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Wales

Freedom of Information request to Public Health Wales

FOI Reference:	FOI 389
Date request received	20 July 2020
Date information is due to be sent	17 August 2020

Information Requested:

Dear F O I Officer

Subject: Covid 19 Track and Trace - Capture and processing of personal data

I refer to the capture and processing of "personal data" under the Covid-19 track and trace strategy and the disclosure, by BBC News today, that personal data is being processed unlawfully in England, in that an "**impact assessment**" has not been undertaken as required. I would be grateful if you could arrange to clarify the position in Wales. Has an impact assessment been undertaken by "Public Health Wales" to ensure compliance with the data management principles set out in the Data Protection Act 2018 and General Data Protection Regulations. Guidance on the subject published by Information Commissioner's Office is attached for your information.

Clarification is required as private sector business in Wales [hotels / public houses and other leisure activities] are currently capturing and processing personal data without clear guidance / instruction on how to comply with statutes and regulations regarding the management of personal data.

Information provided for the answer:

Thank you for your recent request. I can confirm that Public Health Wales in conjunction with all partners and in consultation with the Information Commissioner has been involved in the development of a number of Data Protection Impact Assessments (DPIA) for the Test, Trace and Protect (TTP)

programme. These have been in place since the outset of TTP, but it is important to note that these documents are iterative and as such are under regular review as the whole programme evolves.

If you are unhappy with the service you have received in relation to your request and wish to make a complaint or request a review of the decision, you should write to the Corporate Complaints Manager, Public Health Wales NHS Trust, 3, Number 2, Capital Quarter, Tyndall Street, Cardiff, CF10 4BZ.

If you are not content with the outcome of your complaint or review, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by the Trust. The Information Commissioner can be contacted at:

Information Commissioner for Wales

2nd Floor
Churchill House
Churchill Way
Cardiff
CF10 2HH

Telephone: 029 2067 8400

Email: wales@ico.org.uk