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Freedom of Information request to Public Health Wales

FOI Reference:	FOI 423
Date request received	29 August 2020
Date information is due to be sent	29 September 2020

Information Requested:

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

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 including Public Health Wales, NHS Wales Informatics Service, local authorities and health boards. 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, I have been redirected by I C O to Public Health Wales 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 Wales in respect of the genetic data [DNA] currently being harvested under the Covid-19 T T P programme.

Information provided for the answer:

Thank you for your recent request for information.

Public Health Wales is a joint data controller with NHS Wales Informatics Service, Local Authorities and Health Boards in Wales and there is a DPIA in place for the

Test Trace Protect programme (TTP).

In terms of your request for;

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

Public Health Wales is not processing viral genomic data as part of the TTP, therefore no DPIA has been undertaken.

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