

Camilla Bhondoo
Head of Risk Assurance and Data
Protection Officer
Jubilee Court, Academy Site,
Waterside,
St Helens,
WA9 1T
www.MerseyWestLancs.nhs.uk

Dear Andrew,

Thank you for your request for an internal review of the response to your FOI ref: 2002. I am sorry you were not satisfied with the initial response,

In accordance with the Trust's Freedom of Information procedure, an internal review was conducted by Laura McCoy – Information Governance Lead and Eric Phipps Assistant Director of Informatics on 11/09/2025; please find below the outcome. I have included your request and response for reference:

Request

Access to Testing Clinical Information Systems

What is the approval process by which an external organisation may apply or request to connect with the trust's **test clinical systems of record**. (e.g. EMR, EHR, PACS)

- 1) Which internal teams, roles, or committees are responsible for approving such a connection?
- 2) What steps are involved in obtaining the necessary permissions or agreements to establish such a connection?
- 3) What is the entry point for this process? e.g. email address or webform.

Access to Production Clinical Information Systems

- 4) What is the approval process by which an external organisation may apply or request to connect with the trust's **production clinical systems of record**. (e.g. EMR, EHR, PACS)
- 5) Which internal teams, roles, or committees are responsible for approving such a connection?
- 6) What steps are involved in obtaining the necessary permissions or agreements to establish such a connection?
- 7) What is the entry point for this process? e.g. email address or webform.

Clarity on the abbreviations below.

- **API** – Application Programming Interface
- **EHR** – Electronic Health Record
- **EMR** – Electronic Medical Record
- **FHIR** – Fast Healthcare Interoperability Resources
- **GP** – General Practitioner
- **PACS** – Picture Archiving and Communication System **SME** – Small and Medium-sized Enterprise

Response

Thank you for your request regarding access to the Trust's clinical information systems, including both test and production environments (e.g. EMR, EHR, PACS). While we understand the importance of transparency and collaboration, the Trust must also prioritise the security and integrity of its systems and the protection of patient data.

In accordance with the Freedom of Information Act 2000, the Trust is applying an exemption under Section 31(1)(a) – Law Enforcement, which states:

“Information is exempt if its disclosure would, or would be likely to, prejudice the prevention or detection of crime.”

This exemption is supported by guidance from the Information Commissioner's Office, which clarifies that Section 31(1)(a) applies not only to law enforcement bodies but also to any public authority where disclosure could increase vulnerability to crime. In this case, releasing details about how external organisations may request access to clinical systems, whether test or live, would expose the Trust's internal security procedures and potentially highlight areas of vulnerability.

It is important to note that information disclosed under the Freedom of Information Act becomes publicly available. Therefore, MWL must consider the impact of general release, not just disclosure to the individual requester. Revealing the approval process, responsible teams, and entry points for system access could enable malicious actors to exploit or target the Trust's infrastructure.

As such, the Trust has determined that disclosing whether external organisations can access clinical systems, and the process by which this might occur, would likely prejudice the security of those systems. This includes both test environments, which often mirror production systems, and live clinical systems that contain sensitive patient data.

Consequently, the Trust is applying Section 31(1)(a) to withhold this information. This decision reflects our commitment to safeguarding patient information, maintaining system integrity, and complying with national data protection and cybersecurity standards.

Internal Review

The Trust applied Sec 31 exemption explaining how release of the information would likely prejudice the security of Trust Systems. ,however on review of the questions asked the response by the Trust is incorrect, and should have been that there are no processes in existence whereby a supplier can apply for approval to access the Trusts testing or production environments of the Clinical Information systems.

Access to Trust systems is initiated and managed directly by the Trust and its contracted suppliers.

If you remain dissatisfied, your next step is to lodge a complaint with the Information Commissioner's Office. You can lodge a complaint and find further Information about your rights from the Information Commissioner at:

Information Commissioner's Office

Address: Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF
Telephone: 01625 545 700

Website: www.ico.org.uk



**Mersey and West Lancashire
Teaching Hospitals**
NHS Trust

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Camilla Bhondoo'.

Camilla Bhondoo
Head of Risk Assurance and Data Protection Officer
Jubilee Court, Academy Site, Waterside, St Helens, WA9 1TT