

Reference 14-327 – Privacy Notice – last updated 19th July 2018



Data Controller

The sole Data Controller is Civil Eyes Research. There is no other Data Controller.

There are no joint Data Controllers and data are not transferred to or processed by any third parties.

The Data Controller contact details are:

Civil Eyes Research (West Midlands)

Priors Lee Cottage

Frog Lane

Welford on Avon

Warwickshire CV37 8EQ

Email: gbick@civil-eyes.com

Telephone: 01789 751221

The Data Protection Officer details are:

Geoff Bick

Director

Civil Eyes Research (West Midlands)

Priors Lee Cottage

Frog Lane

Welford on Avon

Warwickshire CV37 8EQ

Email: gbick@civil-eyes.com

Telephone: 01789 751221

Level of Data Collected

Civil Eyes Research analyses Hospital Episode Statistics (HES) data which are obtained from NHS Digital. HES data are a compilation of organisational, administrative and selected clinical information that is derived from hospitals' Patient Administration computer systems.

Data are in pseudonymised form and are never directly linked with other datasets which could allow re-identification of HES data. These data are categorised by the GDPR as sensitive.

Purpose for which the Data are Processed

The objective of Civil Eyes Research is to provide analysis and interpretation of performance and quality issues within healthcare to doctors, clinicians and managers of NHS and Social Care providers using benchmarking of HES data alongside the deployment of Civil Eyes Research's (CER's) own accumulated healthcare expertise over thirty years, within CER and elsewhere.

Civil Eyes Research has two principal directors who have long and significant track records within the healthcare sector where they have held a range of roles. They joined Civil Eyes Research in 2005 to provide services whereby doctors and managers could use data to understand service provision and effectiveness.

Civil Eyes Research is commissioned by Chief Executives and Medical Directors of NHS organisations to provide analysis and advice in order to promote discussion and action on efficiency, productivity, effectiveness, quality and access to services. Engagement with doctors and managers results in higher commitment to better coding, improved understanding of case mix and more robust use of information in the health service.

Civil Eyes Research requires HES data for use in its Benchmarking Clubs where hospitals work together to review and understand the data and performance; they are: Medical Productivity within NHS organisations, Pathology networks and Specialist Children's Hospitals.

The members of the three clubs are drawn from teaching, district general and Specialist Children's Hospitals across the UK.

The funding stream for the work consists of subscriptions paid by participating hospitals.

The benchmarking work was initiated through a combination of the CER directors offering services to healthcare organisations and also the original involvement of the Association of University Hospitals in the UK.

Client engagements are either long-standing from Civil Eyes Research's inception, as a result of the directors' previous work within healthcare services, or have occurred by "word of mouth" recommendation.

The aim of the work is to improve patient care, pathways, healthcare services and value for money, specifically:

- Improvement in patient care due to increased clinical productivity and the reduction in variability across the healthcare system in England.
- Enhanced efficiency within clinical services improving capacity and access to services for patients.
- Evaluation and benchmarking of NHS organisations helping to increase quality and outcomes for patients.
- Providing insights and evidence to support providers in developing local services to provide the best care possible for their patients.
- Better use and understanding of information within the NHS for all disciplines, specialties and hospitals with which Civil Eyes Research works.

The Medical Productivity and Specialist Children's Hospitals workstreams have been taking place for twelve years, while the Pathology network benchmarking has been taking place for five years.

Civil Eyes Research has been using HES data for twelve years.

England-wide data from NHS Digital is required to see the entirety of patients' encounters with health services within a healthcare network, to look at patterns of care across providers such as readmissions and extended lengths of stay, to provide peer groups and to derive comparative provider and population-based performance measures.

Civil Eyes Research is required by clients to:

- Provide evidence of national best practice
- Provide performance within a national or local context
- Provide information on patient flows to tertiary, regional or national services and centres
- Provide local market reviews of comparable providers

Civil Eyes Research uses HES data to provide analysis of clinical performance and benchmarking information to hospitals covering areas such as lengths of stay, day case rates, readmissions, same day operations, depth of clinical coding and clinical performance within specialties.

Civil Eyes Research organises national workshops for service managers and lead clinicians at specialty or function level. At these events there is multi-disciplinary discussion using benchmarked activity data, best national practice and local experiences. Service managers and lead clinicians are then invited to submit their recommended service changes to their local management teams.

In addition, Civil Eyes is asked to visit hospitals to share workshop analysis for in-depth review with local management teams.

CER has used and plans to continue to use four HES datasets:

- Admitted care
- Outpatients
- Accident & Emergency
- Critical Care

These datasets provide good coverage of hospitals' activities and enable the benchmarking work to be undertaken.

The legal basis of the data processing

The legal basis for data processing is:

General Data Protection Regulation (GDPR) Article 6, paragraph 1 (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child;

and

GDPR Article 9, paragraph 2 (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Data Sharing

The sole Data Controller is Civil Eyes Research.

Reports are only issued in aggregate form to clinicians and managers of NHS organisations within the UK. No record level data is shared with any third party organisation in any format.

Data Storage and Retention

Data will be stored for five years for the purpose of identifying trends in healthcare activity. After this period data will be deleted using a secure data destruction method.

Data are downloaded from NHS Digital via its secure electronic file transfer system to an encrypted, password protected laptop. Data are then transferred to, processed and held on a prime database server dedicated to the sole use of Civil Eyes Research; the server is not connected to a network. The data will be stored and processed at the single address specified.

The storage and processing address is:

Civil Eyes Research (West Midlands)

Priors Lee Cottage

Frog Lane

Welford on Avon

Warwickshire CV37 8EQ

The processing activities are the same for all three Benchmarking clubs.

There are no flows of data from Civil Eyes Research to NHS Digital.