

Digital Health & Care Wales (DHCW) processing activity in support the Ukrainian citizens coming to the UK

In order to provide support to Ukrainian citizens fleeing the conflict in Ukraine, the Welsh Government (WG) and public sector partners will be processing the personal identifiable data of those people and those who are sponsoring them to come to the UK.

The data will be collected from multiple sources, including UK Government departments, and directly from individuals.

The Welsh Government will be the data controller for the personal data it collects, and any personal data which is shared with them by UK Government departments.

Carrying out the Purposes will require the processing of Personal Data on the behalf of Welsh Government. DHCW will be the Data Processor. The table below provides details of the permitted processing to be undertaken in carrying out the Purposes.

DHCW will comply with any further written instructions from WG in respect of processing on WG's behalf.

Any such, further instructions shall be incorporated into the table:

Description	Detail
Legal Basis for Processing	<p>Article 6(1)(e) of UK GDPR – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.</p> <p>Part 2, Section 8(d) of the Data Protection Act 2018 – processing that is necessary for the performance of a task carried out in the public interest or in the exercise of the controller's official authority includes processing of personal data that is necessary for the exercise of a function of the Crown, a Minister of the Crown or a government department.</p> <p>If the processing involves special categories of data, the lawful basis is Article 9(2)(g) of UK GDPR – processing is necessary for reasons of substantial public interest. The corresponding substantial public interest condition is</p>

	<p>Schedule 1, Part 2, Paragraph 18 of the Data Protection Act 2018 – processing is necessary for the purpose of safeguarding children and individuals at risk.</p> <p>If processing involves processing of personal data relating to criminal convictions and offences the Welsh Ministers intend to rely on Schedule 1, Part 2, Paragraph 18 of the Data Protection Act 2018 – Safeguarding of children and individuals at risk.</p>
<p>Subject Matter of the Processing</p>	<p>Personal data about Ukrainian Citizens (and sponsors/hosts) will be processed for the purposes of providing support and assistance to those fleeing the war in Ukraine including finding suitable accommodation.</p>
<p>Duration of the Processing</p>	<p>Processing of the data will be reviewed every 6 months, or sooner if the support for Ukrainian citizens is no longer necessary.</p> <p>The Welsh Ministers will notify DHCW when (i) they determine that the processing of the disclosed data is no longer necessary for the agreed purpose or (ii) they determine that the current requirement to support Ukrainian people has come to an end</p>
<p>Location of Processing</p>	<p>The data will be processed within the United Kingdom and will not be transferred outside the UK unless it is in accordance with Condition 2.6.6.</p>
<p>Nature of the Processing</p>	<p>Data received from UK Government will be processed and stored within the data platform to share with Welsh Government, the contact centre, local authorities, and local health boards.</p> <p>Additional and updated data, collected by the contact centre, will also be added</p>

	<p>to the system, linked to data provided by UK Government.</p> <p>Welsh Government, the contact centre, local authorities, and local health boards will have access to only the data they require to undertake their roles. This will include ensuring necessary checks have been undertaken, identifying suitable accommodation, and providing advice/guidance.</p> <p>In addition to the data being used for operational purposes, data will also be processed for the purpose of report to Welsh Minister and UK Government.</p>
Purposes of the Processing	<p>Personal data will be processed for the purpose of providing support and assistance to Ukrainian citizens fleeing the war in Ukraine. Personal data will be processed to:</p> <ul style="list-style-type: none"> • Provide advice and guidance to both Ukrainian citizens and sponsors/hosts to be located in Wales • Monitor Ukrainian citizens safe arrival and movement within Wales • Identify and provide safe and suitable accommodation to Ukrainian citizens • Ensure Ukrainian citizens have access to essential services they require • Ensure delivery of health related services to Ukrainian citizens arriving in Wales
Type of Personal Data to be Processed	<p>Data will include:</p> <p>For Ukrainian citizens:</p> <ul style="list-style-type: none"> • Name • Date of birth • Sex • Address • Email address

	<ul style="list-style-type: none"> • Phone number • Marital status <p>Details of anyone travelling with them</p> <ul style="list-style-type: none"> • Unique identifier • Passport numbers • Visa numbers • Details of mobility and other accommodation needs • Welcome Centre allocation • Travel arrangements • Confirmation of health checks complete <p>For Sponsors/Hosts:</p> <ul style="list-style-type: none"> • Name • Address • Date of birth • Sex • Contact information • Unique identifier • Details of anyone residing with the sponsor/host • Confirmation of DBS checks complete • Confirmation of property checks complete <p>Other:</p> <ul style="list-style-type: none"> • Confirmation of payment checks complete <p>Additional data fields may be captured or shared during the ongoing provision of support to Ukrainian citizens.</p>
Categories of Data Subjects	<p>Data subjects will include:</p> <ul style="list-style-type: none"> • Ukrainian citizens fleeing the conflict in Ukraine, including adults and children • UK residents who are sponsoring/hosting Ukrainian citizens based in Wales. • Audit information relating to those accessing the data platform
Plan for the return and/or destruction of the data once the processing is	Data will be retained whilst the Welsh Ministers consider that the provision of this information is necessary.

complete UNLESS requirement under Law to preserve that type of data	Once it is determined that it is no longer required, the Welsh Ministers will issue instructions on what should be done with any data shared for this purpose specified above.
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Under the UK General Data Protection Regulation, you have the following rights in relation to the personal information you provide us to enable to support you, specifically you have the right:

- to access a copy of your own data
- for us to rectify inaccuracies in that data
- to object to or restrict processing (in certain circumstances)
- for your data to be 'erased' (in certain circumstances)

As indicated not all rights are absolute.

If you have previously contacted WG or DHCW in regards to your rights and have been unhappy with the response then you can contact the Information Commissioners Office (ICO),

To lodge a complaint with the Information Commissioner's Office (ICO) you can contact them:

Via post:
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Via Phone: 01625 545 745 or 0303 123 1113

Via website - <https://ico.org.uk/>

Further information

If you have any further questions about how the data provided will be processed by DHCW or wish to exercise your rights using the UK General Data Protection Regulation, please contact the DHCW Data Protection Officer at:

Digital Health & Care Wales
Ty Glan y Afon
21 Cowbridge Road East
Cardiff
CF11 9AD

Email: DHCWInformationgovernance@wales.nhs.uk