

## **CHEME Privacy Notice for NHS Digital Data; Version 1, 8<sup>th</sup> August 2019**

### **Privacy Notice on handling NHS Digital Data for the Centre for Health Economics and Medicines Evaluation (CHEME) at Bangor University**

#### **Who are we?**

The Centre for Health Economics and Medicines Evaluation (CHEME) at Bangor University is a leading UK health economics centre and a core part of the Bangor Institute of Health and Medical Research (BIHMR). Our mission is to improve the health and well-being of the people in the UK by conducting specialist research in pharmacoeconomic, pharmaceutical policy, medicines use, public health economics and the health economics of psychosocial interventions.

#### **What is this privacy notice for?**

This privacy notice is to provide you with details of the ways in which personal data received from NHS Digital is processed by CHEME, including how it is gathered, used, stored and shared.

#### **Who is responsible for the data?**

For the purposes of this privacy notice, Bangor University is a Data Controller, as defined in the General Data Protection Regulations (EU) 2016/679 (the 'GDPR') and the U.K. Data Protection Act 2018 (together the 'Data Protection Laws').

Bangor University ('Bangor') is registered with the Information Commissioner's Office and its entry can be found [here](#). Registration number: Z4855807.

We have an appointed Data Protection Officer who can be contacted as follows: Data Protection Officer, Bangor University, College Road, Bangor, LL57 2DG, UK. Email address: [gwenan.hine@bangor.ac.uk](mailto:gwenan.hine@bangor.ac.uk)

#### **What is the purpose of the health and care research?**

CHEME will use data on the use of services by the public in order to conduct economic analyses of health and social care. The aim is to study the way in which services are provided and the outcome of those services in order to improve the provision of health and healthcare services in the NHS and by extension improve the health and well-being of the people in the UK.

Information about the work we undertake can be found [here](#). There are four key areas we research within CHEME – these are: Public Health economics and the health economics of psychosocial interventions and other non-pharmacological health technologies; Pharmacoeconomics, pharmaceutical policy and medicines use; Improving research

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methodologies; and, supporting academic health researchers, NHS and social care researchers and local authorities across Wales. Specifically, we look at NHS Digital data to aid us in such topics as:

- Comparing NHS resource use such as inpatient stays and outpatient visits between differing treatment options for specific acute and chronic conditions.
- Measuring the effectiveness, efficiency and productivity of NHS care.
- Evaluating the costs and patient outcomes delivered by differing treatment options.
- Evaluating the impact on costs and outcomes of health and care policy and the way in which services are organised and paid for.

In all the projects the results inform health care policy nationally and/or locally in order to support decision-making, with the aim of making improvements to health and to health and care services delivered in the NHS.

### **What data do we have?**

All the data we receive from NHS Digital are depersonalised which means that we have no means of identifying an individual. We have data from Hospital Episode Statistics (HES) which relate to people who agreed to participate in clinical studies and attended hospital (e.g. as inpatients, outpatients, critical care or through Accident & Emergency departments). We do not have names, addresses or any other information that could be used to identify these individuals. We have data on:

- The patient trial number, age, gender and ethnicity;
- A “diagnostic code” that tells us what medical condition they were treated for and what treatment they received;
- A code identifying the type of hospital consultant responsible for care
- A Healthcare Resource Group code telling us how much and by whom the hospital was reimbursed for your treatment
- Admission and discharge dates, duration of stay and place of discharge and which hospital was attended.

Not all the data are used for every project and we maintain a register of which individual needs access for each project and we restrict researchers’ access to the data strictly on the grounds of the data required for their individual project.

### **Where do we get data from?**

The data are provided to CHEME at Bangor by NHS Digital using secure electronic file transfer (SEFT) and subject to a data sharing agreement. The data originates from users of healthcare services and are provided in depersonalised format which means that individuals

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cannot be identified in the data nor are they identifiable by the researchers who analyse the data.

### **What is our legal basis for processing your data?**

Under the General Data Protection Regulation (GDPR), the University has to identify a legal basis for processing personal data and, where appropriate, an additional condition for processing special category data. Some of the data we process (ethnicity and healthcare data) is in the category of special data. In line with our charter which states that we “advance and disseminate learning and knowledge by teaching and research”, the University processes personal data for research purposes under Article 6 (1) (e) of the GDPR: Processing is necessary for the performance of a task carried out in the public interest. Special category data is processed under Article 9 (2) (j): Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes.

### **How will we use your data?**

Data will be processed for the purposes outlined in this privacy notice, in order to conduct research involving the economic analysis of health and social care.

### **Will we share your data with third parties?**

No. Only authorised employees of CHEME at Bangor University will use the data.

### **How will we keep your data secure?**

CHEME and Bangor University have implemented appropriate technical and organisational measures to protect personal data and special category data. Access to information is restricted on a need-to-know basis and the University is committed to the principle of data protection by design and default. The data security arrangements at CHEME and the University form part of the Data Sharing Agreement with NHS Digital; they are documented and audited periodically.

### **Will we transfer your data internationally?**

No. Data will not leave the UK.

### **Will we identify you in any research outputs?**

No. The data we hold does not allow us to identify individuals.

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### **How long will we keep your data?**

We will only hold data that is necessary for a specific purpose and will only store it for the length of time required to serve this purpose (unless we are legally obliged to hold it for longer periods due to laws governing data archiving). As a minimum, your data will be retained for the duration of the funding of the projects and until outputs from the research have been published. Your data will be securely deleted when it is no longer required for its stated purpose and its required period of archiving has been met. Data will be destroyed safely, in accordance with the Data Protection Laws and in line with our agreement with NHS Digital governing secure data deletion methods.

### **What rights do you have in relation to your data?**

Under the Data Protection Laws, you have a general right of access to your data, a right to rectification, erasure, restriction, objection or portability. You also have a right to withdraw.

However, as we do not know the identity of the individuals in the depersonalised data we receive from NHS Digital, we are not able to request your consent directly nor are we able to tell if your details are included in the data we hold, hence we are unable to remove data relating to named individuals. If you would like to opt out and not have your NHS data used for research of this kind, please contact NHS Digital: [enquiries@nhsdigital.nhs.uk](mailto:enquiries@nhsdigital.nhs.uk).

Information about opting out can be obtained on their website:

<https://digital.nhs.uk/services/national-data-opt-out-programme>

### **Questions or concerns**

If you have any questions about this privacy notice or concerns about how your data are being processed, please contact Gwenan Hine on [gwenan.hine@bangor.ac.uk](mailto:gwenan.hine@bangor.ac.uk) in the first instance

### **Right to complain**

If you are unhappy with the way in which your personal data have been handled by CHEME or Bangor University you have a right to complain to the Information Commissioner's Office. For information on reporting a concern to the Information Commissioner's Office, see [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

We will place any updates to this privacy notice on this webpage.