



National
Patient
Experience
Survey

National Patient
Experience Survey
Programme

Data Access Request
Policy



National Patient Experience Survey Programme

Data subject access request policy

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Author:	National Patient Experience Survey team
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1. Background

The National Patient Experience Survey Programme is a nationwide survey programme asking patients about their experience in hospitals in Ireland. The survey programme is a partnership between the Health Information and Quality Authority (HIQA), the Health Service Executive (HSE) and the Department of Health. HIQA, as the lead partner in this initiative, is responsible for the implementation of the National Patient Experience Survey Programme.

HIQA has contracted an agent, which is responsible for the distribution of surveys in the context of the National Patient Experience Survey Programme. A contract, in addition to a Data Sharing Agreement, has been signed between both parties and outlines the roles and responsibilities of the agent in its capacity as data processor on behalf of HIQA.

Data controller and data processor roles and responsibilities

HIQA acts in the capacity of data controller for all of the data that it or its agent collect as part the National Patient Experience Survey Programme.

HIQA's agent acts in the capacity of data processor on behalf of HIQA for all of the data that it processes as part of the National Patient Experience Survey Programme.

Legal context

The European Union (EU) General Data Protection Regulation General Data Protection Regulation (GDPR) 2016 outlines the roles and responsibilities of data controllers, that is organisations or individuals who hold and process personal information. The legislation lays down strict rules to safeguard the privacy rights of all individuals who have their personal data stored by a data controller, in this case, HIQA. For more information, please see the National Patient Experience Privacy Notice and Information Governance framework at www.patientexperience.ie.

2. Purpose of the policy

The purpose of this document is to outline the survey programme's policy in relation to the management of data access requests, which are submitted by individuals (data subjects) to the National Patient Experience Survey Programme. A data access request enables a data subject to gain access to any personal information held about them by the survey programme.

The policy covers the collection of all personal information gathered by the National Patient Experience Survey Programme. It promotes the right of data subjects to submit a data access request in order to obtain a copy of information held on them, in electronic or hard copy format, by the data controller.

It also outlines the procedure to be followed by data subjects when submitting a data access request for data collected by the National Patient Experience Survey Programme.

Please refer to Appendix 1 for a step by step procedure on how to submit a data access request.

3. Policy Statement

HIQA, in its capacity as data controller for any of the data gathered as part of the National Patient Experience Survey Programme, must meet its obligation to provide an individual with a copy of his or her personal information upon request.

4. Scope of this document

This policy outlines how the National Patient Experience Survey Programme will meet its legal obligations upon receipt of a data access request. The scope covers all personal data that is collected for the purpose of administering surveys.

Article 15 of the General Data Protection Regulation enables a data subject **to find out**, if an individual or an organisation holds information about them. This is outlined in more detail in section 6.

In addition, article 15 of the General Data Protection Regulation formalises the rights of data subjects to submit a request in order to **gain access to their personal data**. No fee applies unless the workload is exceptional.

5. Responsibility

The Director of Health Information and Standards in HIQA, has overall responsibility for the implementation of this policy.

All data subject access requests should be addressed to the Data Protection Officer in HIQA who will ensure that appropriate action is taken. A list of contact details can be found on page 5 of this document.

6. Timeframe for request submission and response

If a data subject wishes **to find out** if the National Patient Experience Survey Programme holds information on them, a written request, by email or letter, is required.

To make a request under Article 15 of the General Data Protection Regulation and **gain access to** personal data held by the National Patient Experience Survey Programme, a data access request form can be downloaded from www.patientexperience.ie and can be used to submit a request.

In the event of a data subject wishing **to find out** if an individual or organisation holds information on them, data subject requests must be processed without delay.

A one month time frame applies in situations whereby a data subject wishes **to access** a copy of the personal information held on them. This time frame begins upon receipt of the written request.

Once the relevant information has been retrieved by the data controller, a response will be compiled for the data subject.

Please note that all participant contact details will be deleted at the end of the survey cycle. For example, if a survey runs for the month of May in a given year, all details will be deleted on 31 July which means that requests must be received by 17 July to allow a minimum of 10 days to process the request.

7. Breach or refusals

If HIQA fails to comply with a valid access request, or if the data subject is dissatisfied with the response to a request, they may lodge a formal complaint with the Office of the Data Protection Commissioner. The Office of the Data Protection Commissioner may then investigate the complaint, with consideration to their rights as a data subject.

Further details on data subjects' rights under the Data Protection Act are available on the Data Protection Commissioner's website (www.dataprotection.ie).

8. Training and awareness

Relevant employees of HIQA, including the Data Protection Officer, and HIQA's agent receive training on this policy. Training on this policy will be repeated, as required.

9. Review

This policy will be reviewed every three years or in light of any legislative changes or other relevant project requirements.

This policy is informed by the:

- European Union (EU) General Data Protection Legislation (GDPR) 2016

10. Revision history

Number	Effective date	Reason for update
01	1 May 2017	Original document release
02	1 May 2018	Changes in survey programme
03	25 May 2018	Change in data protection legislation

11. Individuals with responsibilities under this policy

<p>Brian Ahern Data Protection Officer Health Information and Quality Authority Email: infogovernance@hiqa.ie Tel: 021 240 9300</p> <p>Health Information and Quality Authority Unit 1301, City Gate, Mahon, Cork, T12 Y2XT.</p>	<p>Rachel Flynn Director of Health Information and Standards Health Information and Quality Authority</p>
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Appendix 1

Procedure for submitting a data access request

1. Making an access request

All data subject access requests must be submitted to the Data Protection Officer in HIQA, by email or post.

- If you would like to **find out** if the National Patient Experience Survey Programme holds any information on you, please write to the Data Protection Officer in HIQA. You will need to provide us with your name and address as well as a copy of a form of identification.
- If you would like to make a request under Article 15 of the General Data Protection Regulation and **gain access to a copy** of your personal data, please download the data access request form from <https://www.patientexperience.ie/about-the-survey/information-governance/>.
- When filling in the form, please be as specific as possible about the information you wish to access; include any additional details which may help to locate the information you are seeking, such as the hospital you attended, date of admission, date of discharge and so on. The names and codes of the hospitals that participate in the National Patient Experience Survey Programme are contained in Appendix 2. Please refer to these in your request to facilitate retrieval of any information held on you.
- If a third party (for example, a family member) is submitting a data access request on your behalf, written authorisation is required from you in order for the data controller to disclose your personal data to the relevant third party.

2. Identification

The data controller is entitled to request evidence of identity from the individual in order to check that the request is valid and to ensure the information is not disclosed to the wrong person, in order to safeguard your privacy.

Therefore, we would ask that you include a form of identification. Acceptable forms of identification include a copy of a passport, driving licence or birth certificate. All copies of identification documents that accompany your requests will be securely destroyed once your identity has been verified.

3. Submitting the request

If you would like to submit a request or if you have a query on how to make a data access request under the Data Protection Act, please contact us at infogovernance@hiqa.ie or alternatively you can write to us at the address below:

Data Protection Officer
Health Information and Quality Authority
Unit 1301
City Gate,
Mahon
Cork,
T12 Y2XT.

Appendix 2

Hospital codes to use when submitting a data access request

Please identify your hospital's code from the list below and ensure it is included in the appropriate section of your data access request and also on the narrative as part of the electronic bank transfer.

Saolta University Health Care Group	
Hospital Name	Hospital code
Galway University Hospitals	GUH
Letterkenny University Hospital	LUH
Mayo University Hospital	MUHM
Portiuncula University Hospital	PUH
Roscommon University Hospital	RCH
Sligo University Hospital	SUH
University of Limerick Hospital Group	
Hospital Name	Hospital code
Croom Orthopaedic Hospital	ULCOH
St. John's Hospital	ULSJH
Ennis Hospital	ULHE
Nenagh Hospital	ULHN
University Hospital Limerick	UHL

Ireland East Hospital Group	
Hospital Name	Hospital code
Cappagh Orthopaedic Hospital	COH
Mater Misericordiae University Hospital	MMUH
Midland Regional Hospital Mullingar	MRHM
Our Lady's Hospital	OLH
Royal Victoria Eye and Ear Hospital	RVEEH
St. Colmcille's Hospital	SCH
St. Luke's General Hospital	SLGH
St. Michael's Hospital	SMH
St. Vincent's University Hospital	SVUH
Wexford General Hospital	WGH
Dublin Midlands Hospital Group	
Hospital Name	Hospital Code
Midland Regional Hospital Portlaoise	MRHP
Midland Regional Hospital Tullamore	MHRT
Naas General Hospital	NGH
St. James' Hospital, Dublin	SJH
Tallaght Hospital	THD
RCSI Hospital Group	
Hospital Name	Hospital Code
Beaumont Hospital	BHD
Cavan and Monaghan Hospital Group	CMH

Connolly Hospital	CHB
Louth County Hospital	LCH
Our Lady of Lourdes	OLOL
South South-West Hospital Group	
Hospital Name	Hospital Code
University Hospital Waterford	UHW
Bantry General Hospital	BGH
Cork University Hospital	CUH
Lourdes Orthopaedic Hospital Kilcreene	KOH
Mallow General Hospital	MGH
Mercy University Hospital	MUHC
South Infirmary Victoria University Hospital	SIVUH
South Tipperary General Hospital	STGH
University Hospital Kerry	UHK

