



**Liverpool**

**Clinical Commissioning Group**

Corporate Services

NHS Liverpool Clinical Commissioning Group

The Department

Lewis's Building

Renshaw Street

Liverpool

L1 2SA

Ref: 61174

5<sup>th</sup> September 2019

Email:

Email: [foi@liverpoolccg.nhs.uk](mailto:foi@liverpoolccg.nhs.uk)

Dear

### **Re: Freedom of Information Request**

Thank you for your Freedom of Information request that we received on 12<sup>th</sup> August 2019, with regards to Liverpool CCG's Information Governance Arrangements.

#### Request:

1. A copy of your 'Records of Processing Activity' (ROPA), as required under Article 30 of the General Data Protection Regulation

**Response: We are unable to provide this information as this is not a specific document at Liverpool CCG. The information is collected within other forms / documents.**

2. A copy of any Data Protection Impact Assessments/Privacy Impact Assessments you have undertaken between 1st January 2018 to 31st July 2018 (either where the CCG is the data controller or in respect of services you have commissioned)

**Response: Summaries are publicised on our website**

**<https://www.liverpoolccg.nhs.uk/about-us/publications/registers-and-policies/>**

3. A copy of your information asset register, if you have one

**Response: For security reasons we will not provide you with completed information asset registers. The headings used on the information asset registers are as follows:**

- Unique Reference Number
- Service Area
- Sub Service Area
- Name of Information Asset Owner & their job title
- Name of Information Asset Administrator who conducted the Risk Assessment (inc their job title)

- **Information Asset Detail**
- **Location of Information Asset**
- **Information Asset Storage Format**
- **Mitigation / Action Plan in place to reduce risk**
- **Common examples of risk to the data**
- **Risk likelihood**
- **Likelihood score**
- **Risk impact**
- **Impact score**
- **Severity score**
- **Risk profile**
- **Purpose of holding data**
- **Categories of individuals (data subjects)**
- **Categories of data**
- **If special category - type of data**
- **Is the processing linked to a contract / SLA with a client**
- **Is any data processed / held by third countries or international organisations**
- **Retention schedule of data in years**
- **Article 6 lawful basis for holding personal data**
- **Article 9 lawful basis for holding special category data (sensitive personal data) – if applicable**
- **Is a data protection impact assessment required**
- **Date of risk assessment**
- **Review date for risk assessment**
- **Comments on risk by exception**
- **Business continuity countermeasures for loss of information assets or service disruption**
- **Reference link to corporate risk register – if risk is deemed significant**
- **Associated critical system**
- **Sign off date IAO confirmed BCM arrangements for asset are in place**
- **Data quality initial assessment**
- **Complete**
- **Valid**
- **Has integrity**
- **Timely for its purpose**
- **Reliability**
- **Total score**
- **Total quality status**

4. A copy of any data flow mapping exercise you have undertaken

**Response:** For security reasons we will not provide you with completed data flow mapping exercises. The headings used for data flow mapping are as follows:

- Area/Section/Department
- Sending Organisation - Liverpool CCG
- Receiving Organisation
- Receiving Organisation – Other
- Sending Organisation (outside CCG)
- Sending Organisation – Other
- Receiving Organisation - Liverpool CCG
- Data Description
- Data Description – Other
- Nature of data
- Format of data
- How many Data Subjects
- How frequent is the data transfer?
- How is the data flow made?
- How is the data flow protected?
- Is the data processing linked to a contract/SLA with a client?
- Common examples of risk to the data
- Risk Likelihood
- Risk Likelihood Score
- Risk Impact
- Risk Impact Score
- Risk Score i.e. the risk of how the data flows
- Risk Profile
- Further Risk Mitigation Required: Action to be taken
- By Who
- By When
- Article 6 lawful basis for processing personal data
- Article 9 lawful basis for processing Special Category Data (sensitive personal data) - if applicable

5. A copy of your data sharing register, if you have one

**Response:** For security reasons we will not provide you our data sharing register. The headings used on our data sharing register are as follows:

- Ref
- Data Flow

- Data from
- Data to
- Type of organisation
- Name of sharing partner SIRO
- Nature of shared data
- Legal basis GDPR
- Legal basis (H&S Act 2012)
- Start date
- Date of expiry / renewal
- Status of sharing partners IG assurance
- Action plan to improve sharing partner's IG assurance
- Target date for achieving IG compliance
- Date target achieved
- Signed off by

6. A copy of your 'Data Processor Register' if you have one – (e.g. list of the organisations who act as a data processor as defined in the GDPR, for the CCG)

**Response:** Our Data Processors are listed on our website within our privacy notice

<https://www.liverpoolccg.nhs.uk/privacy-policy/>

7. A copy of your policy/procedures in respect of

a) Subject Access Requests

**Response:** This is accessible on our website

<https://www.liverpoolccg.nhs.uk/about-us/publications/registers-and-policies/>

b) Freedom of Information requests

**Response:** This is accessible on our website

<https://www.liverpoolccg.nhs.uk/about-us/publications/registers-and-policies/>

c) Information Security Incidents/Data Protection Impact Assessments

**Response:** This is accessible on our website

<https://www.liverpoolccg.nhs.uk/about-us/publications/registers-and-policies/>

d) Privacy Impact Assessments

**Response:** We do not have a policy by this name. All of our Information Governance Policies are accessible on our website

<https://www.liverpoolccg.nhs.uk/about-us/publications/registers-and-policies/>

8. A copy of any data sharing agreements signed between 1st January 2018 until 31st July 2018

**Response: Please see attached**

We wish to take this opportunity to inform you that a formal complaints and internal review procedure is available to applicants who are unhappy with responses provided to FOI requests. You can formally request an internal review within a reasonable period of time (2 calendar months) from the date this response was issued.

Where you are not satisfied with the decision of the internal review you may apply directly to the Information Commissioners Office (ICO) for a further review of that decision. Generally, the ICO cannot make a decision unless you have exhausted our complaints procedure in the first instance.

The ICO can be contacted at:

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.gov.uk](http://www.ico.gov.uk)

Should you require any further information, clarification regarding this response or do not feel that your request has been answered as you would expect, please contact us to discuss.

Yours sincerely,

**Corporate Services Team  
NHS Liverpool CCG**