

Reference:	FOI.16043.24
Subject:	Chaperone Policy
Date of Request:	22 November 2024

Requested:

Please send me a copy of your chaperone policy and any associated equality impact assessment. Please treat this request under FOIA 2000.

Response:

Hywel Dda University Health Board (UHB) has provided a copy of its Chaperone Policy at Attachment 1.

Also, the UHB has provided a copy of the associated Equality Impact Assessment at Attachment 2. However, the UHB has redacted some of the names of the staff members included within Attachment 2, as it would not be within the expectation of these individuals for their information to be released into the public domain. This information is classed as personal data of a third party. Therefore, it is being withheld in accordance with the exemption set out in section 40(2) of the FoIA, by virtue of section 40(3)(a) of the FoIA, which permits a public authority to withhold personal data other than the requestor's where the disclosure would breach Data Protection principles.

This information is protected by the Data Protection Act 2018 (DPA)/UK General Data Protection Regulations, as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and articles of the UK GDPR. This exemption is absolute and therefore, there is no requirement to apply the public interest test.

In reaching this decision, the DPA and UK GDPR define personal data as data that relates to a living individual who can be identified solely from that data or from that data and other information, which is in the possession of the data controller.