



# DATA PROTECTION POLICY

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## Introduction

The Arundel and Brighton Lourdes Pilgrimage policies reflect the specific activities of the pilgrimage in pre-planning and in Lourdes and therefore should be read in conjunction with the overarching policies of the Diocese of Arundel and Brighton where applicable.

The Arundel & Brighton Diocesan Lourdes Pilgrimage will ensure that all Personal Confidential Data (PCD) and sensitive information obtained about its pilgrims is effectively managed and that appropriate policies, procedures, management accountability and structures provide a robust Information Governance (IG) framework.

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 pilgrim including helpers and clinical staff, not solely those travelling as Assisted Pilgrims.

## Scope

This policy guides the use of PCD 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 the pilgrimage activities to store (electronically or physically), process and transmit information.

Technology moves quickly. To this end, the spirit of this policy applies to any emergent technology that will be used to support future pilgrimage administration.

Healthcare IG is in a state of considerable flux with regard to guidance and legislation. Most significant is the GDPR which will, Brexit notwithstanding, apply to the UK. Future updates of the policy will be amended to take changes as a result of the GDPR and other initiatives into account.

## Responsibilities

The **Pilgrimage Director** has overall day-to-day responsibility for all aspects of the Pilgrimage's activities, and reports to the Diocesan Board of Trustees

The Pilgrimage Director incorporates the role of Senior Information Risk Owner (SIRO). In practical terms they are accountable for, and report to the Diocesan Trustees 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 **Chief Medical Officer (CMO)** takes responsibility for all clinical decisions made prior to and during the Pilgrimage to Lourdes.

The CMO is supported by the **Chief Nurse**, and together they co-ordinate all medical support for the pilgrimage and a substantial team of clinicians, 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 Administration Staff** are responsible for collating all information received from pilgrims applying to join the pilgrimage to Lourdes, so that it is available for the CMO and the Chief Nurse when required. It is also their responsibility to ensure that all of the appropriate clinical data is stored effectively, and managed for the appropriate time in accordance with the Pilgrimage's archive schedule for each and every item of data captured.

The **Pilgrimage Core Team** are responsible for ensuring appropriate IG guidelines are followed within their area of responsibility.

**Volunteer Group Leaders and Co-ordinators** have a responsibility, as guided by the Pilgrimage, to brief all Helpers in their group regarding appropriate use and disclosure of PCD on the pilgrimage Briefing Day and by reinforcing this policy throughout the pilgrimage in Lourdes.

**Volunteer Group Helpers (Hospitalité)** have a responsibility to be aware of and abide by the key aspects of this policy and to share any concerns with their Group Leader.

## Training and Awareness

All staff and volunteers will receive an update briefing on best practice at the annual pilgrimage Briefing Day. All Pilgrimage staff and the Core Team should receive IG training on an annual basis.

## Related Policy

The Diocese of Arundel & Brighton Data Protection Policy