

Reference:	FOI.5327.21
Subject:	Mass Vaccination Centre safety risk assessments
Date of Request:	11 February 2021

Requested:

1. I am writing to request e-copies of the risk assessments you have carried out for the mass vaccination centres in Haverfordwest and Tenby.
2. Also, I would like to know whether the Welsh Government has provided any guidelines to you as a Health Board re: these risk assessments.
3. I am also checking to see whether ACH (Air Changes per Hour) - or any other specific measures of airflow - have been integrated into your risk assessments.

Response:

1. Hywel Dda University Health Board (UHB) has applied an exemption under Section 36(2)(c) of the Freedom of Information Act 2000 (FoIA) to part one of your request, which states that information being considered under this exemption, would or would be likely to, in the reasonable opinion of the UHB's qualified person, prejudice the effective conduct of public affairs.

In the case of the UHB, the qualified person is the Chief Executive.

The UHB considers that the disclosure of the risk assessments conducted for the MVCs in Haverfordwest and Tenby, would or would be likely to prejudice the effectiveness of the UHB's decision making and would be likely to inhibit the free and frank exchange of views for purposes of deliberation. As a public authority responding to a global pandemic, the UHB requires some discretion and flexibility in its ability to implement alternative options, in accordance with the situation presented.

The UHB has conducted risk assessments for each of the MVCs, however the documents themselves consider a number of various risks including site security, health and safety of staff and visitors, vaccine deliveries, data protection and risks around adverse effects following vaccination. Due to the complexity of the document and the information contained within it, it is deemed extremely sensitive, and as a result the UHB is withholding this information under Section 36(2)(c)(i) of the FoIA.

Section 36 of the FoIA is subject to the public interest test, applied as follows:

In favour of disclosure: There is a legitimate public interest in transparency and accountability of the ways in which public bodies operate and manage emergency planning in response to developing situations. This includes enhancing the public understanding of the steps taken by the UHB, building trust between the public and the UHB.

Against disclosure: Disclosure of this information would be likely to cause substantial harm to the UHB's ability to effectively manage and mitigate risks, as information would be disclosed pertaining to the finer details of its operational planning in response to the presenting circumstance.

Additionally, the UHB must be able to protect and preserve its operational security and patient and staff safety.

Decision: The UHB considers that the public interest in withholding the information is greater than the interest in disclosing it, and believes that there is wider established public interest in the Board's ability to make decisions, to plan and implement changes for all circumstances.

It has therefore been decided that releasing the information under FoIA, to which the UHB is subject, would be likely to impair the UHB's emergency planning and operation.

Whilst operating in accordance with the Chancellor's Code of Practice under Section 45 of the FoIA, the UHB has a duty to provide advice and assistance and therefore provides responses to questions 2 and 3.

2. The UHB confirms that no specific guidance has been issued by the Welsh Government (WG) in relation to risk assessments for the MVCs.
3. The UHB confirms that it is not aware of any specific measures of airflow or Air Changes per Hour (ACH), that were required or that have been integrated in to the MVC risk assessments.