



Mrs Michelle Nobes  
Information Governance Manager, Data Protection  
Officer (DPO)  
eHealth Department  
Kirklands Hospital  
Fallside Road  
Bothwell  
G71 8BB

20 May 2020

Dear Michelle Nobes,

**Data Governance standards for contact tracing webtool trials.**

We are writing to you to request information relating to the current trials you are undertaking of the contact tracing webtool from the Digital Health and Care Institute, and the Scottish Government.

Open Rights Group had previously written as part of a group of individuals and organisations working on privacy through law and technology, and as institutions committed to upholding human rights standards across Scotland. to the Scottish Government and the Digital Health and Care Institute, regarding the governance of the proposed webtool[1]. As the trials were announced earlier this week[2], ORG felt it important to raise similar questions asked by the group as you will be playing a key role in working hands on with the webtool and new system, ascertaining the effectiveness, reliability, and security of the webtool. We present you with versions of questions sent, lightly edited for your relevance as a health board involved in the trials

Please provide the Data Protection Impact Assessments carried out on the DHI webtool trial.

Please provide a copy of the Equality and Human Rights Impact Assessments carried out on the DHI webtool trial.

Please explain how this tool will be accessed and accessible by people with all levels of digital literacy and will be accessible to those who are visually impaired, during these trials

Demonstrate in a legally enforceable manner that, during the trial:

- The data collected will only be used for contact tracing in the context of the COVID-19 pandemic;
- Will not be used for any other purposes; and
- Will be deleted once the pandemic has concluded. In particular this data should not be accessed by the Police nor Home Office e.g., for immigration enforcement purposes.

Demonstrate that there is adequate, independent oversight of the trials, the webtool and that individuals are able to access their own data and bring complaints about how their data is being used to an independent oversight body.

Regards,

Matthew Rice,  
Scotland Director  
Open Rights Group

[1] <https://scotland.openrightsgroup.org/policy/2020/05/07/joint-letter-to-jeane-freeman-and-digital-health-and-care-institute/>

[2] <https://www.bbc.co.uk/news/uk-scotland-52698392>