



GIG
CYMRU
NHS
WALES

Iechyd Cyhoeddus
Cymru
Public Health
Wales

RECORD OF PROCESSING ACTIVITY

2023

Honours Nomination Process

Reference number
(IG Team use only)

2022 118

Information Asset Owner
Board Governance Manager

Liz Blayney, Deputy Board Secretary and

Data Protection Impact Assessment

Introduction

Privacy by design is an approach to projects that promotes privacy and data protection compliance from the start. Unfortunately, these issues are often bolted on as an after-thought or ignored altogether. Public Health Wales addresses these concerns through the completion of a Data Protection Impact Assessment (DPIA) which is a legal requirement for all projects involving Personal Data / Personal Identifiable Information, where the processing is believed to present a high risk to data subjects.

Data Protection Impact Assessments

The Public Health Wales Data Protection Impact Assessment is a two stage process. Stage 1 is designed to allow you to determine whether or not the processing is high risk and so requires a full DPIA. For those projects that do not require a full DPIA, Stage 1 serves a 'Record of Processing' (ROP). For all projects that constitute high risk processing, Stage 2 goes into greater detail.

I.T. implications

It is essential that before any development work is carried out on any project, confirmation is received that it has been considered by the IM&T department and any necessary advice has been provided.

As a result on completion of Stage 1, all DPIA forms must be sent to the PHW IT service desk at phw.servicedesk@wales.nhs.uk

DPIA forms received directly by the Information Governance team without IT sign off will be returned.

Guidance notes

Detailed guidance on how to complete the DPIA can be found here. However it is strongly recommended that advice be sought from the Information Governance Team before you start work.

[GUI - Data Protection Impact Assessments - Guidance notes.docx](#)

Stage 1 – Initial screening

Brief, high level description of the project. Please include the date on which this processing is scheduled to start.

This Protocol supports the Welsh Government call for honours nominations (Birthday and New Year).

Within the United Kingdom there is an honours system which recognises people:

- Who have made outstanding achievements in public life
- Whose work has brought distinction to British life or enhanced the UK's reputation in their area or activity

The Welsh Government issues a call for nominations twice a year and honours will be awarded either as part of the Queen's New Years honours in January or as part of the Queen's Birthday honours in June. The Welsh Government has advised that nominations can be made at any time during the year to allow for early consideration against the criteria and to help strengthen submissions. Nominations will therefore be welcomed at any point during the year.

It is important that Public Health Wales has arrangements in place to allow us to make nominations to ensure that our staff can be recognised if deserved.

Anyone can nominate a person for an honour, but the critical criterion is that candidates should have genuinely added value, either in their local communities, or in Wales/the UK as a whole, or helped to raise the profile of Wales internationally. For those individuals that are nominated for contributions they have made in their job, their contributions should significantly exceed what would have been expected of them in fully carrying out the requirements of their job. Citations based solely on an individual going over and above what was expected of them in their job would also benefit from evidence of some contribution in charitable work, community activities or other public services.

The purpose of this protocol is to explain the arrangements for making a nomination within the organisation. A Public Health Wales Honours Nominations Panel has been established to consider nominations prior to their onward submission to the Welsh Government.

Data Protection Impact Assessment

It is important that there is a strong and diverse pool of candidates from across Wales and the organisation has an important role to play in ensuring this.

There is a requirement to ensure strict confidentiality when making nominations. When making a nomination the individual being nominated **MUST NOT** be informed.

Within the protocol, it states that any PHW member of staff could be putforward for a nomination based on the panels recommendation.

Data Sharing.

Organisation	Relationship (delete as appropriate)
PHW	Data Controller
Welsh Government	Data Controller

Where will this data be held?

One drive folders within the PHW domain.

Data Protection Impact Assessment

Screening Questions part 1. Type of processing

Question	Will this project entail any of the following?	Yes/No
A1	The use of systematic and extensive profiling or automated decision-making to make significant decisions about people?	No
A2	Processing special-category data or criminal-offence data on a large scale?	No
A3	Systematically monitoring a publicly accessible place on a large scale (e.g. CCTV)?	No
A4	The use of profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?	No
A5	Carrying out profiling on a large scale?	No
A6	The combining, comparing or data matching from multiple sources?	No
A7	The processing of children's personal data for profiling or automated decision-making or for marketing purposes, or to offer online services directly to them?	No
A8	The processing of personal data that could result in a risk of physical harm in the event of a security breach?	No

Question	Will this project entail any of the following, in combination with any of the criteria in the European guidelines?	Yes/No
B1	The use of innovative technology?	No
B2	The processing of biometric or genetic data?	No
B3	The processing of personal data without providing a privacy notice directly to the individual?	Yes – the individual is not permitted to be contacted to advise of a nomination. It's a confidential process.

Data Protection Impact Assessment

B4	The processing of personal data in a way that involves tracking individuals' online or offline location or behaviour?	No
----	---	----

Question	Will this project entail any of the following?	Yes/No
C1	The collection of individuals personal data on a large scale?	No
C2	The collection of personal data about vulnerable persons?	No
C3	Compelling or requesting individuals to provide information about themselves?	No
C4	Disclosure of information about individuals to organisations or people who have not previously had routine access to the information?	No
C5	The use of information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	Yes
C6	As a result of the processing, making decisions or taking action around individuals in ways which could have a significant impact on them?	No
C7	Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example health records, criminal records, or other information that people are likely to consider as private?	No
C8	Will the project require you to contact individuals in ways which they may find intrusive?	No
C9	Will the project involve the use of 'cloud' based services for the processing of personal data?*	No
C10	Is any processing of personal data to be carried out by a third party?***	No

Data Protection Impact Assessment

Screening questions part 2 - Data to be collected

Personal data (Table 1 below)	Yes?	Special Category data (Table 3 below)	Yes?
Name	Yes	Racial / ethnic origin	Yes
Address (home or business)	Yes	Gender	Yes
Postcode	Yes	Political opinions	No
NHS No.	No	Religious beliefs	No
Telephone number	Yes	Trade union membership	No
Email address	Yes	Physical or mental health	No
Date of birth	Yes	Sexual life	No
Payroll number	No	Criminal offences	No
Driving Licence [shows date of birth and first part of surname]	No	Biometrics; DNA profile, fingerprints	No
Photo / video / voice recording / other image	No	Test results	No
Sensitive data (Table 2 below)		Any other data to be collected	
Bank, financial or credit card details	No	Length of service with NHS	
Mother's maiden name	No	Length of service in current role	
National Insurance number	No	Date of leaving current post (if applicable)	
Tax, benefit or pension Records	No	Nationality	
Health, adoption, employment, school, Social Services, housing records	No		
Child Protection	No		
Safeguarding Adults	No		
Comments			
<p>Under Paragraph 15(1) of Part 2 of Schedule 2 of the Data Protection Act 2018 there is an exemption from Articles 13 and 14 of the UK GDPR and the requirement to provide transparency information in relation to the conferment of honours</p> <p>The information will be kept for 2 years after the honours round has been announced, after which it will be deleted.</p>			

Data Protection Impact Assessment

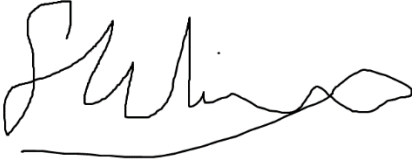

The data will be stored in a confidential folder on the Deputy Board Secretaries one drive, with access granted to the Board Secretary only.

Nominations are emailed to WG under confidential cover. (A secure gov.wales email address)

None of the above is to be collected:

Sign off

Data Protection Impact Assessment

Decision (delete as required)	Full DPIA Required Record of Processing only	
Completed by:	Signature: Liz Blayney	Date: 8/2/2024
Information Management & Technology	Signature	Date:
IT implications (to be completed by the IT department). If none, please enter N/A	n/a	
Information Governance Manager	Signature: 	Date: 8.2.24
Data Protection Officer	Signature: 	Date: 8/2/24

Stage 2 – Full Data Protection Impact Assessment

Data Protection Impact Assessment

Question 1 – More detailed description of the processing. Please provide Project Initiation Document or Business Case if you feel that it would help understanding.

Data Protection Impact Assessment

Question 2 - Legal basis for processing Personal Data and Sensitive Data Guidance note x

Please select **one** legal basis from the selection below (must be selected in all cases)

Title	Article	Necessity	Tick
Establishment Order	6(1)(e)		
Employment contract	6(1)(b)		
Consent	6(1)(a)		

Table 3 - Legal basis for processing Special Category Personal Data

In addition to the table above, please select **one** legal basis from the selection below if you are intending to process Special Category Data.

Title	Article	Necessity	Tick
Medical Purposes	9(2)(h)		
Public Health	9(2)(i)		
Employment obligations of the organisation	9(2)(b)		
Archiving/Research	9(2)(j)		
Explicit Consent	9(2)(a)		

Data Protection Impact Assessment

Question 3 – Data flow diagram

(Use this section to sketch out the flow of data. Keep the description as simple as possible (e.g. Data inputs – Data processing by PHW – Internal data sharing – External data sharing). If necessary or convenient, attached the data flow diagram as a separate document

Data Protection Impact Assessment

Question 4 – Additional documentation

Document	Required?	Attach document here
Data Processing Contract	Yes / No / Not applicable	
PHW Due Diligence Assessment	Yes / No / Not applicable	
Cloud Risk Assessment	Yes / No / Not applicable	
Cyber Essentials / Cyber Essentials Plus certification	Yes / No / Not applicable	
ISO27001 certification	Yes / No / Not applicable	
	Yes / No / Not applicable	
	Yes / No / Not applicable	

Data Protection Impact Assessment

Question 5 – Consultation proposals

(Use this section to describe what consultations have been undertaken or are proposed)

Data Protection Impact Assessment

Question 6 – Initial Risk Assessment

No	Organisational compliance risks	Score	Decision	Datix ref (if applicable)
1				
2				
3				
4				
5				

No	Data subject (privacy) risks	Score	Decision	Datix ref (if applicable)
1				
2				
3				
4				
5				

NOTE

All risks must be raised on Datix and managed in accordance with the organisations Risk Management Procedure.

Question 7 - Linking the DPIA to the data protection principles (Completion by the Data Protection Officer)

Principle	DPO Approval
Principle 1	
Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals..	
Principle 2	
Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.	
Principle 3	
Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. .	
Principle 4	
Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.	
Principle 5	
Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.	
Principle 6	
Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.	

Data Protection Impact Assessment

Sign off

Review sign off

To be signed off for each review (insert more if required)

Position	Name	Signature	Date	Next Review due
Project Manager				
Information Governance Manager				
Work required prior to next review				

Position	Name	Signature	Date	Next Review due
Project Manager				
Information Governance Manager				
Work required prior to next review				

Final sign off

Position	Name	Signature	Date
Project Manager			
Information Governance Manager			
Data Protection Officer			