



PRIVACY NOTICE

Continuous Inpatient Experience Survey

NOVEMBER 2021

The **Mater Misericordiae University Hospital** (*The Mater Hospital*) holds responsibility as Data Controller under the provisions of the Data Protection Acts 1988 - 2018 and the General Data Protection Regulations (EU) 2016/679, hereafter referred to as the GDPR.

The Mater Hospital was selected as a pilot site for a Continuous Inpatient Experience Survey for a period of 5 months from 01/11/2021 -31/03/2022.

Why do we collect personal information?

Most of the personal information we process is provided to us directly by you for the provision of healthcare services (Direct Care) and to improve services and plan for the future (Indirect Care).

The Mater Hospital collects personal information to send surveys to eligible survey participants and processes responses to surveys.

The objective of the survey is

- ▶ to capture patient's feedback on their experience of the care provided by the Mater Hospital and to use their feedback to improve care; and
- ▶ to pilot a continuous patient experience survey.

Collecting this information is necessary to carry out surveys of health care. The results of surveys are used to improve the quality of care and are therefore carried out in the public interest.

What is our legal basis for processing data?

The Mater Hospital complies with data protection laws, including the GDPR.

Lawful basis

- ▶ Under Article 6(1)(e) of the GDPR and Section 38 of the DPA 2018, personal data can be collected and processed where necessary for the performance of a task carried out in the public interest.
- ▶ Under Article 6(1)(f) – it is in the legitimate interests of the hospital to process patient personal data to invite them to take part in the survey.

Condition for Processing Special Category Personal Data

- ▶ Under Article 9(2)(i) of the GDPR and Section 53 of the DPA 2018 permit the processing of healthcare data, which is “special category data” in the public interest which include ensuring high standards of quality and safety of health care.

The Mater Hospital Continuous Inpatient Experience Survey is conducted in accordance with the National Standards for Safer Better Healthcare 2021 and the public interest. The processing of personal data is necessary to conduct the survey which will capture feedback from patients on their experience of using Mater Hospital services

What data do we process?

Invitation to participate in a survey

Personal data, including personally identifiable information is collected during the survey sample period i.e. 01/11/2021 – 31/05/2022. It is collected for the sole purpose of administering the pilot survey on the experience of people who have spent 24 hours or more in the Mater Hospital.

First Name	e.g. Ciara
Telephone Number	e.g. 087 1234567
Admitting Ward	e.g. Our Lady’s ward
Admission Speciality	e.g. Respiratory
Discharge Ward	e.g. St. John’s ward
Discharge Speciality	e.g. Medicine for the Older Person

During the survey period, the Mater Hospital will extract eligible participant’s information on a weekly basis and exchange this information with the data sub-processor (see Data Processors and Sub-Processors section below) to administer the survey. The first name and mobile telephone number of people who are eligible to participate are used to send a personally addressed SMS message plus 1 reminder SMS message to their mobile telephone with a link to the survey. Information on admitting and discharge ward and specialty is collected to help us to guide targeted Quality Improvement plans and initiatives.

All personally identifiable data will be deleted by the end of the survey period (31 May 2022).

Survey responses

Survey responses will be used by the Mater Hospital to

- ▶ Help us to guide targeted Quality Improvement plans and initiatives, to improve patient experience
- ▶ review the value of the feedback from the survey at directorate, specialty and ward level in the context of identifying areas of good practice and areas that need improvement
- ▶ evaluate the process for carrying out a continuous patient experience survey

How we store your personal information

Your personal data is securely stored on the Mater Hospital Patient Administration System (PAS). Personal data for eligible participants will be extracted from the PAS. Once extracted from the PAS we will send the contact dataset to the sub-processor to administer the survey. Once the contact data set is sent, it is immediately deleted by the Mater Hospital.

Personal data that is sent to the sub-processors is stored securely for the following time periods

Sub-Processor	Cemplicity	21 days from date of invitation
Sub-Processor	Neon Communication s Solutions LTD T/A Cadoo	Patient telephone number and first name is pseudonymised after 7 days and destroyed after 12 months, in line with the Communications (Retention of Data) Act 2011.

Rights of data subjects

We ensure that all data subjects' rights are upheld to ensure complete transparency when it comes to how we manage, process and retain personal information. As a data subject, you have

- ▶ The right to access information (Article 15 of the GDPR)
- ▶ The right to rectification (Articles 16 & 19 of the GDPR)
- ▶ The right to be forgotten (Articles 17 & 19 of the GDPR)
- ▶ The right to data portability (Article 20 of the GDPR)
- ▶ The right of restriction (Article 18 of the GDPR)
- ▶ The right to object (Article 21 of the GDPR)
- ▶ The right to be informed (Article 13 & 14 of the GDPR)

Data security

Physical and technical security measures are in place to ensure all data collected and processed by the Mater Hospital has adequate protection that is consistent with applicable privacy and data protection laws.

Data processors and sub-processors

To carry out the survey the Mater Hospital has entered into a contract with the Health Information Quality Authority (HIQA).

HIQA are contracted to the Mater Hospital to process personal data on behalf of the Mater Hospital in order to carry out the survey.

HIQA have sub-contracted some of the services provided to the Mater Hospital to other organisations. HIQA are contractually required to ensure that any of the sub-processors that they use are able to provide the same level of data protection. The table below lists the processors and sub-processors.

Role	Organisation name	Service Provided	Location
Data Processor	Health Information Quality Authority	Administering the Survey	Ireland
Sub Processor	Behaviour and Attitudes Ltd.	Administering the Survey	Ireland
Sub-Processor	Cemplicity	Administering the Survey	New Zealand/ UK
Sub-Processor	Neon Communications Solutions LTD T/A Cadoo	Sending text message to participants	Ireland

If you would like to access the privacy notices of the Data Processors, please click on the links below

- ▶ **HIQA Privacy Notice**
- ▶ **Behaviour and Attitude Privacy Notice**
- ▶ **Cemplicity Privacy Notice**
- ▶ **Neon Communications Solutions LTD T/A Cadoo Privacy Notice**

International transfers

In processing the SMS survey, the HIQA uses the services of a data processor, Cemplicity, which is based outside the EEA. In these circumstances, the HIQA transfers personal data outside the EEA. The HIQA is contractually required to ensure the same degree of protection is afforded to all personal data transferred outside the EEA. This is achieved by putting in at least one of the safeguards set out in the GDPR to protect personal data being transferred internationally. These safeguards include

- A. Transferring personal data to countries that have been found to provide an adequate level of protection for personal data.
- B. Using specific approved contracts with our service providers that are based in countries outside the EEA. These contracts give personal data the same protection it has in the EEA.
- C. For service providers in the US, personal data is transferred in accordance with Privacy Shield scheme.

The European Commission has determined, that the UK and New Zealand offer an adequate level of data protection for personal data. Information on the European Commission's Adequacy Decision is available [HERE](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Making a complaint

We hope you have found this privacy notice useful and we are always happy to hear your feedback. If you have any queries about how the Mater Hospital has handled your personal information for the purpose of this survey, or you would like any further information, please contact the Mater Hospital's Data Protection Officer using the contact details below.

You also have the right to make a complaint to the Data Protection Commission directly by phone, email or post. The contact details of the Data Protection Commission are available [HERE](#).

Contact details

If you have any queries regarding the Mater Hospital's data protection practices, please do not hesitate to contact us at the below details

Data Protection Office dataprotection@mater.ie +353 (01) 803 4311	Patient Services Dept. patientservices@mater.ie +353 (0)1 803 2206	Data Protection Officer dpo@mater.ie +353 (0)1 803 4035
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