



**The Clatterbridge
Cancer Centre**
NHS Foundation Trust

Clatterbridge Road
Bebington
Wirral
CH63 4JY

Tel: 0151 556 5000
Web: www.clatterbridgecc.nhs.uk

Date: 17 December 2018

Re: Freedom of Information Request
Ref: 247-2018

Thank you for your email dated 19th November 2018 requesting information regarding “shadow IT” or “feral” systems storing patient identifiable data.

The information that you require is as follows:

- **Does your Trust have a policy relating to shadow IT and feral systems. If yes, can you provide a copy of that policy?**

No.

The Clatterbridge Cancer Centre NHS Foundation Trust closely follows the best practice cyber and data security example policies set out by NHS Digital. The Clatterbridge Cancer Centre will contact NHS Digital for their advice and input in this matter.

- **Has your Trust carried out a recent audit of shadow IT and feral systems?**

No.

The Trust has not carried out a 2018/2019 audit specifically of shadow IT and feral systems. The Trust conducts audits of its Data Flows, Records Management and Information Assets and will be conducting these for 2018/2019. These audits will identify current shadow IT and feral systems.

- **If Yes, can we have a copy of that audit? If No, will you provide an estimate of the number of such systems in your Trust?**

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- If you are unable to identify ALL shadow IT and feral systems, will you explain how you intend to meet your obligations under GDPR?

All Trust Information Assets are managed under the Trust's Information Asset Policy. In line with this policy and as outlined within GDPR, the Trust adopts a risk based approach to compliance, taking into account the nature, scope, context and purposes of processing as well as the risk of likelihood and severity for the rights and freedoms of the data subjects. The Trust implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

Furthermore, the Trust's Infrastructure based Information Assets such as Network, Network Storage, Virtualisation and Firewalls, on which all Trust application and system based Information Assets (including shadow IT and feral systems) have dependencies upon, provide an appropriate level of security appropriate to the risk.

- Do you have a picture of how many feral systems adhere to NHS national data standards?

No, see answer to question "*Has your Trust carried out a recent audit of shadow IT and feral systems?*"

- Are shadow systems currently covered under your trust's Cyber Security policies and IG Toolkit?

Currently, shadow systems are not specifically referenced in the Trust's Information Governance, Information Security and Cyber Security related policies, however this will be considered during the annual review cycle of all such aforementioned policies.

Shadow systems are not specifically referenced in the current version of the Data Security & Protection Toolkit.

Should you require any further information please do not hesitate to contact me on the email address provided below.

Please remember to quote the reference number above in any future communications.

If you are dissatisfied with the handling of your request, you have the right to ask for this to be investigated internally.

If you are dissatisfied with the information you have received, you have the right to ask for an internal review.

Both processes will be handled in accordance with our Trust's Freedom of Information Policy and the Freedom of Information Act 2000.

Internal investigation and internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to: Freedom of Information Review, The Clatterbridge Cancer Centre NHS Foundation Trust, Clatterbridge Road, Bebington, Wirral, CH63 4JY

If you are not satisfied with the outcome of the internal investigation/review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

In order for us to ensure customer satisfaction and to monitor compliance with the Freedom of Information Act 2000, we would be grateful if you could take a couple of minutes to complete a short feedback form via the link below:

<https://www.surveymonkey.co.uk/r/H39RFMM>