

Information Governance

Trust Headquarters
Stephenson House
75 Hampstead Road
London
NW1 2PL

Tel: 020 3214 5852

FAO: Head Teacher

Our Ref: IG/CDL/GDPR-ASS-10

July 2018

Dear Head Teacher,

Thank you for contacting the Trust. I understand you have sought assurances concerning CNWL's compliance with the General Data Protection Regulation (GDPR).

The GDPR is a new European-wide law that replaces the Data Protection Act 1998 in the UK. It places greater obligations on how organisations handle personal data and enhances data subject rights. It came into effect on 25 May 2018.

The Information Commissioner has raised concerns that there is a lot of "misinformation" around the GDPR. Misinformation appears to be causing some unnecessary anxieties. This letter looks to provide the assurances sought from you, and others, in light of the enforcement of the new rules.

First, CNWL are committed to providing excellent integrated patient care. We are a large and diverse organisation, providing healthcare services for people with a wide range of physical and mental health needs.

The Trust employs approximately 7,000 staff to provide more than 300 different health services across 150 sites and other services in community settings. Our services cover:

- Common physical health problems
- Long-term conditions
- Mental health difficulties
- Learning disabilities
- Eating disorders
- Addictions
- Sexual health.

As a partner you ought to have confidence in the way we handle personal data. To this extent, please let me assure you:

- The Trust is a registered Data Controller with the information and privacy regulator, namely, the [Information Commissioner's Office](#).
- The Trust has appointed a qualified expert and leading authority as the statutory Data Protection Officer.
- The Trust is compliant with the Department of Health IG Toolkit in which CNWL is assessed against policies and standards. These standards extend themselves to the highest IT and security controls set by Whitehall.
- The Trust complies with the Department of Health retention schedule in accordance with the expectations of proportionate records management and data minimisation. We also adhere to retention agreements in any Information Sharing Agreement or Contract we might have with you.
- CNWL will never engage with a sub-processor without the prior written consent of the third party Controller/Joint-Controller.
- CNWL has implemented a GDPR Change Schedule which has been externally audited and praised.
- All staff are under an obligation of professional secrecy, privacy by contract, and the common law duty of confidentiality.
- All staff members undertake mandatory data protection training annually.
- The Trust has a published [Privacy Notice](#).
- CNWL only ever manages personal information fairly, lawfully and transparently.
- When data is shared with the Trust, CNWL complies with purpose limitations, instructions, expectations and the law.
- We will assist any partner in upholding the rights afforded to data subjects including the right of subject access.
- The Trust employs a robust methodology to ensure compliance with the information laws including Privacy Impact Assessments.
- **Crucially, the Trust has a legal basis for the processing of all personal data.**

The assurance above is by no means exhaustive – but nor does it have to be. The processing of personal data and the work undertaken with our partners continues. There ought to be no change to any service. Our policies and procedures are robust. And the Trust's compliance sound.

Where there is still any doubt, please contact me directly.

Best,

A handwritten signature in black ink, appearing to read 'Calum Liddle', with a small dot at the end.

Calum Liddle PhD (ABV), LL.M, BA (Hons), FRSA
Head of Information Governance
Data Protection Officer