

SUMMARY OF PROCESSING ACTIVITIES (ARTICLE 30)

Liverpool Women's Hospital NHS Foundation Trust

Introduction

This document summarises the types of personal information processed by the Liverpool Women's Hospital, where it is processed, under what circumstances and what factors are considered ahead of it being processed.

What does Processing actually mean?

'Processing' is a collective term meaning collecting, recording, organising, structuring, storing, adapting (or altering), retrieving, consulting, using, disclosing, disseminating (or otherwise making available), aligning (or combining), restricting, erasing or destroying personal information. The term processing will be referred to frequently within this document

Who are we?

The Liverpool Women's Hospital is a public organisation providing specialist medical services such as Gynaecology, Maternity, Fertility and Genetics services

Our name, address and contact details are:

Liverpool Women's NHS Foundation Trust

Crown Street

Liverpool L8 7SS

Tel: 0151 708 9988

www.liverpoolwomens.nhs.uk

What types of information is processed?

Personal data means any information relating to an identified or identifiable individual; an identifiable person is one who can be identified directly or indirectly.

Special category data means any information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union activities, physical or mental health, sexual life, genetic and biometric data.

What factors determine whether Personal Information is processed?

When considering whether to process **personal data** the Trust will first consider whether it is lawful to do so, which means the Trust must have a justification that is prescribed by the General Data Protection Regulations. If there is not lawful justification to process then the Trust will not process the **personal data**.

The Trust will also consider whether the type of processing activity is in line with the relevant Privacy Notice for that type of information and circumstances. Privacy Notices provide a more detailed overview of the processing according to the type of information processed. The Trust Privacy Notices are available via the Trust website at:

<https://www.liverpoolwomens.nhs.uk/about-us/use-of-your-personal-information/>

If there is legal justification to process and the processing is in line with the relevant Privacy Notice, the Trust will then use the principle of 'no surprises' which means that if the Trust were to inform an individual what the Trust is doing with their **personal data**, the individual would not be surprised at the answer. If it is believed that an individual would not be surprised then the Trust would then consider it is reasonable to process the **personal data** for that or those purposes.

The Trust will also take due account of the Caldicott Principles when processing the **personal data** of a patient, which is a set of guidelines governing the sharing of patient information. More information on the Caldicott Principles is available at:

<https://www.igt.hscic.gov.uk/Caldicott2Principles.aspx>

About who does the Trust Process Information?

Because the Trust is a healthcare provider, information about a number of different groups of individuals needs to be processed, which includes patients, staff, volunteers, students, suppliers of services and other service users. There are also a whole range of individuals and organisations that support the Trust in delivering its objectives as a healthcare provider.

Providing medical services is, of course, the primary purpose of the organisation and our staff who provide clinical services will need to process personal and sensitive information in order to do so. There may also be circumstances where personal information is shared with other individuals or organisations, which maybe because a patient's care is continuing elsewhere, or because the Trust is compelled to do so by the law.

Where is information stored and Processed?

The Trust has a number of clinical systems, which hold patient information and are used for the day to day clinical activity. As these systems primary purpose is to process the clinical management of patients, they will hold the full range of information. Each department within the Trust will also have systems and processes set up to manage the operational information within their own department. They may hold personal information if there is a need to do so and may, on occasion, hold sensitive information where there is a need to do so.

Sitting behind all of these systems is the Trust IT infrastructure, which provides the connectivity and structures to support the running of the Trust. Included within the infrastructure are systems and processes to protect the Trust from system failure and also from external threats such as viruses.

Some departments will extract information from the Trust systems and process it further in preparation for further use, such as the Clinical Coding department.

In addition, the Trust maintains an **Information Asset Register** of all key assets that contain personal and special category data, and **Data Flow Mapping** of the processing of the data. The lawful basis to hold and process the data is also recorded.

Overview of Processing Activities

Business Function	Purpose of Processing	Category of Individuals	Category of Personal Data	Category of Recipients
Clinical Services	To provide clinical services to patients	Medical Professionals, medical support staff, managers, administrative support staff	Medical Information	Other Healthcare organisations, Statutory regulators, supervisory authorities
Finance	To process the financing of the Trust	Managers, administrative staff	Financial information	NHS Authorities, Other Healthcare organisations, suppliers
Audit and Research	To maintain quality, measure standards and allow improvements	Medical staff, research staff, support staff	Medical information	Other research organisations
Governance	To maintain oversight of professional standards and requirements	Medical staff, support staff, management	Medical information, Details of incidents	Statutory regulators, monitoring authorities, supervisory authorities
Estates and Facilities	To ensure the safety and security of the premises	Management staff, security staff	CCTV images, Details of incidents, personal information	Police, local authority, supervisory authorities, statutory regulators
Health Records	To provide health record services to the clinical services	Management, administrative staff	Medical information	Other healthcare organisations
Information Technology	To provide the electronic infrastructure for the Trust IT systems	Management, administrative staff	Technical information, personal information related to IT usage	Organisation and individuals that provide technical support to the Trust
Legal Services	To provide legal services	Legal professionals, administrative staff	All and any type of information may be subject to processing	Courts, coroners, other solicitors
Human Resources	To manage staff who work for the Trust	Managers, Administrative staff	Personal information, references, professional registration records, capability, conduct and sickness	Organisations that provide support services such as Occupational Health, Payroll and Recruitment Services
Information and Performance	To support the organisations intelligence and performance monitoring	Managers, administrative staff	Personal information, medical information	Other Healthcare organisations, Statutory regulators, supervisory authorities