

National Clinical Audit for Specialist Rehabilitation following Major Injury (NCASRI)

Fair Processing Notice

For a general guide aimed at patients and their families please refer to the existing patient leaflet which can be found on the NCASRI website. This document contains additional information as required by the new General Data Protection Regulations (GDPR) coming into effect on 25th May 2018.

Overview including the purpose for which data is being collected/processed

This audit is being led by London North West Healthcare NHS Trust together with its partners the Trauma Audit and Research Network and King's College London. It involves combining data from two existing sources:

- the Trauma Audit and Research Network (TARN) based at the University of Manchester which routinely collects information about patients receiving treatment in Major Trauma Centres, and
- the UK Rehabilitation Outcomes Collaborative (UK ROC) based at London North West University Healthcare NHS Trust which routinely collects information about patients receiving rehabilitation in one of the level 1 or level 2 specialist rehabilitation in England (plus a number of other "slow stream" specialist rehabilitation services).

The purpose of the audit is to link these two existing sources of data to look at:

- Helping to identify trauma patients who need specialist rehabilitation
- Determining whether patients who were identified as needing specialist rehabilitation whilst in one of the Major Trauma Centres subsequently received it
- Measuring the level of improvement achieved in patients who did receive specialist rehabilitation
- Seeing if it is possible to use other sources of information such as "Hospital Episode Statistics (HES)" which records information about all inpatient stays within the NHS and ONS Mortality Data (which records all deaths) to determine what happened to patients who were identified as needing specialist rehabilitation but did not receive it.

The audit uses information routinely collected by hospital staff within Major Trauma Services and Specialist Rehabilitation Units and does not involve patients being asked to provide any additional information or undergo any additional clinical tests. Information collected by the audit will be de-identified before being analysed by the members of the audit team.

The audit only publishes reports describing the care received by groups of similar patients in terms of their complexity and needs for care. It does not publish information on individuals, and personal details will not be made public.

The information produced by NCASRI will be used to:

- Produce information on the quality of care received by patients having specialist rehabilitation in NHS hospitals.
- Provide patients with information about trauma and rehabilitation services at different hospitals, such as what types of rehabilitation work best for which individuals.
- Improve treatment of patients requiring specialist rehabilitation following major injury.
- Help plan and develop NHS services.

Data Controller

The NCASRI audit was commissioned by the Health Quality Improvement Programme (HQIP) as part of the National Clinical Audit and Patient Outcomes Programme (NCAPOP). HQIP act as the Data Controller, and therefore have overall responsibility for the collection, processing and storage of patient data being used by this audit. Further information about HQIP can be found on their website: <http://www.hqip.org.uk/>.

Data Protection Act Registration

This audit is being led by London North West University Healthcare NHS Trust which is registered with the Information Commissioners Office (reference ZA083643).

Legal Basis for Processing Data under GDPR

Data is being processed under the “Public Task” provision of GDPR.

The relevant sections of GDPR under which audits commissioned by HQIP as part of the National Clinical Audit and Patient Outcomes Programme operate are:

- **Article 6 (1) (e)** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
This is justified through commissioning arrangements which link back to NHS England, Welsh Government and other national bodies with statutory responsibilities to improve quality of health care services.
- **Article 9 (2) (i)** processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.
This is justified as all projects aim to drive improvements in the quality and safety of care and to improve outcomes for patients.

Common Law Duty of Confidentiality

Explicit approval to process information including NHS numbers, dates of birth and dates of death has been obtained through the Health Research Authority Confidentiality Advisory Group (reference: 16/CAG/0108).

Further information about the Health Research Authority Confidentiality Advisory Group can be found on their website at:

<https://www.hra.nhs.uk/about-us/committees-and-services/confidentiality-advisory-group>

Categories of Data

NCASRI collects information about the trauma and rehabilitation care you have whilst in hospital. Only information relevant to your trauma and rehabilitation care is collected.

The data used by the audit is stored confidentially and includes:

- Some limited personal details such as age and gender
- the length of hospital stay and type of injury
- the need for rehabilitation nursing and therapy
- the outcome measures, suitable to the individual improvement during rehabilitation
- NHS number, date of birth (used only to allow the data collected separately by TARN, UK ROC, HES & ONS to be linked together after which the data is de-identified by removing these fields)
- Month & year of death (for any patients who die)

Further details can be found on the NCASRI website or by contacting the audit team.

Location of Data

All data used by the audit is stored in a secure environment within the UK.

Retention Period

This audit is currently due to end on 30th November 2018.

Data will continue to be held separately by TARN & UK ROC after the end of the audit, however use of the combined TARN and UK ROC data will only continue if we obtain permission to do so.

Objections to Use of Data

Any patients who wish to be excluded from this audit should contact us using the contact details found at the end of this document. Should you wish to withdraw from the audit then this will not affect your healthcare in any way.

Other Patient (Data Subject) Rights

Please note that most of the data processing being carried out by this audit is being done using de-identified data that is no longer associated with a specific individual. However, where we are able to match data against a specific individual using their NHS number, then the following rights apply:

- **Right of Access**
The Data Protection Act & GDPR give people the right to ask for a copy of any information that is held about them. If you wish to make a data subject access request for a copy of any data that we hold about you then please contact the audit team using the details below.
- **Rights to Rectification**
Data collected by this audit reflects the opinion of the clinical team who were involved in providing each patients' care, and has been de-identified before use. However, if we hold data on you that is inaccurate, then you have a right to request that we rectify the information and/or exclude it from being used.
- **Data being processed under the "public task" provision of GDPR is exempt from the right to erasure, however you may object to your data being used as part of this audit.**
- **Data being processed under the "public task" provision of GDPR is exempt from the data portability requirements, however where data is still linked to a specific individual a copy may be requested under the "right of access".**
- **This audit is not using any automated processing/profiling to make decisions about individual patients.**

Enquiries & Complaints

If you have any questions or concerns about this audit or would like details of the Data Protection Officer responsible for this project please contact us using the details below.

If you have concerns about our use of data and are unhappy with our response, then you can contact the Information Commissioner's Office using the details on their website www.ico.org.uk or by phoning 0303 123 1113.

NCASRI Website

For further information about the audit can be found on the NCASRI website which is hosted by Kings College London.

<http://www.kcl.ac.uk/lsm/research/divisions/cicelysaunders/about/rehabilitation/National-Clinical-Audit-.aspx>

Contact Details

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