



Treasury Management Policy

**Guidance on how to manage the
Trust's treasury requirements**

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1.0 Quick Look Summary

In order to maintain good corporate governance it is critical for the Trust to have a formally approved Treasury Management policy and to document and formalise how the Trust manages its treasury function.

This policy aims to provide guidance on how to manage the Trust's treasury requirements. This includes setting targets for the minimum level of cash, maximum debt, investments and how each area should be monitored and reported.

The policy provides details on:

- The overall treasury management objectives
- The number of high-level controls that are in place to manage risk and control, including the Trust's attitude to identified key risks
- Details on cashflow forecasting, investments, short term borrowing, the funding of capital investments, and purchasing cards
- Delegated powers
- Reporting
- Organisational responsibilities

This policy is reviewed by the Audit & Risk Committee for adequacy, and then formally approved by the Trust Board. It will be subject to review by the Audit & Risk Committee, every three years.

1.1 Version Control and Summary of Changes

Version number	Date	Comments
1.0	July 2010	Approved
1.1	May 2011	Revised
1.2	March 2012	Revised and Reviewed
1.3	February 2013	Reviewed
1.4	February 2014	Revised and Reviewed
1.5	February 2015	Revised and Reviewed
1.6	February 2016	Revised and Reviewed
1.7	February 2017	Revised and Reviewed
1.8	February 2018	Revised and Reviewed
1.9	February 2019	Revised and Reviewed
2.0	February 2020	Revised and Reviewed
2.1	September 2020	Revised and Reviewed (review date changed to realign with refreshed FPC work plan)
2.2	December 2021	Revised and Reviewed (exceeded 12 months due to change in committee responsibility, now A&AC)
2.3	December 2022	Revised and Reviewed (summary of changes at Appendix 6)
3.0	July 2023	Revised (for formatting)
4.0	December 2023	Reviewed

1.2 Key individuals involved in developing and consulting on the document

Name	Designation
Accountable Director - Sharon Murphy	Director of Finance & Performance
Author – Jackie Moore	Financial Controller
Implementation Lead – Matt White	Deputy Director of Finance & Procurement
Core policy reviewer group	Finance
Wider consultation	NHS England
Trust Policy Group	

1.3 Governance

Level 2 or 3 approving delivery group	Level 1 Committee to ratify policy
Audit & Risk Committee	Trust Board

1.4 Equality Statement

Leicestershire Partnership NHS Trust (LPT) aims to design and implement policy documents that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. It takes into account the provisions of the Equality Act 2010 and promotes equal opportunities for all. This document has been assessed to ensure that no one receives less favourable treatment on the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity.

1.5 Due Regard

LPT will ensure that Due regard for equality is taken and as such will undertake an analysis of equality (assessment of impact) on existing and new policies in line with the Equality Act 2010. This process will help to ensure that:

- Strategies, policies and procedures and services are free from discrimination.
- LPT complies with current equality legislation.
- Due regard is given to equality in decision making and subsequent processes.
- Opportunities for promoting equality are identified.

Please refer to due regard assessment (Appendix 4) of this policy

1.6 Definitions that apply to this Policy

Borrowing	To take money from a financial institution and pay it back over a period of time.
Debt	A person or organisation that owes money, or an amount that is owed.
Deposit	Money held in a bank account or with another financial institution that requires a transfer from one party to another.
Investments	The action or process of investing money for profit.
Risk	Financial risk refers to the likelihood of losing money on a business or investment decision. Risks associated with finances can result in capital losses. There are several financial risks, such as credit, liquidity, and operational risks.
Treasury Management	Treasury management includes the management of a business's holdings, with the ultimate goal of managing the firm's liquidity and mitigating its operational-, financial- and reputational risk. Treasury Management includes a firm's collections, disbursements, concentration, investment and funding activities.

2.0 Purpose and Introduction

This policy aims to provide guidance on how to manage the Trust's treasury requirements. This includes setting targets for the minimum level of cash, maximum debt, investments and how each area should be monitored and reported.

3.0 Policy requirements

4.0 Treasury Management policy details

Treasury Management is concerned with the process of managing all cash transactions relating to the funding of revenue and capital investment operations of the Trust. There must be effective processes and procedures in place to ensure that all of the Trust's financial obligations (e.g. the payment of employees and suppliers) can be met without interruption.

4.1. Policy statement and objectives

The overall treasury management objectives are to support the Trust's development by:

- a) ensuring that cash is managed within the Trust effectively, and all financial obligations can be met on the day they fall due.
- b) ensuring that approved institutions are used for the investment of surplus funds.
- c) ensuring that any borrowing requirements are managed in accordance with predetermined guidelines.
- d) ensuring that the Trust Board is kept fully aware of the Trust's ongoing cash position by regular and thorough reporting.
- e) ensuring that all transactions and reviews are carried out within the appropriate timeframe and by the appropriate person.
- f) ensuring that procedures are in place for dealing with brokers, banks, and any other external party to the Trust's Treasury management operation, and
- g) Ensuring ongoing scrutiny of contractors' finances. Following the collapse of Carillion, lessons learnt stipulates financial vetting should take place during the delivery of the contract, not just during the tendering process.

4.2. Risk and Control

The main liquidity imperatives are that the Trust must be able to meet all liabilities as they fall due and avoid the need to borrow if at all possible to meet short-term cash requirements.

To ensure that the Trust undertakes treasury activities in a controlled and properly reported manner, the following should be applied:

- The documentation of treasury management policies and processes within this document.
- Clearly defined roles and responsibilities for the Trust Board, the Director of Finance, the Treasury Management function and the rest of the Finance department.
- Regular reporting of treasury activities.
- Separation of duties between those who deal, those who initiate payment and those who account for treasury activities.
- Strict limits of the type of investment used and the circumstances in which they can be used; and

- Inclusion of treasury management activities within the scope of review by Internal and External Audit.

4.3. Attitude to Key Risks

Set out below is the Trust's attitude to key risks identified by the Trust and the key controls set up to mitigate those risks:

- **Funding** – the Trust will maintain adequate free funds to finance its day-to-day operations. The risk that the Trust fails to accurately identify a positive cash balance that is sufficient to pay creditors is managed by the use of cash flow forecasts and related monitoring systems. The Trust has its own internal target of keeping a cash balance of at least 11 days operating expenses.
- **Investments** – the Trust will only invest in safe harbour investments and anything outside of this will require the approval of the Trust Board. The risk that the Trust places surplus cash in an account attracting too high a risk is again managed by the use of an authorised list of deposit takers together with limits on the amount placed with each organisation. Long-term investments carry the risk that cash is not available to cover any unforeseen cash requirements therefore any investments should be time limited to a maximum of six months with any longer-term investments requiring the approval of the Finance and Performance Committee. The risk that the Treasury Function incurs excessive costs in placing an investment are mitigated by a minimum investment level that is sufficient to generate a return that covers costs; and
- **Foreign exchange management** - foreign exchange rate hedging will only be undertaken with the approval of the Trust Board who must be appraised of any implications for the Trust under the Compliance Framework. Any such hedging will only be approved if it is needed to mitigate the risk of making losses on any operational contracts.

Treasury activity for purely speculative reasons is strictly prohibited. The role of the treasury function is to maintain liquidity, mitigate and manage risk and to ensure a competitive return is received on the Trust's investments, within an acceptable risk profile, while also ensuring and promoting fiscal responsibility and prudent investments that do not compromise delivery of services. Investments can only be made with those institutions detailed in Appendix A.

The Trust will seek the advice of a professional financial advisor as required and when deemed appropriate.

The treasury function's role also includes the management and safeguarding of patients monies, ensuring a competitive return is received and that risk is managed and mitigated appropriately.

The Trust's insurance arrangements will be reviewed annually. To make a successful claim against commercial fraud, the Trust has to provide evidence that robust governance arrangements are in place and correct procedures have been applied.

5.0 Detailed Policy

5.1. Cash Flow forecasting

- 5.1.1. In order to ensure that adequate funds are available to pay forthcoming liabilities, and to identify any surpluses, cash flow forecasts will be maintained. Daily cash book reports will be prepared detailing the opening and closing cash position, providing a summary of the current cash receipts and payments (detailed daily cash flows will be maintained throughout the year). A rolling twelve-month cash flow projection will also be maintained to identify any investment opportunities or shortfall situations.

- 5.1.2. The Trust Board, through the Finance and Performance Committee will receive a rolling twelve-month cash flow report detailing the Trust's cash position, performance against plan, forecast year end position and any investment activities or borrowing requirements. A more detailed cash-flow statement will also be included in the Finance and Performance Committee's finance report.
- 5.1.3. All staff will support effective cash management in the Trust by ensuring that all invoices for payment receive prompt attention and are passed to the Payment Section to enable compliance with the Better Payment Practice Code, i.e. within 30 days from first receipt date of invoice into the Trust.
- 5.1.4. Staff with a responsibility for providing goods or services to external parties will ensure that debtor invoices are raised promptly; for the correct amounts; and sent to the most appropriate officers responsible for invoice authorisation and payment.

5.2. Investments

- 5.2.1. Details of investment instructions are described in the Trust's Standing Financial Instructions.
- 5.2.2. The security of the Trust's assets will be maintained at all times.
- 5.2.3. The liquidity of the Trust will be maintained and enhanced by ensuring that investing is only carried out with those institutions approved by the Trust Board (and included within Appendix A), and that returns from investments are maximised whilst exposure to market risk is minimised.
- 5.2.4. In line with the ethos of promoting patient care, all investments should be in line with sound ethical and environmental principles, and not opposed to the objectives and purpose of the Trust in the provision of healthcare.
- 5.2.5. Credit ratings of Trust approved investment organisations (see Appendix A) are to be reviewed on a regular basis, and at least once per year. Only those Rating Agencies recognised by NHS Improvement (NHSI) will be used (see Appendix A).
- 5.2.6. Surplus funds based on cash flow forecasting will be invested until required, at the best rate available to maximise the return from interest, and within a predetermined risk profile.
- 5.2.7. No investment shall be made without the appropriate written authorisation as follows:

Up to £1 million: Any two persons from the approved signatories list in Appendix B

£1 million and above: Any two persons from the approved signatories list in Appendix B, one of whom must be from Group A.

5.2.8. Types of Investment

Investments can be made with those institutions listed in Appendix A.

The following money market financial instruments may be used (all of which are low risk investments):

- a) Overnight - Money placed on deposit overnight and repaid automatically next day. The rate of interest will depend on the prevailing rate.
- b) Instant access accounts – Allows for quick and easy access. Provide banded rates, which means the greater the balance the more interest is earned.

- c) Fixed term deposits – Money is placed on the Money Market for a fixed period from overnight to 12 months. The funds may not be redeemed early or be moved.

Investments will only be made in safe harbour investments. These are investments that fulfil the following criteria: meet the permitted rating requirement issued by a recognised rating agency; are held at a permitted institution; have a defined maximum maturity date; are denominated in sterling, with any payments/repayments of interest/principal also in sterling; pay interest at a fixed, floating or discount rate; and are within the preferred concentration limit.

5.2.9. Deposit Limits

The maximum total deposit that can be made:

- Short term £20m for a period of one month
- Medium term £20m for a maximum period of 6 months
- With the exception of General Banking Service, investments shall not exceed £5m with any one institution.

Any investment proposal for a period exceeding one month will require approval by the Trust Board or by the Chief Executive and Director of Finance for ratification at the next Board meeting.

5.3. Short term borrowing

- 5.3.1. Details of borrowing instructions are described in the Trust's Standing Financial Instructions.
- 5.3.2. Short-term borrowing to meet a temporary cash-flow deficit must be funded from the authorised working capital facility only and in accordance with the Trust's financial procedures as required by The Trust's Standing Financial Instructions.
- 5.3.3. Specific authority of the Director of Finance is required where the facility is being used in circumstances where cash-flow forecasts do not demonstrate that the borrowing is repayable in less than one month.
- 5.3.4. All borrowing transactions to be authorised in writing by two signatories from Group A as set out in Appendix B. Any borrowings will be subject to approval from NHS England.
- 5.3.5. Revenue support will be available as Public Dividend Capital (PDC) from the Department of Health and Social Care for demonstrable short-term cash flow requirements and longer-term revenue support for providers in financial distress. This support will be provided as PDC which does not require principal repayment but carries a dividend payable at the current PDC rate.
- 5.3.6. All PDC cash drawdowns for short-term borrowings will be authorised as per the current bank mandate schedule.
- 5.3.7. All short-term working capital borrowing transactions to be entered on the Trust's Risk Register.

6.0 Funding of Capital Investment

Capital investment will be funded from various sources: from retained cash in excess of working capital requirements; cash generated from retained operating surpluses; from depreciation funding; and from external long-term borrowing.

The capital programme will be reviewed annually by the Capital Management Committee and Finance and Performance Committee, prior to approval at the Trust Board.

The Capital Management Committee and Finance and Performance Committee reviews of the annual programme will consider whether:

- a) The programme meets the objectives of the service development strategy and Business Plan
- b) Is affordable in revenue terms
- c) Achieves value for money
- d) Strategic capital schemes are supported by a full business case
- e) Is fundable from either retained cash or borrowings in accordance with NHSE&I guidance and within System capital allocation limits.

In respect of external borrowings, the appropriate lender will be determined by reference to the cash flow forecast and financial plans based on the rates and facilities available at the time.

The Trust will approve and maintain a list of sources from which Trust officers are authorised to borrow money.

No borrowing transaction shall be entered into without approval of the business case by the Trust Board.

For strategic schemes (> £3m), capital Project Bank Accounts (PBAs) will be set up to facilitate payments directly from the Trust to sub-contractors of P22 operators. This will mitigate any risk of non-payment to sub-contractors by large construction companies in the event of a financial collapse (as was the case with Carillion).

7.0 Trust Purchasing Cards

7.1. Cardholders must adhere to the requirements of the Purchasing Card Policy, including cardholder responsibilities, card safeguards and security.

7.2. All cardholders are required to authorise, code and return their card statements to Finance on a monthly basis. All receipts and order acknowledgements to be sent to the Procurement Team. Failure to return a statement or a reconciliation will result in the card being suspended.

7.3. Any temporary changes to credit limits, individual limits and barring of services will be administered by the Procurement Team and individually authorised by the budget holders and/or, dependent on value, named individuals on the bank mandate list. New cardholders will be approved by named individuals on the bank mandate list. A master list of issued cards, authorisation and credit limits is maintained and managed by the Procurement Team.

7.4. Any increase/decrease to the overall account credit limit will be approved by the Director of Finance.

8.0 Delegated Powers

The Director of Finance shall have overall control over treasury management. They will delegate authority within this policy to:

- a) Invest temporary surplus cash
- b) Borrow monies from approved sources to cover the Trust's cash requirements in line with NHSE&I guidance.
- c) Monitoring and report on the cash flow and liquidity position of the Trust.
- d) Move investments around to mitigate against real or potential risk

9.0 Reporting

On a weekly basis the Financial Accounting team will inform the Financial Controller of the balances on all accounts and investments.

The Director of Finance shall report to the Finance and Performance Committee and the Trust Board on the operations of the Treasury Management function. The report will include as a minimum:

- a) Actual against projected cash flows, with explanations for major variances i.e. major variances of 20% or greater from the plan and deficit cash flow projections
- b) Investment performance
- c) Details of any borrowing undertaken.

The Director of Finance shall bring to the attention of the Trust Board any exceptional matters at the earliest opportunity.

10.0 Organisation and Responsibilities

10.1. Responsibilities of the Finance and Performance Committee

The Finance and Performance Committee is a committee of the Trust Board, which meets on a bi-monthly basis. The role of the committee is to examine all exceptional financial issues, including investments, borrowings and capital expenditure. The Capital Management Committee will report into the Finance and Performance Committee on matters including capital planning and investments.

10.2. Responsibilities of the Audit & Assurance Committee

The Audit & Assurance Committee will review the Treasury Management policy at least annually.

10.3. Responsibilities of the Trust Board

The Trust Board has overall responsibilities for the financial activities at the Trust and approving the banking arrangements.

10.4. Responsibilities of the Chief Executive

The Chief Executive, as the accountable officer, is responsible and accountable for the funds entrusted to the Trust.

10.5. Responsibilities of the Director of Finance

- Overall management of the banking arrangements and for advising the Trust on the provision of banking services and operation of accounts. This also includes the management of the working capital facility.
- Overall responsibility for the Treasury management function at the Trust
- Opening of bank accounts

10.6. Responsibilities of the Financial Controller

- To produce the Treasury Management policy for approval by the Trust Board and to ensure that this is reviewed annually by the Audit & Assurance Committee.
- To manage the treasury management function of the Trust in line with the policy on a day-to-day basis.

10.7. Responsibilities of the Accounts Department

The Senior Finance Officer (Treasury Management) will obtain daily electronic bank statements and update the cash book and actual cash flow on a timely basis in an accurate manner. This will highlight cash balances and forecast cash balances. At the end of each month bank account reconciliation will be completed and signed by a senior member of Financial Accounts staff.

The Assistant Finance Manager (Technical) or nominated officer will initiate investments by reviewing the daily cash flow and taking into account known expenditure for the period of investment. The amount proposed to be invested is agreed with the Financial Controller. The investment is then approved in line with the guidance set out in this paper.

11.0 Procedures

The Financial Controller will ensure procedures are maintained for all of the Trust's treasury management functions, including working capital procedures.

12.0 Review

This policy is to be reviewed by the Audit & Risk Committee for adequacy, and then formally approved by the Trust Board. It will be subject to regular review by the Audit & Risk Committee, at least annually.

13.0 Training Needs

There is no training requirement identified within this policy

14.0 Monitoring Compliance and Effectiveness

Treasury Management performance is monitored both internally via the Finance and Performance Committee, and externally via the Trust's external auditors. In addition, the Trust's Internal Auditors review compliance and effectiveness of the policy as part of its cyclical Financial Systems Audit.

15.0 References and Bibliography

- Standing Financial Instructions – June 2023

16.0 Fraud, Bribery and Corruption consideration

The Trust has a zero-tolerance approach to fraud, bribery and corruption in all areas of our work and it is important that this is reflected through all policies and procedures to mitigate these risks.

- Fraud relates to a dishonest representation, failure to disclose information or abuse of position in order to make a gain or cause a loss. Bribery involves the giving or receiving of gifts or money in return for improper performance. Corruption relates to dishonest or fraudulent conduct by those in power.
- Any procedure incurring costs or fees or involving the procurement or provision of goods or service, may be susceptible to fraud, bribery, or corruption so provision should be made within the policy to safeguard against these.

APPENDIX 1

Permitted Institutions as outlined in Monitor's 'Managing Operating Cash in NHS Foundation Trust' paper *

- Institutions that have been granted permission or any European institution that has been granted a passport by the Financial Services Authority to do business with UK institutions provided it has an investment grade credit rating of A1/A+ issued by a recognised rating agency.
- The UK Government, or an executive agency of the UK Government, that is legally and constitutionally part of any department of the UK Government, including the UK Debt Management Agency Deposit Facility.

Recognised rating agencies:

- Standard & Poor's
- Moody's Investors Service Ltd
- Fitch Ratings

* Monitor was an executive non-departmental public body of the Department of Health, responsible between 2004 and 2016 for ensuring healthcare provision in NHS England was financially effective. Monitor was merged with the NHS Trust Development Authority to form NHS Improvement on 1 April 2016, which joined with NHS England to form NHS England and NHS Improvement (NHSE&I). This has subsequently become NHS England (NHSE) The Managing Operating Cash in NHS Foundation Trusts paper has not been superseded and is still in use.

APPENDIX 2

Approved Signatories for entering into borrowing transactions and making investments on behalf of the Trust

(To be read in conjunction with the Trusts Standing Financial Instructions and Standing Orders)

Group A

Chief Executive

Director of Finance

Deputy Director of Finance

Group B

Assistant Finance Manager

Divisional Heads of Finance

Financial Controller

Head of Corporate Finance

APPENDIX 3

The NHS Constitution

The NHS will provide a universal service for all based on clinical need, not ability to pay. The NHS will provide a comprehensive range of services.

Shape its services around the needs and preferences of individual patients, their families and their carers	<input type="checkbox"/>
Respond to different needs of different sectors of the population	<input type="checkbox"/>
Work continuously to improve quality services and to minimise errors	<input type="checkbox"/>
Support and value its staff	<input type="checkbox"/>
Work together with others to ensure a seamless service for patients	<input type="checkbox"/>
Help keep people healthy and work to reduce health inequalities	<input type="checkbox"/>
Respect the confidentiality of individual patients and provide open access to information about services, treatment and performance	<input type="checkbox"/>

APPENDIX 4

Due Regard Screening Template

Section 1			
Name of activity/proposal		Treasury Management Activities	
Date Screening commenced		30/11/2022	
Directorate / Service carrying out the assessment		Finance	
Name and role of person undertaking this Due Regard (Equality Analysis)		Jackie Moore, Financial Controller	
Give an overview of the aims, objectives and purpose of the proposal:			
AIMS: Guidance on cash management.			
OBJECTIVES: Maintain good corporate governance in all activities relating to cash management.			
Section 2			
Protected Characteristic	If the proposal/s have a positive or negative impact please give brief details		
Age			
Disability			
Gender reassignment			
Marriage & Civil Partnership			
Pregnancy & Maternity			
Race			
Religion and Belief			
Sex			
Sexual Orientation			
Other equality groups?			
Section 3			
Does this activity propose major changes in terms of scale or significance for LPT? For example, is there a clear indication that, although the proposal is minor it is likely to have a major affect for people from an equality group/s? Please <u>tick</u> appropriate box below.			
Yes		No <input checked="" type="checkbox"/>	
High risk: Complete a full EIA starting click here to proceed to Part B		Low risk: Go to Section 4.	
Section 4			
If this proposal is low risk please give evidence or justification for how you reached this decision:			
A due regard review found the activity outlined in the document to be equality neutral because it is procedural in nature, describing internal systems and processes.			
Signed by reviewer/assessor	Jackie Moore	Date	July 2023
<i>Sign off that this proposal is low risk and does not require a full Equality Analysis</i>			
Head of Service Signed	Matt White	Date	July 2023

APPENDIX 5

Data Privacy Impact Assessment Screening

<p>Data Privacy impact assessment (DPIAs) are a tool which can help organisations identify the most effective way to comply with their data protection obligations and meet Individual's expectations of privacy.</p> <p>The following screening questions will help the Trust determine if there are any privacy issues associated with the implementation of the Policy. Answering 'yes' to any of these questions is an indication that a DPIA may be a useful exercise. An explanation for the answers will assist with the determination as to whether a full DPIA is required which will require senior management support, at this stage the Head of Data Privacy must be involved.</p>		
Name of Document:	Treasury Management Policy	
Completed by:	Jackie Moore	
Job title	Financial Controller	Date July 2023
Screening Questions	Yes / No	Explanatory Note
1. Will the process described in the document involve the collection of new information about individuals? This is information in excess of what is required to carry out the process described within the document.	No	
2. Will the process described in the document compel individuals to provide information about them? This is information in excess of what is required to carry out the process described within the document.	No	
3. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information as part of the process described in this document?	No	
4. Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No	
5. Does the process outlined in this document involve the use of new technology which might be perceived as being privacy intrusive? For example, the use of biometrics.	No	
6. Will the process outlined in this document result in decisions being made or action taken against individuals in ways which can have a significant impact on them?	No	
7. As part of the process outlined in this document, is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For examples, health records, criminal records or other information that people would consider to be particularly private.	No	
8. Will the process require you to contact individuals in ways which they may find intrusive?	No	
<p>If the answer to any of these questions is 'Yes' please contact the Data Privacy Team via Lpt-dataprivacy@leicspart.secure.nhs.uk In this case, ratification of a procedural document will not take place until review by the Head of Data Privacy.</p>		
Data Privacy approval name:	N/A	
Date of approval	N/A	

Acknowledgement: This is based on the work of Princess Alexandra Hospital NHS Trust

