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Bwrdd Iechyd Prifysgol
Bae Abertawe
Swansea Bay University
Health Board

Cadeirydd Dros Dro/ Interim Chair: **Emma Woollett**
Prif Weithredwr/Chief Executive: **Tracy Myhill**

gofalu am ein gilydd, cydweithio, gwella bob amser
caring for each other, working together, always improving

Rydym yn croesawu gohebiaeth yn y Gymraeg ac yn y Saesneg. We welcome correspondence in Welsh or English.

Dyddiad/Date: 21st January 2020
Ein Cyf / Our Ref: 19-L-014

☎ 01639 648363

✉ FOIA.Requests@wales.nhs.uk

Paul Knight

[request-627744-e1a4c0b8@whatdotheyknow.com](#)

Corporate Services
Headquarters
1 Talbot Gateway
Baglan
Port Talbot, SA12 7BR

Dear Mr Knight,

I refer to your Freedom of Information Act Request acknowledged by ourselves on 16th December 2019. Your request sought information relating to information governance.

1. Please can send me a copy of the current subject access request acknowledgement/response letter that you use.

Please find attached (appendix 1).

2. Please provide a copy of the last 5 DPIAs completed

Data Protection Impact Assessments (DPIAs) are a tool to help identify and minimise the data protection risks of new projects.

When completing full DPIAs, the Health Board needs to be able to demonstrate robust arrangements with any third parties who process data on our behalf. This could include software developers, public sector partners, private service providers etc.

Section 43 of the Act sets out an exemption for the right to know if release of the information is likely to prejudice the commercial interests of any person (a person may be an individual, a company, the public authority itself or any other legal entity). Section 43 is a qualified exemption. That is, it is subject to the public interest test. We are therefore withholding the full DPIA reports due to the commercial sensitivity of the information contained within them.

The Health Board acknowledges that by publishing DPIA information this could help foster trust in its processing activities and improve an individual's ability to exercise their rights, however these reports contain commercially sensitive information which could be harmful to the third party suppliers concerned.



Pencadlys BIP Bae Abertawe, Un Porthfa Talbot, Port Talbot, SA12 7BR / Swansea Bay UHB Headquarters, One Talbot Gateway, Port Talbot, SA12 7BR

Bwrdd Iechyd Prifysgol Bae Abertawe yw enw gweithredu Bwrdd Iechyd Lleol Prifysgol Bae Abertawe
Swansea Bay University Health Board is the operational name of Swansea Bay University Local Health Board

In conclusion we feel that the public interest in withholding the information outweighs the public interest in releasing at this time.

However in order to be helpful we are disclosing information in summary form derived from the relevant reports and a copy of summary level data is enclosed (appendix 2)

3. Please provide a copy of any internal mandatory information governance training that you give to staff which was written in the last 2 years including presentation slides and videos and any other media

Most of the mandatory Information Governance training is undertaken via the e-learning module of ESR. This is an All-Wales package, the competency of which applicable to all NHS Wales staff. Swansea Bay UHB compliments this with a 45-minute video presentation. This video is much too large to send via e-mail but a copy is available on YouTube at the following address:

<https://www.youtube.com/watch?v=MCXY9xN1rfE>

4. A copy of any instructions given to staff members to reduce data security breaches, for example double checking work which was written in the last 5 years.

There is comprehensive advice & guidance for staff on all aspects of Information Governance on the Health Board's IG Intranet pages. We also have an IG Handbook available to staff which I have attached. Staff are bound by their contract of employment to read & abide by all IG-related policies & procedures, which are also attached (appendix 3)

5. A list of any policies implemented in the last 2 years within the organisation to help reduce the environmental impact that the organisation has?

Please find attached the Health Board's environment policy (appendix 4).

I hope this information is helpful. If you require anything further please contact us at FOIA.Requests@wales.nhs.uk.

Under the terms of the Health Board's Freedom of Information policy, individuals seeking access to recorded information held by the Health Board are entitled to request internal review of the handling of their requests. If you would like to complain about the Health Board's handling of your request please contact me directly at the address below or register your complaint via FOIA.Requests@wales.nhs.uk.

If after Internal Review you remain dissatisfied you are also entitled to refer the matter to the information commissioner at the Information Commissioner's Office (Wales), 2nd Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH. Telephone Number: 029 2067 8400.



Yours sincerely

A handwritten signature in black ink that reads "P. a. Wenger". The signature is written in a cursive, flowing style.

Pam Wenger
Director of Corporate Governance

