



Liverpool Archdiocesan
Lourdes Pilgrimage
Association

Data Protection Policy

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Introduction

The Liverpool Archdiocesan Lourdes Pilgrimage Association (LALPA) will ensure that all Personal Confidential Data (PCD) and sensitive information obtained about its volunteers, staff and pilgrims is effectively managed and that appropriate policies, procedures, management accountability and structures provide a robust Information Governance (IG) framework.

This policy adheres to the requirements stated in the EU General Data Protection Regulation (GDPR) implemented in May 2018, enacted into UK Law in the Data Protection Act 2018. Whilst we are a separate charity to the Archdiocese of Liverpool, we also adopt their [Privacy and Data Policy](#) for continuity of practise.

Due to the nature of the organisation this policy applies to Medical Records obtained for or created in pursuance of managing the health and safety of all actual and potential pilgrims relating to our pilgrimage to Lourdes each year and encompasses all categories of volunteers, staff and pilgrims.

Scope

This policy guides the use of personal and sensitive information for the preparation and management of the pilgrimage both in England and while in Lourdes.

Information takes many forms, including data stored in databases, on computers (desktop, laptop or tablet); transmitted across networks; written on paper; sent by fax or email; stored on portable media; or spoken in conversations. This includes, but is not limited to all:

- information processed by the Pilgrimage in pursuit of all its pilgrimage activities.
- information processing facilities used in support of LALPA's activities to store (electronically or physically), process and transmit information.

The spirit of this policy applies to any emergent technology that will be used to support future pilgrimage administration. Future updates of the policy will be amended to consider any future changes of the Data Protection Law and other initiatives.

Responsibilities

- **The Pilgrimage Director**

The Pilgrimage Director has overall day-to-day responsibility for all aspects of the Lourdes Pilgrimage activities, and reports to the Trustees of the Pilgrimage Association.

The Pilgrimage Director incorporates the role of Senior Information Risk Owner (SIRO). In practical terms they are accountable for, and report to the Pilgrimage Trustees and Data Protection Officer (DPO) on issues of information risk within the Pilgrimage.

To this end, they must foster a culture for protecting and appropriate use of data; provide a focal point for managing information-related risks and incidents; and be concerned with the appropriate management of all information assets.

- **The Senior Medical Officer (SMO)**

The SMO, supported by the Healthcare Team Lead, takes responsibility for all clinical decisions made prior to and during the Pilgrimage to Lourdes.

They are supported by the Healthcare Team who co-ordinate all medical support for the pilgrimage, supported by the clinical data supplied by each pilgrim, which is available to them in written and/or digital form.

They have a responsibility to ensure that all clinical staff are aware of and discharge their responsibilities for IG and confidentiality.

- **Pilgrimage Administrator**

Pilgrimage administrator is responsible for collating all information received from pilgrims applying to join the pilgrimage to Lourdes, so that it is available for the SMO when required. It is also their responsibility, along with the Healthcare Team Lead, to ensure that all of the appropriate clinical data is stored effectively, and managed for the appropriate time in accordance with the Pilgrimage Archive Policy for each and every item of data captured.

The Association Executive are responsible for ensuring appropriate IG guidelines are followed within their area of responsibility.

- **Volunteer Co-ordinators & Helpers**

Group and Team Leaders (including, but not restricted to Hospitalité Focus Team, Music Group, Chaplaincy Team) have a responsibility, as guided by the Association Executive, to brief all those in their group regarding appropriate use and disclosure of information on the induction and preparation events prior to the pilgrimage, and by reinforcing this policy throughout the pilgrimage in Lourdes.

Volunteers, staff and pilgrims have a responsibility to be aware of and abide by the key aspects of this policy and to share any concerns with group leaders or Chaplaincy Team who in turn will share this with the Association Executive.

Information may be collected, used and retained for the purpose of the pilgrimage by key personnel, in order to meet the aims and objectives of the pilgrimage. The data will be kept and subsequently destroyed in line with the Archive Policy.

Practical Preparation

All volunteers and staff will undertake annual Practical Preparation prior to each pilgrimage.

Ensuring an Effective Information Governance Framework

There are several processes that the Association Executive employs, or is in the process of implementing, to ensure an effective and legal IG framework.

These are:

Data Quality: Ensuring that all information that is held about pilgrims and used to make decisions about them is as accurate as possible and triangulated with other sources to maintain that accuracy on an ongoing basis.

Privacy Impact Assessment: Ensuring that a Privacy Impact Assessment (PIA), essentially a Data Protection/IG risk assessment, is undertaken in line with guidance from the Information Commissioner's Office, when new and/or significantly enhanced processes and/or systems are introduced.

Information Asset Management: This takes two forms, first ensuring the Association Executive is aware of the Information Assets it holds (both paper and electronic), and basic information about them, such as who has access to the data, how that access is granted etc. This information is held in an Information Asset Register. Secondly, a process of Data Flow Mapping identifies and logs where data from these systems is sent to/received from. Both can assist in the assessment of Risks and/or support the recovery of information/assessment of damage if there is a breach.

Contracting arrangements: Maintaining a robust schedule of organisations with which the Pilgrimage shares PCD about pilgrims, volunteers and staff, and annually reviewing them to ensure that they have effective IG clauses included, specifically around appropriate management of PCD under the DPA and reporting back of incidents to the Pilgrimage Committee, should they occur.

Information Security: Ensuring a strict application of Information Security principles both in the Lourdes Office in the UK and while in Lourdes, to maintain the confidentiality, integrity and availability of pilgrim's, volunteer's and staff information.

Medical Records Retention and Destruction

Policy regarding retention and destruction of pilgrimage held Medical Records is based on our understanding of the principles of GDPR.

- Adult physical health records must be kept for eight years after their last interaction with the organisation.
- Paediatric physical health records must be kept until their 25th birthday or if the pilgrim was 17 at the conclusion of their interaction, until their 26th birthday.
- Mental health records must be kept for 20 years or 8 years after the pilgrim has passed away.

If there is a conflict in between the retention periods due to two or more of the above rules potentially applying, records are kept for the longest period.

Best practice suggests that it is advisable for a member of the Healthcare Team or suitably trained administrator to review any records prior to their destruction to prevent any inappropriate retention or destruction. Once the need for destruction is agreed, records must be destroyed under confidential conditions, such as using a cross-cutting shredder or an accredited confidential disposal company.

The Data Protection Officer, Senior Medical Officer or a trained administrator should retain a signed document confirming which documents were agreed for destruction.

This is to be undertaken en-masse on an annual basis shortly following each pilgrimage, in the latter part of the calendar year.

Glossary

DPO	Data Protection Officer
GDPR	General Data Protection Regulation
IG	Information Governance
LALPA	Liverpool Archdiocesan Lourdes Pilgrimage Association
PCD	Personal Confidential Data
PIA	Privacy Impact Assessment
SIRO	Senior Information Risk Owner
SMO	Senior Medical Officer