



**By email**

[cj-editor@biggeesblog.cymru](mailto:cj-editor@biggeesblog.cymru)

Our ref: 28/08/nm/1123

09 September 2020

Dear Wynne Jones,

**Re: Covid-19 – Test Trace and Protect [T T P] Programme – Data Protection Impact Assessment**

Thank you for your email dated 27 August 2020. In accordance with Section 1(1)(a) of the Freedom of Information Act 2000 (the Act), I can confirm that Public Health England (PHE) does not hold the information you have specified

**Request**

***Clarification has now been received from the Information Commissioner's Office [I C O] regarding "Data Protection Impact Assessment [D P I A]" requirement for the above programme. I am advised by I C O that the programme is operating under the joint controller-ship of a number of organisations. I am also advised that the genetic data [DNA – deoxyribonucleic acid] harvested from nasal / throat swab under the programme constitutes the personal data of the individual to whom it belongs and falls under the scope of the General Data Protection Regulations [G D P R] and Data Protection Act 2018. Accordingly, in your role as "data controller" under the Act, I would be grateful if you could arrange to provide me with the following information at your convenience.***

***A copy of the D P I A undertaken by Public Health England in respect of the genetic data [DNA] currently being harvested under the Covid-19 T T P programme.***

**Response**

I can confirm that PHE does not hold the information you have specified.

The Data Protection Impact Assessment (DPIA) is a process to help identify and minimise the data protection risks of a project. A DPIA is required for processing that is likely to result in a high risk to individuals. It is also good practice to do a DPIA for any other major project which requires the processing of personal data.

I have checked with the PHE's Head of Research Governance and we are not aware of any of PHE's COVID-19 research projects requiring a DPIA in relation to genetic data, mainly because most involve the isolation or amplification (through the

standard COVID-19 PCR test) of viral RNA/DNA rather than host (i.e. human) DNA, hence we do not believe there is a significant risk from processing of any personal genetic data.

If you have any queries regarding the information that has been supplied to you, please refer your query to in writing in the first instance. If you remain dissatisfied and would like to request an internal review, then please contact us at the address above or by emailing [foi@phe.gov.uk](mailto:foi@phe.gov.uk).

Please note that you have the right to an independent review by the Information Commissioner's Office if a complaint cannot be resolved through the PHE complaints procedure. The Information Commissioner's Office can be contacted by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely,  
FOI Team