drives, where a mother brings her child to get vaccinated twice?”

I wrote to Mazumdar-Shaw asking her to further explain why she thought Aadhaar must be used for surveillance of vaccine beneficiaries.

In her email response, Mazumdar-Shaw said that we would have multiple vaccines with multiple profiles being launched at different times. “The abbreviated timelines of development simply does not provide us with the complete data required to have interchangeable vaccines,” she wrote. “For example, if vaccine A shows a short durability of response and vaccine B shows a long durability of response, it will be important to have a database that shows who received vaccine A and therefore need to be revaccinated at the right time,” she wrote. She also said that Aadhaar was a “ready-made system we can use instead of trying to develop a standalone electronic tag” and that it would allow for a consolidated database comparing durability of different vaccine candidates. While Nilekani is asking for Aadhaar to provide a vaccination certificate based on which people can be allowed to participate in various activities, Mazumdar-Shaw wrote to me that no one will leverage vaccination data to use against anyone.

Mazumdar-Shaw’s reasoning ignores the enormous success of India’s Universal Immunisation Programme that has run for 35 years without Aadhaar. It has achieved high rates of immunisation—above consistently above 80% and reaching above 90% in recent years for the BCG vaccine and the vaccine against diphtheria, pertussis and tetanus. The biggest success of the programme was India being declared polio-free in 2014. The programme depends on community healthcare workers such as the Accredited Social Health Activists or ASHAs and the Auxiliary Nurse Midwives or ANMs to administer regular immunisation campaigns, maintain record of beneficiaries and monitor their health. They manage logistics of mass immunisation through the electronic Vaccine Intelligence Network or eVIN app. The health ministry [calls \(https://pib.gov.in/PressReleasePage.aspx?PRID=1643172\)](https://pib.gov.in/PressReleasePage.aspx?PRID=1643172) the eVIN a “state-of-the-art technology” with “a strong IT infrastructure.” The eVIN app is being used in 32 states and union territories.

Sundararaman told me that the COVID-19 immunisation programme will need robust surveillance and digital records. This already exists under the existing immunisation system. “This surveillance does not

need to be done through Aadhaar. The post marketing data on the vaccine's efficacy and durability can be recorded without the Aadhaar," he said.

Nilekani and Mazumdar-Shaw make technocratic arguments. But a good mass immunisation programme needs to factor in what works on the ground in terms of public health and social welfare. More importantly, it must factor in what does not work. Khera's work has repeatedly shown that Aadhaar creates a barrier to rights and services where there was none before. This fact is the basis for the Supreme Court ruling in 2018 that Aadhaar cannot be a mandatory condition to provide any service; the absence of Aadhaar or an authentication failure cannot be used to deprive anyone of welfare benefits. Using Aadhaar for authentication is also problematic because the system is not entirely secure. For instance, people have used (<https://www.thequint.com/cyber/pm-kisan-scam-aadhaar-riteish-deshmukh-hanuman-pakistan-spy-get-cash-as-farmers#read-more>) Aadhaar numbers available in the public domain to falsely register as beneficiaries under government schemes.

Jain believes that proponents of Aadhaar wield the scheme like a hammer looking for nails. "They might have found just another nail here in the form of the vaccine," he said. "For a potential vaccine, whose safety and efficacy is still unknown to us, the fact that the government will worry about misuse of resources and authentication is laughable," he said.

Even though a person's vaccination status might not be the most sensitive information, there is still a lot of stigma around COVID-19. This means we need to be careful about where this information is linked and with whom it is shared. Khera asked, "What do they even intend to do with such a vaccine passport, if the knowledge is not to be used in any way?"

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Akshit Chawla
[21 Dec, 2020](#)

Great piece!
I'm still wondering how does the current system of surveillance of polio or other vaccines work, how do you record individuals who are vaccinated? Would it mean recording any ID proof of that person?

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