

Privacy Notice – University of York

This privacy notice sets out the ways in which the University of York gathers, uses, stores and shares your data. It also sets out how long we keep your data and what rights you have in relation to your data under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Who is responsible for the data?

For the purposes of this privacy notice, the University of York 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').

The University of York ('York') are 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, University of York, Heslington, York, YO10 5DD, UK. dataprotection@york.ac.uk

Who is conducting the research?

The research is conducted by researchers at the University of York.

What are the objectives of the research and the purpose of using your data?

The project is '*Evaluating the health inequality effects of the Best Practice Tariff for hip fracture*'. The objective of this research is to assess whether the introduction of the best practice tariff for fragility hip fracture and subsequent changes to its components a) changed practice differently for different population groups and b) led to changes in health inequalities across the population of England. The purpose of this research is to inform policymakers in the English NHS about the health inequality impact of this health policy so that they can consider this in future re-designs. The research is funded by the National Institute for Health Research as part of a wider project "*NIHR200417-Evidence to support efficient and effective reduction of health inequality*" (PI: Prof. Susan Griffin).

Where do we get your data from and what data do we have?

For this research, we will use data from the *National Hip Fracture Database* (NHFD), provided by the Falls and Fragility Fracture Audit Programme (run by the Royal College of Physicians (RCP) on behalf of Healthcare Quality Improvement Partnership (HQIP)) under Data Sharing Agreement FFFAP/2020/004. These data relate to patients admitted to hospital with hip and femoral fractures and contains information on patient characteristics (including age, sex and ethnicity) and the care participants received (including procedures, hospital admissions).

The data held by the University of York originate from users of healthcare services and are provided in pseudonymised / de-identified format which means that individuals are not identified in the data nor are they identifiable by the researchers who analyse the data.

York holds the minimum amount of data necessary for the study.

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 data concerning health) is in the category of special data.

The linked NHFD, HES and civil registration data are processed under Section 251 NHS Act 2006, which permits the processing of patient identifiable data without consent.

In line with the University of York's charter which states that we advance 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 a detailed analysis of the health inequality impact of the health policy described above. Your data will not be subject to automated processing or profiling.

Will we share your data with third parties?

No. Information will be treated as confidential and shared on a need-to-know basis only. Data will not be shared with any third parties. Only authorised employees of the Centre for Health Economics at the University of York will use the data. York may need to disclose the data to a regulator or to otherwise comply with the law.

How will we keep your data secure?

The Centre for Health Economics and the University of York 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 the Centre for Health Economics and the University form part of the Data Sharing Agreement with HQIP, 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.

How long will we keep your data?

Data will be retained for the duration of the funding of the projects and until outputs from the research have been published. 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. Please note not all rights apply where data are processed purely for research purposes. For further information see: [Individuals Rights](#). However, as we do not know the identity of the individuals in the pseudonymised data we receive from HQIP, 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 data used for research of this kind, please see <https://www.rcplondon.ac.uk/projects/outputs/fffap-data-processing-statements> and <https://digital.nhs.uk/services/national-data-opt-out>.

Questions or concerns

If you have any questions about this privacy notice or concerns about how your data are being processed, please contact che-dgg-group@york.ac.uk. Queries can also be directed to the University of York's Data Protection Officer at dataprotection@york.ac.uk

Right to complain

If you are unhappy with the way in which your personal data have been handled by the University of York you have a right to complain to the Information Commissioner's Office. [Information on reporting a concern to the Information Commissioner's Office.](#)

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