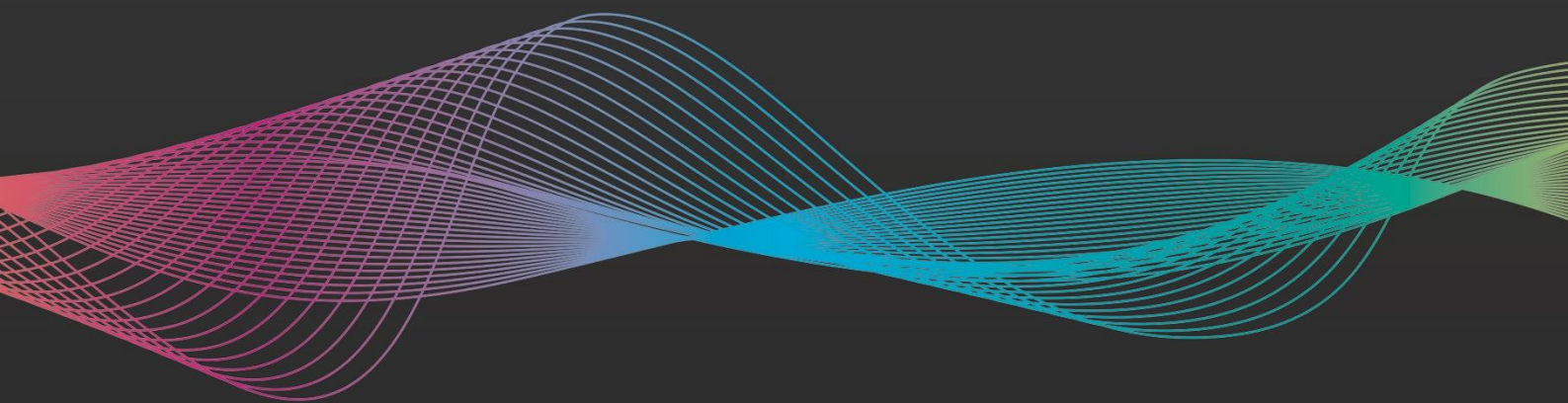


# Appropriate Policy Document for Processing Special Category Data and Criminal Offence Data for Safeguarding Purposes

November 2023



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## Consultation and Ratification Schedule

Document Name	Appropriate Policy Document for Processing Special Category Data and Criminal Offence Data for Safeguarding Purposes
Policy Number/Version:	0.2
Name of originator/author:	Midlands & Lancashire CSU Information Governance Team
Ratified by:	Quality & Patient Safety Committee
Name of responsible committee:	Quality & Patient Safety Committee
Date issued:	20/11/2023
Review date:	20/11/2024
Date of first issue:	20/11/2023
Target audience:	All staff, including temporary staff and contractors, working for or on behalf of NHS Cheshire & Merseyside ICB
Purpose:	To outline how the organisation will comply with UK GDPR and the Data Protection Act 2018 with regards to processing data (including criminal offence data) when undertaking its statutory duty to enable early intervention and preventative work for safeguarding and promoting welfare of those at risk of abuse and harm and for wider public protection. This applies to all areas of adult and children's safeguarding.
Action required:	All staff are required to ensure the organisation complies with this Appropriate Policy Document for Processing Data (Including Criminal Offence Data) for Safeguarding Purposes.
Cross Reference:	Code of Conduct Information Governance and Data Security Protection Policy Information Governance Handbook Each Place safeguarding ISA's which relate to this document which the organisation is part of ie a Multi-Agency Overarching Safeguarding ISA or a Domestic Homicide Review ISA

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Version	Date	Author	Changes
0.1	12/04/2021	IG Team	Draft version
0.2	18/07/2022	IG Team	Draft updated to reflect ICB

## Glossary of Terms

Term	Acronym	Definition
Anonymisation		It is the process of either encrypting or removing personally identifiable information from data sets, so that the people whom the data describe remain anonymous.

Term	Acronym	Definition
Child Death Review		Carried out by a Child Death Overview Panel for the purpose of a review or analysis to identify matters relating to the death or deaths that are relevant to the welfare of children in the area or to public health and safety, and to consider whether it would be appropriate for anyone to take action in relation to any matters identified.
Clinical Commissioning Group	CCG	They were responsible for commissioning healthcare services in both community and hospital settings up to the 30 <sup>th</sup> June 2022 when they were replaced by ICBs.
Commissioning Support Unit	CSU	A Commissioning Support Unit (CSU) is an Organisation. Commissioning Support Units provide Clinical Commissioning Groups with external support, specialist skills and knowledge to support them in their role as commissioners, for example by providing: Business intelligence services.
Code of Conduct		Policy document which sets out rules to guide behaviours and decisions in a specified situation.
Data Controller		The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Data Processor		A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
Data Protection Act 2018	DPA	An Act for the regulation of the processing of information relating to living individuals, including the obtaining, holding, use or disclosure of such information
Data Protection Impact Assessment	DPIA	A method of identifying and addressing privacy risks in compliance with GDPR requirements.
Data Protection Officer	DPO	A role with responsible for enabling compliance with data protection legislation and playing a key role in fostering a data protection culture and helps implement essential elements of data protection legislation

Term	Acronym	Definition
Data Security and Protection Toolkit	DSP Toolkit	The DSP Toolkit is the standard for cyber and data security for healthcare organisations. Organisations measure performance against the National Data Guardian's 10 data security standards.
Data Subject		The identified or identifiable living individual to whom personal data relates
Domestic Homicide Review	DHR	“Domestic Homicide Review” (“DHR”) is a multi-agency review of the circumstances in which the death of a person aged 16 or over has, or appears to have, resulted from violence, abuse or neglect by a person to whom they were related or with whom they were, or had been, in an intimate personal relationship, or a member of the same household as themselves. A DHR is run by a “Community Safety Partnerships” (“CSP”) which is made up of representatives from the Police, Local Authorities, and Health &c (who are “Responsible Authorities”).
UK General Data Protection Regulation	UK GDPR	<p>The UK GDPR is the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (EU GDPR) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419).</p> <p>The General Data Protection Regulation (EU GDPR) is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA). It also addresses the transfer of personal data outside the EU and EEA areas. It replaced the Data Protection Directive 95/46/ect.</p>

Term	Acronym	Definition
Information Asset Register		A register that records assets, systems and applications used for processing or storing personal data across the organisation
Integrated Care Boards	ICB	They replaced CCGs from the 1 <sup>st</sup> July 2022 and they are responsible for commissioning healthcare services in both community and hospital settings.
Information Commissioner's Office	ICO	The Information Commissioner's Office (ICO) upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals.
Information Governance Handbook		Policy document outlining the standards and expectation of staffs' compliance and expected code of conduct.
Information Governance and Data Security Protection Policy		An overview of the organisation's approach to information governance and includes data protection and other related information governance policies; and details about the roles and management responsible for data security and protection in the organisation.
Information Sharing Agreement	ISA	An Agreement outlining the information that parties agree to share and the terms under which the sharing will take place.
Pseudonymisation		The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
Personal Data		Any information by which a living individual (the "Data Subject") can be identified. Individual identification can be by information alone or in conjunction with other information.
Privacy Notice		A public facing document which informs the data subject of how they should expect their personal information to be processed.

Term	Acronym	Definition
Record Management Code of Practice 2016		<p>A guide to use in relation to the practice of managing records relevant to organisations working within, or under contract to, the NHS in England. This includes Public Health functions in local authorities and Adult Social Care where joint care is provided with the NHS.</p> <p>It provides a framework for consistent and effective records management based on established standards</p>
Retention Schedules		<p>A policy document that identifies and describes an organisation's records, usually at the series level, and provides instructions for the disposition of the records throughout their life cycle</p>
Safeguarding Adults Boards	SAB	<p>A group of partners whose responsibility is to help and safeguard adults with care and support needs by assuring itself that local safeguarding arrangements are in place as defined by the Care Act 2014 and statutory guidance.</p>
Safeguarding Purposes		<p>Processing data under a statutory duty to enable early intervention and preventative work for safeguarding and promoting welfare of those at risk of abuse and harm and for wider public protection, for all areas of adult and children's safeguarding</p>



## Introduction

This policy, established by the Cheshire & Merseyside ICB explains how the Cheshire & Merseyside ICB's, acting in their capacity as a Data Controller and/or through their Data Processors will

- ensure compliance with the Data Protection Principles; and
- manage the retention and erasure of Personal Data,

to comply with the following requirements of the Data Protection Legislation, including but not limited to the Data Protection Act 2018:

- Section 38 (Schedule 1) of the Data Protection Act 2018 which requires an Appropriate Policy Document where Data is Processed in reliance on a condition in Part 1, 2 or 3 of Schedule 1 of the Data Protection Act 2018 to provide a lawful basis,
- reliance under Section 18 and Section 19 of Schedule 1 of the Data Protection Act 2018 to provide a lawful basis under Article 9(2)(i) of the General Data Protection Regulations, in that processing data for safeguarding purposes is necessary for reasons of substantial public interest,
- reliance under Section 6 (Schedule 1) of the Data Protection Act 2018 to provide a lawful basis under Article 10 of General Data Protection Regulations, in that it is necessary for a function conferred by an enactment or rule of law (Section 9 of the Domestic Violence, Crimes and Victims Act 2004) and is necessary for reasons of substantial public interest,

so that the Cheshire & Merseyside ICB can process Special Category Data and Criminal Offence Data when undertaking its statutory duty to enable early intervention and preventative work for safeguarding and promoting welfare of those at risk of abuse and harm and for wider public protection, for all areas of adult and children's safeguarding.

## The Data Protection Principles

The Data Protection Principles require Personal Data to be:

1. Processed lawfully and fairly (**Lawfulness and Fairness**). In addition, the processing of Personal Data must be undertaken transparently (**Transparency**);
2. Collected for specified, explicit and legitimate purposes, and not further processed in a way which is incompatible with those purposes (**Purpose Limitation**);
3. Adequate, relevant and not excessive in relation to the purposes for which it is processing (**Data Minimisation**);
4. Accurate and where necessary kept up to date (**Accuracy**);
5. Kept for no longer than is necessary for the purposes for which it is processed (**Storage Limitation**); and

6. Processed in a way that ensures appropriate security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (*Integrity and Confidentiality*).

## The Conditions for the Processing of Special Category Data and Criminal Offence Data for Safeguarding Purposes for reasons of Substantial Public Interest

### Child Safeguarding Practice Reviews

The processing of Personal Data by the ICB is lawful because:

- it is a partner of the local multi-agency safeguarding partnership within Cheshire & Merseyside as set out in the Children Act 2004, as amended by the Children and Social Work Act 2017 and the purpose of such reviews is to explore how practice can be improved through changes to the system itself and seek to understand why mistakes were made and to comprehend whether mistakes made on one case frequently happen elsewhere and why; and
- it may request information from a person or organisation for the purposes of enabling or assisting the review and/or analysis process under Section 10,11 & 16D of the Children Act 2004; and
- under Section 18 of Schedule 1 of the Data Protection Act 2018, for the reasons of substantial public interest it is necessary to process the data for the purposes of protecting an individual (including a type of individual) from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual where that individual is aged under 18 where that processing is carried out without the consent of the data subject where consent cannot be given, or the data controller cannot reasonably be expected to obtain the consent of the data subject or obtaining consent would prejudice the provision of protection,

and so in accordance with Section 8 and 10 of the DPA the ICB meets the requirement under Article 6(1)(e) of the UK GDPR to process Personal Data, and Article 9(i) of UK GDPR to process Special Category Data for reasons of substantial public interest.

### Rapid Review

The processing of Personal Data by the ICB is lawful because:

- it is a partner of the local multi-agency safeguarding partnership within Cheshire & Merseyside as set out in the Children Act 2004, as amended by the Children and Social Work Act 2017 and under Chapter 4 of the statutory guidance *Working Together to Safeguard Children 2018* are required to undertake a rapid review for serious child safeguarding purposes where abuse or neglect of a child is suspected and the child has died or has been seriously harmed; and
- the purpose of such reviews is to gather the facts about the case, as far as they can be readily established

at the time, discuss whether there is any immediate action needed to ensure children's safety and share any learning appropriately, consider the potential for identifying improvements to safeguard and promote the welfare of children, decide what the appropriate course of action is; and

- it may request information from a person or organisation for the purposes of enabling or assisting the review and/or analysis process under Section 10,11 & 16D of the Children Act 2004; and
- under Section 18 of Schedule 1 of the Data Protection Act 2018, for the reasons of substantial public interest it is necessary to process the data for the purposes of protecting an individual (including a type of individual) from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual where that individual is aged under 18 where that processing is carried out without the consent of the data subject where consent cannot be given, or the data controller cannot reasonably be expected to obtain the consent of the data subject or obtaining consent would prejudice the provision of protection,

and so in accordance with Section 8 and 10 of the DPA the ICB meets the requirement under Article 6(1)(e) of the UK GDPR to process Personal Data, and Article 9(i) of UK GDPR to process Special Category Data for reasons of substantial public interest.

## Child Death Review

The processing of Personal Data by the ICB is lawful because:

- it is a partner of the Child Death Overview Panels within Cheshire & Merseyside as set out in the Children Act 2004, as amended by the Children and Social Work Act 2017 and the purposes of a review or analysis are to identify matters relating to the death or deaths that are relevant to the welfare of children in the area or to public health and safety, and to consider whether it would be appropriate for anyone to take action in relation to any matters identified; and
- it may request information from a person or organisation for the purposes of enabling or assisting the review and/or analysis process under Section 10 & 11 of the Children Act 2004; and
- under Section 18 of Schedule 1 of the Data Protection Act 2018, for the reasons of substantial public interest it is necessary to process the data for the purposes of protecting an individual (including a type of individual) from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual where that individual is aged under 18 where that processing is carried out without the consent of the data subject where consent cannot be given, or the data controller cannot reasonably be expected to obtain the consent of the data subject or obtaining consent would prejudice the provision of protection,

and so in accordance with Section 8 and 10 of the DPA the ICB meets the requirement under Article 6(1)(e) of the UK GDPR to process Personal Data, and Article 9(i) of UK GDPR to process Special Category Data for reasons of substantial public interest.

## Safeguarding Adults Boards

The processing of Personal Data by the ICB is lawful because:

- under Section 18 and 19 of Schedule 1 of the Data Protection Act 2018, for the reasons of substantial public interest it is necessary to process the data for the purposes of protecting:
  - an individual (including types of individual from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual where that individual is aged over 18 and at risk where there is a reasonable cause to suspect that the individual has needs for care and support, is experiencing, or at the risk of neglect or physical, mental or emotional harm and as a result of those needs is unable to protect themselves against the neglect or harm or the risk of it; or
  - the economic well-being of an individual at economic risk who is aged 18 or over and the data is concerning health,

where that processing is carried out without the consent of the data subject where consent cannot be given, or the data controller cannot reasonably be expected to obtain the consent of the data subject or obtaining consent would prejudice the provision of protection; and

- may request or provide information to enable the Safeguarding Adults Board to exercise its functions;
- processing is a statutory responsibility under the above-mentioned legislation because the ICB is a member of the Safeguarding Adults Boards under Schedule 2 of the Care Act 2014 and so has a duty to help and safeguard adults with care and support needs by assuring itself that local safeguarding arrangements are in place as defined by the Care Act 2014,

and therefore in accordance with Section 8 and 10 of the DPA the ICB meets the requirement under Article 6(1)(e) of the UK GDPR to process Personal Data, and Article 9(i) of UK GDPR to process Special Category Data for reasons of substantial public interest.

## Domestic Homicide Review

The processing of Personal Data by the ICB is lawful because it is:

- a relevant authority under the Crime & Disorder Act 1998 (as updated by the Health and Social Care Act 2012) and so has a statutory responsibility to work in partnership with other responsible authorities (police, council, fire and probation &c) to form Community Safety Partnerships (CSPs) to tackle crime, disorder, drugs and alcohol; and
- there is a statutory responsibility for CSPs to share relevant information in order to complete a Domestic Homicide Review (DHR) under Section 9 of the Domestic Violence, Crime and Victims Act (2004) when a case meets the criteria set out in Section 9(1) of said Act; and
- Processing is necessary under the above-mentioned legislation and so there is a reason to process the data under a substantial public interest under Section 6 (Part 2) of Schedule 1, and Section 36 (Part 3) of Schedule 1 of the Data Protection Act 2018,

and therefore the ICB in accordance with Section 10 of the DPA meets the requirement under Article 10 of GDPR to process Personal Data relating to criminal convictions and offences.

## Conditions for Processing

Under Section 38 (Part 4) of the DPA the ICB is required to have in place an Appropriate Policy Document in place when the Processing is carried out and:

- this document explains the ICB s procedures for securing compliance with the principles in Article 5 of GDPR in connection with the processing of personal data in reliance on the above conditions; and
- explains the ICB s policies as regards the retention and erasure of personal data processed in reliance on the above conditions, giving an indication of how long such personal data is likely to be retained; and
- explains that the processing is necessary to fulfil obligations or exercise rights in law in connection with special category of personal data (including Safeguarding Data) and Criminal Offence Data,

and that the above will be met by this Appropriate Policy Document.

## How the ICB will meet the Data Protection Principles

### Lawful and Fair

The ICB s will communicate processing information to Data Subjects via the Privacy Notice on the ICB website. It will also make the same information available in other formats to Data Subjects on the collection of Personal Data from the Data Subject and/or on request, as appropriate.

The ICB will only undertake Processing of Personal Data where it has a lawful basis to do so and where the information is required for a specific reason.

### Specified, Explicit and Legitimate Purposes

Processing of Personal Data will be restricted to only that which is necessary meet its statutory duty to enable early intervention and preventative work for safeguarding and promoting welfare of those at risk of abuse and harm and for wider public protection, for all areas of adult and children's safeguarding.

Criminal Offence Data will be processed to conduct a Domestic Homicide Review and it will not be used for a matter which is not for that purpose unless that use is authorised by law. It may, be used for another lawful purpose by the ICB or another organisation that is authorised to carry out the processing of Criminal Offence Data.

### Adequate, Relevant and not Excessive

Any Personal Data collected for Safeguarding Purposes or for the conduct of a Domestic Homicide Review will be restricted to that which is necessary for the purposes of processing. Data will be subject to anonymisation, and where required, pseudonymisation. The data protection training undergone by all staff emphasise is this. Staff are also advised not to record their opinions unless that is a requirement.

### Accurate and where necessary kept up to date

The ICB will ensure, as far as reasonably possible, that the Personal Data which the ICB holds is accurate and kept up to date. In some circumstances there may be a need to keep a factually incorrect information e.g. in a statement from a victim, witness or alleged perpetrator.

All staff are made aware of the need for accuracy and are responsible for the accuracy of the Personal Data they process. Checks are carried out on the accuracy of Personal Data during audits and reviews.

Personal Data found to be inaccurate will be rectified or destroyed whenever possible. Where this is not possible, there will be an addendum on that Personal Data advising of the inaccuracy.

### **Kept for no longer than is necessary**

The ICB will comply with the Records Management Code of Practice for Health and Social Care 2016 regarding the retention of Personal Data. From this the ICB has created their own local retention schedule.

All personal data kept for specific purposes is reviewed on a regular basis and will not be processed for longer than is necessary.

When an individual withdraws consent to the Processing (where consent has been previously requested and provided by the individual), that the Personal Data will be destroyed in line with the legislative requirements, if the ICB has no other lawful basis to continue Processing such Personal Data.

### **Appropriate Security**

The ICB has developed and implemented appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

### **Technical Measures**

The ICB complies with the information security standards set by NHS Digital. The ICB publishes its Data Security Protection Toolkit on an annual basis which demonstrates compliance with those security standards. In addition, the Data Processor to the ICB, MLCSU, Informatics Merseyside and Mid Mersey Digital Alliance, implement technical measures which include encryption, firewalls, antivirus software, IT health checks, vulnerability assessment and penetration process, user authentication, role based and password-controlled access, technical assurance and technical audits and endpoint management.

### **Organisation Measures**

All new staff are vetted prior appointment and must be required to undertake mandatory data protection training on an annual basis.

Buildings are kept physically secure, with access only being granted to individuals who require it.

Further measures are out in the following policies:

- Information Governance and Data Security and Protection Policy
- Information Governance Handbook
- Information Governance Code of Conduct
- Retention schedules

### **Retention and Erasure of Personal Data**

Destruction of Personal Data will be dealt with in accordance with the ICB's retention schedule and/or in accordance with the guidance provided by the Secretary of State.

Where Data is processed for Safeguarding Purposes (including Criminal Offence Data), where a review or a panel

is involved reports may be published. Such Published reports will not contain personal data. Each C&M Place Partnerships and Boards have their own process and timeframe for publication and archiving of the reports including the timeframe they will stay on each individual Partnership and Board website and how long after they will then archive.

## Accountability

The ICB will demonstrate compliance with the data protection principles by:

- ensuring that records are maintained of all Personal Data processing activities and that such records are provided to the Information Commissioner's Office (ICO) on request; and
- carrying out a data protection impact assessment on any high-risk Personal Data processing and consulting the ICO if appropriate; and
- appointing a Data Protection Officer (DPO) to provide independent advice and monitoring of Personal Data handling; and
- having in place internal processes to ensure that Personal Data is only collected, used or handled in a way that is compliant with the data protection law.

## Retention and Review of this Policy

This policy document will be retained in accordance with Section 40 (Schedule 1) of the DPA. It will be made available to the ICO on request. This policy document will be recorded on the ICB s information asset register.

The policy will be reviewed on an annual basis (or more regularly if circumstances require it).

## Further Information

For further information about how the ICB is compliant with the data protection law, or if you wish to contact the Data Protection Officer, you may do so by:

- **Accessing the ICB s Privacy Notice**  
<https://www.cheshireandmerseyside.nhs.uk/about/how-we-work/privacy-notice/>
- **Contacting the ICB:**
  - Regatta Place, Brunswick Business Park, Liverpool, L3 4BL  
enquiries@cheshireandmerseyside.nhs.uk
- **Contacting the DPO:**
  - Hayley Gidman  
Head of Information Governance  
Midlands and Lancashire CSU,  
Heron House, 120 Grove Road,  
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