



# National Rehabilitation Hospital

## Privacy Notice

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## 1. About This Notice

### 1.1 Purpose

The National Rehabilitation Hospital (NRH) is committed to ensuring the privacy and confidentiality of your personal information.

The NRH must comply with the General Data Protection Regulation (GDPR), and the Data Protection Acts 1988 to 2018, and any related or subsequent data protection and privacy legislation and amendments, as well as European Union Law including Regulation 2016/679, known as the General Data Protection Regulation (GDPR), and any subsequent implementing legislation and amendments, collectively referred to in this Privacy Policy as “Data Protection Legislation”.

This notice describes how the personal data we collect from you may be used and how you can access it. It outlines who this information may be shared with and how long it will be retained. Please review carefully.

The purpose of this Privacy Notice is to clearly communicate to you how the NRH handles your personal information. It will give you a better and more complete understanding of the type of personal information that the NRH holds about you and the way the NRH handles that information.

The purpose of this Privacy Policy is to clearly communicate to you:

- What personal information the NRH collects;
- Why the NRH collects this information;
- How the NRH handles or uses this information;
- How long the NRH will retain this information;
- Who the NRH will share this information with;
- Your rights in relation to the personal information that the NRH holds, including your right to access, change, or delete this information; and
- How you can contact the NRH in respect of this information.

The aim of this Privacy Notice is to give you a better and more complete understanding of how the NRH collects and uses your personal data.

### 1.2 Multi-layered Approach

This Privacy Notice has been developed in accordance with a ‘layered notice’. This means that it offers you the ability to obtain more or less detail about the NRH information handling practices depending on how much you wish to read, what you need to know and how quickly you need to obtain the relevant information.

You can contact the NRH if you would like to request access to any personal information which we hold about you. If you require more detailed information about the NRHs information handling practices, then you will need to read this document.

### 1.3 Keeping the Privacy Notice Current

This Privacy Notice was drafted in March 2023 and may change from time to time. The most up-to-date copy will be published on the NRH website or can be obtained by contacting us via the contact details set out at the end of this privacy notice.

## 2. What is the Legal Basis for processing your data?

### 2.1 Primary purpose - clinical (direct) care

When your **personal data** is used for the delivery of your rehabilitation care and administrative purposes, 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 Hospital (GDPR Article 6(1)(e)).

In circumstances where the hospital processes your **special categories of personal data** such as and including health data, this processing is necessary for the following reasons as set out in Article 9(2)(h) & Article 9(2)(i) of the GDPR:

- For the purposes of preventative or occupational medicine
- The assessment of the working capacity of the employee
- Medical diagnosis
- The provision of health or social care treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards
- 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 healthcare (e.g. Clinical audit) 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;

Where personal data and or special categories of personal data (including health data) is used to deliver emergency care, for example in an emergency medical situation, processing of the personal data may be necessary in order to protect the vital interests of the individual (data subject) or of another natural person GDPR Article 9(2)(c).

### 2.2 Secondary purpose - clinical purposes (indirect)

When there is a legal requirement that we provide specified data to the HSE or to other regulatory bodies such as HIQA, we rely on Article 6(1)(c) of the GDPR processing is necessary for compliance with a legal obligation to which the Hospital is subject.

When personal data is used for an unrelated or unexpected purpose for which the data was originally processed, such as research, the NRH will only process this data with your consent. Article 6(1)(a) of the GDPR sets out that the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

## 2.3 Research Purposes

In most instances we will rely on Article 6(1)(e) as above and Article 9(2)(j) of the GDPR if and when we use information for research. Individuals will be formally consented to take part in research, this will satisfy the duty of confidentiality. Where we rely on consent as the legal basis for processing, you can withdraw your consent at any time; this follows GDPR Art 6(1)(a), “the data subject has given consent to the processing of his or her personal data for one or more specific purposes; and Art 9(2)(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes. In some circumstances, consent exemptions may be granted by the Health Research Consent Declaration Committee (Health Research Regulations 2018).

## 2.4 Employees

Processing of personal data in most cases is necessary for the formation of a contract or processing is necessary for compliance with a legal obligation to which the Hospital is subject GDPR Article 6(1)(b)&(c).

# 3. How the National Rehabilitation Hospital Handles Your Personal Information

## 3.1 Legal Obligations

The National Rehabilitation Hospital is required to comply with Data Protection Legislation. As part of this the NRH is regulated by the Data Protection Commission (DPC). The DPC is the NRHs Supervisory authority. You have the right to complain to the DPC. Details on how to make a complaint to the DPC are set out further below.

The DPC is an independent public authority and regulates how the NRH collects, uses, discloses, and stores personal information and how individuals may access and correct the personal information that the NRH holds about them. For ease of reference, this Privacy Notice sets out the NRHs position with respect to patients and other individuals’ personal information separately, but we treat each group equally.

## 3.2 Data Protection Commission

You have the right to lodge a complaint with the Data Protection Commission (Supervisory Authority).

<b>By Letter:</b>	The Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.
<b>Email:</b>	<a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>
<b>Telephone:</b>	1800 437 737 or +353 1 7650100
<b>Website:</b>	<a href="http://www.dataprotection.ie">www.dataprotection.ie</a>

### 3.3 Terms Used

In this Privacy Notice, we use the terms:

**“Personal Data”** means any information relating to an identified or identifiable natural person (**“data subject”**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**“Data concerning health”** means personal data related to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information about his or her health status.

**“Primary purpose”** means the specific function or activity for which the information is collected. For the purpose of the NRH this is the provision of healthcare services and treatments. Any use or disclosure of personal information for another purpose is known as the **“Secondary purpose”**.

**“Processing”** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**“Pseudonymisation”** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**“Controller”** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**“Processor”** means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Controller.

**“Consent”** of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**“Personal data breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

**“Special Category Data”** means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

**“Supervisory Authority”** means an independent public authority which is established by a Member State pursuant to Article 51 (GDPR).

### 3.4 Who does the National Rehabilitation Hospital collect information from?

This Privacy Notice applies to the NRHs collection and use of patient, staff, volunteer and visitor personal information. Patient information is broadly collected from referring services (Community and Acute), pharmacies, next-of-kin, nominated contacts, nominated support persons, referring doctors, Public Health Nurses, all staff both clinical and support services such as Accredited Health Professionals, contracted health professionals, trainees (including medical professionals including registrars, fellows and advanced trainees), schools, approved researchers, students undertaking training placements in our facilities, contractors, suppliers, and service providers engaged by us, medical representatives attending our facilities and other individuals engaged by or providing services to the NRH.

#### 3.4.1 Patients

In order to provide you with the required healthcare services and treatments the NRH will need to collect and use your personal information. We collect personal information that is reasonably necessary to provide you with rehabilitation services and for administrative and internal business purposes related to your attendance.

We will usually collect your health information directly from you. Sometimes we may need to collect information about you from a third party, such as, a referring hospital, guardian or nominated contact.

#### 3.4.2 Understanding the Healthcare Record

Each time you visit or communicate with the NRH, a record is made. Verbal communication with any member of your healthcare team may also be recorded. Typically, this record includes, but is not limited to, your demographic information (name, address, date of birth), past medical diagnosis and medical history, presenting symptoms, examination and test results, goal setting information, treatment plans and the plan for your future care or treatment upon discharge. Your healthcare record is held both digitally and on paper and serves as a:

- Basis for planning your care and treatment
- Means of communication among the healthcare professionals involved in your care
- Legal document describing the care that you received
- Source of data for the NRH to continuously improve care delivered
- Source of education for healthcare professionals involved in your care
- Source for medical research (where prior consent is sought from you)

#### 3.4.3 Other individuals

To enable the NRH to engage with you for the relevant primary purpose, the NRH needs to collect and process your personal information. If you provide incomplete or inaccurate information to us or withhold personal information from us, we may not be able to engage with you as required to meet that primary purpose.

### 3.5 What Information does The National Rehabilitation Hospital Collect?

The NRH collects personal information that is reasonably necessary to provide you with necessary healthcare rehabilitation services for medical, administrative and internal business purposes, related to your attendance at the NRH.

Where the personal data of children (defined as those under the age of 16 years of age) is required we will only proceed with parental or guardian consent.

Personal Details about you including but not limited to:

- Your name
- Address
- Eircode
- Date of birth
- Gender
- Contact details
- Family, nominated contact details
- Medical Card Number
- Correspondence from GP's, Consultants, Hospitals & Community Services
- Public Health Nurse
- Allied Healthcare Professionals correspondence
- Details from other Healthcare Providers both Acute and Community
- Pharmacy Details and Medications
- Information about your health history
- Family health history
- Medical diagnosis and medical history
- Medical Care delivered prior to rehabilitation
- Medical History
- Photographs
- Video
- Employment/Educational/School information
- Individual Health Identifier (IHI)
- Ethnicity
- Current lifestyle
- Religious beliefs

This is not an exhaustive list.

This information will support and inform the healthcare team to ensure you are provided with the necessary specialist rehabilitation treatments and services.

We will collect your health information directly from you and from third parties (such as a relatives and other healthcare providers). Your personal information may include diagnostic data, medical reports, medications etc. and will be taken during your engagement with the NRH for the purpose of providing and tailoring your care to meet your specific needs. This information may take many forms, for example, medical and surgical reports, laboratory information, radiology imaging information. In all cases, the NRH will manage your personal information in accordance with the Data Protection Legislation and this Privacy Notice.

Where the NRH will collect your personal information to fulfil our healthcare provider obligations for healthcare services or treatment, failure by you to provide the above-mentioned personal information may render the NRH unable to provide the healthcare services.

### *3.5.1 Other Individuals*

The NRH will collect personal information from you that is reasonably necessary to engage with you for the primary purpose of the provision of rehabilitation services by the NRH, for functions or activities and for administrative and internal business purposes related to your dealings with the NRH.

## **3.6 How does the National Rehabilitation Hospital store your information and how long will the National Rehabilitation Hospital retain your information for?**

The NRH may store the personal information we collect from you in various forms, such as paper and digital. The NRH will comply with the Data Protection Legislation and this Privacy Notice in respect of your personal information in whatever form that information is stored by us.

### *3.6.1 Patients and Research Participants*

Storage of personal information may be in paper form and may also include digital storage including digital records, the electronic patient record system (TrakCare), radiology images (NIMIS), photos and videos, laboratory reports (this is not an exhaustive list).

### *3.6.2 Other individuals*

Personal information may be stored in various forms including electronic and/or paper systems in accordance with usual practices, and subject to the purposes of your engagement with the NRH.

### *3.6.3 Data retention*

The NRH is required by law to keep your personal information only for as long as is necessary for the purposes for which the NRH is required to use it. The period for which the NRH holds your personal information will be determined by several criteria, including the purpose limitation for which the NRH is using the information, such as the delivery of healthcare or employment, and the Hospital's legal and regulatory obligations.

In relation to patient information, the NRH follows the Health Service Executive (HSE) Record Retention Periods Policy guidelines and has embedded these into the NRH Retention Policies. For example, the NRH must retain personal data relating to adults for 20 years after your relationship with our organisation ends or 8 years after your death; and for Children the retention period is until the child's 26<sup>th</sup> birthday, or eight years after their death. If required by law the NRH may retain your data for longer periods.

If we retain your personal data for historical or statistical purposes, we will ensure that the personal data cannot be identified and is anonymised.

For more information on the NRH data retention practices, please contact the NRH Data Protection Officer using the contact details set out below.

### 3.7 NRH Data Protection Officer (DPO)

Data Protection Officer  
National Rehabilitation Hospital  
Rochestown Avenue  
Dun Laoghaire  
Co Dublin  
A96 RPN4  
Ireland

**Email:** [dpo@nrh.ie](mailto:dpo@nrh.ie)

**Telephone:** +353 1 235 5000

### 3.8 How does the National Rehabilitation Hospital use your information?

#### 3.8.1 Primary Purpose

The NRH uses your personal information for the primary purpose for which you have given the information (the delivery of healthcare), unless one of the following applies:

- The secondary purpose is related (or for Special Category Data, directly related) to the primary purpose for which you have given us the information and you would reasonably expect, or we have told you, that your information is usually disclosed for another purpose or to other individuals, organisations or agencies (see related Secondary purposes set out below);
- You have explicitly consented for us to use your information for another purpose, for example health research (as per the Health Research Regulation (2018));
- The NRH is required or authorised by law to disclose your information for another purpose (see related Secondary purposes set out below);
- The disclosure of your information by the NRH will prevent or lessen a serious and/or imminent threat to somebody's life, health or safety or to public health or public safety; or
- The disclosure of your information by the NRH is reasonably necessary for the enforcement of a criminal law or a law imposing a penalty or sanction, or for the protection of public revenues.

The NRH Hospital may use or disclose your personal information as specified above via electronic processes, where available or relevant.

#### 3.8.2 Related Secondary Purpose

The following is a non-exhaustive list of examples of related Secondary Purposes for which the NRH may use your personal information.

### 3.9 Examples:

#### *Use among health professionals to provide your treatment.*

Modern healthcare practices mean that your treatment will be provided by a multi-disciplinary team of health professionals working together.

You may be referred for diagnostic tests such as laboratory or radiology and our staff may consult with senior medical experts when determining your treatment. With developments in technology (e.g., telemedicine) our staff may consult with health professionals and medical experts, both public and private, located remotely, including outside the NRH, in relation to your diagnosis or treatment, including by sending health information and clinical images electronically. Our staff may also refer you to other health service providers, such as community, public and private, for further treatment during and following your admission for example, to the dentist, GP, or outpatient community health services. We may disclose your personal information to the relevant provider to the extent required for any such referral (including disclosing that information electronically).

Your personal information will only be disclosed to those healthcare workers involved in, or consulted in relation to, your treatment and associated administration and to the extent required to meet that purpose. These health professionals will share your personal information as part of the process of providing your treatment. We will only do this while maintaining confidentiality of this information and protecting your privacy in accordance with the law.

As part of your care, we may be required to disclose your information to third party medical suppliers for the purpose of ordering specific products or to enable appropriate follow up, for example, if you require prosthesis, certain pharmaceutical treatments or other medical devices and products as part of your treatment.

#### *Assessment for provision of healthcare services*

The NRH may collect your personal information for the purpose of assessing your suitability for healthcare services at the NRH. Where personal information is collected and you do not become a patient of the hospital, your personal information may be retained and/or shared with similar healthcare providers, such as The Royal Hospital Donnybrook or Peamount Hospital. Where your assessment has been conducted at the request of your Consultant or GP, the NRH will report the outcome of the assessment to that Consultant or GP as it may be relevant to any ongoing treatment or care provided to you by them. Where you undergo assessment or treatment by a third-party provider (for example Community Services) during your admission to the NRH for the purpose of transferring your care to that third party, the NRH may disclose your personal information to the third-party provider for that purpose.

#### *Your local doctor (GP) and Healthcare Providers*

The NRH will usually send an Interdisciplinary Discharge Report to your referring medical practitioner, nominated general practitioner, community services, Public Health Nurse, and similar care providers on discharge. This is in accordance with international norms and long-standing medical practice and is intended to inform your service providers of information that may be relevant to any ongoing care or treatment provided by them. This discharge report may

be sent to your referring medical practitioner or general practitioner electronically. If your nominated general practitioner has changed or your general practitioner's details have changed following a previous admission, you must let us know.

#### *Other health service providers*

If in the future you are being treated by a medical practitioner or healthcare facility (e.g. for transfer to another Rehabilitation Provider or Nursing Home) that needs to have access to the health record of your treatment, we will provide a copy or access to your record (limited to what is relevant) to that medical practitioner or healthcare facility provided this request is processed in the correct manner. We may provide information about your health records to other medical providers or healthcare services outside the NRH without your consent in the event of an emergency where your life or health is at risk as this is within your vital interests under the GDPR.

#### *Other Health and Service Providers*

The NRH may share your information amongst the service providers listed below for the delivery of care and services (this is not and exhaustive list);

Health providers:

- The Health Service Executive (HSE)
- Beaumont Hospital
- The Mater Hospital
- Childrens Health Ireland (CHI)
- The Royal Hospital Donnybrook
- Peamount Hospital
- St. Vincents University Hospital
- HSE Dental Services
- Opcare Ireland
- HSE Community Services
- General Practitioners (GPs)
- Public Health Nurses
- HSE Adult Safeguarding
- Tusla

And Service Providers such as:

- HealthLink
- NIMIS – National Integrated Medical Imaging System
- IHI – Individual Health Identifiers

#### *Students and Trainees*

The NRH supports the placement of students and trainees at the NRH, and these students and trainees may have access to your personal information for the purpose of the placement. Students and trainees on placement at the NRH are required to comply with the GDPR and all other relevant privacy legislation.

The NRH collects personal information from students or trainees on placement for the primary purposes of providing the placement and facilitating assessment. The purposes for the NRH using the personal information of students or trainees include:

- Managing the individual's placement;
- Ensuring the quality and safety of clinical care provided to NRH patients;
- Insurance purposes;
- Ensuring that it holds relevant contact information; and
- Satisfying its legal obligations including obligations under any placement agreement.

The NRH may also store information provided by students or trainees following placement for the purpose of future recruitment or employment opportunities.

*Nominated contact, relatives, close friends, registered Attorneys (under an Enduring Power of Attorney) or registered Decision Supporters*

We may provide information about your condition to your nominated contact, relatives, close friends, your registered Attorney under an Enduring Power of Attorney, or your registered Decision Supporter under the Assisted Decision-Making Capacity Act, unless you tell us that you do not wish us to disclose your personal information to any such person. If you are unable to express your wishes regarding who to share information with, a decision will be made in line with your known will and preference and to your benefit.

*Other common uses*

In order to provide the best possible environment in which to treat you, we may also use your personal information where necessary for:

- Activities such as quality assurance processes and service evaluations to assess standards of care, accreditation, clinical audits, risk and claims management, patient experience and satisfaction surveys and staff education and training;
- Invoicing, billing and account management, including storage of provider details on NRH billing software;
- The purpose of complying with any applicable laws – for example, in response to a subpoena or compulsory reporting to State authorities (for example, the National Incident Management System, the National Risk Registry);
- The purpose of sending you standard reminders, for example for appointments and follow-up care, by letter, text message or email to the number or address which you have provided to us;
- The NRH may anonymise or aggregate the personal information that we collect for the purpose of service management; monitoring, planning and development.

*Research*

To identify patients who might be suitable for research studies. While the primary purpose of the hospital is the treatment of patients, the hospital is also an institute of learning and innovation for clinical staff and conducts research in support of the continued development of future health treatments. There are strict regulations surrounding research and how it may be conducted. Suitable participants will be given full information about the research and asked

for consent to participate as per Data Protection Act 2018, Section 36(2), Health Research Regulations 2018.

#### *Research - retrospective chart reviews*

- (a) personal data collected by the NRH as data controller for the provision of health care to an individual may be used by the controller (NRH) for a retrospective chart review study but not disclosed to another person (a third party) by the controller for a retrospective chart review unless such data is anonymised;
- (b) any findings from the study that are published must not identify an individual whose personal data was used in the study, and
- (c) the study will be reviewed and approved by the NRH Ethics Committee prior to commencement of the study.

Information routinely collected by the Hospital may be anonymised for the purposes of research and shared with other organisations with a legitimate interest in healthcare and its management, including universities and research institutions.

#### *Application for accreditation by health professionals*

The NRH collects personal information from health professionals seeking accreditation and submitting to the credentialing process. Personal information provided by health professionals in this context is collected, used, stored and disclosed by the NRH for the purposes of fulfilling its obligations in connection with the accreditation sought.

#### *Application for accreditation for Rehabilitation Services*

The NRH is accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF). CARF accreditation ensures the NRH team are providing patients with care that meets internationally accepted standards and promotes person-focused standards of care delivery.

#### *Job applications*

The NRH collects personal information of job applicants who have responded to an advertised position for the primary purpose of assessing and (if successful) engaging applicants. The purpose for which the NRH uses personal information of job applicants includes:

- Managing the individual's employment, engagement or placement;
- Insurance purposes; and
- Revenue requirements
- Ensuring that it holds relevant contact information.

The NRH may also store information provided by job applicants who were unsuccessful for the purposes of future recruitment or employment opportunities.

#### *Uses with your consent*

With your consent we may also use your information for other purposes, such as sharing your information with private care providers, your legal representative etc.

### *CCTV:*

The NRH uses camera surveillance systems (commonly referred to as CCTV) throughout the hospital and grounds for the purpose of maintaining the safety and security of our staff, patients, visitors, and other attendees. The NRH CCTV systems may, but will not always, collect and store personal information. The NRH will comply with the Data Protection Legislation and this Privacy Notice in respect of any personal information collected via its CCTV systems.

In limited clinical locations necessary clinical CCTV is in operation for specific clinical purposes. This CCTV is not recorded and accessed only by necessary staff.

### *Contractors under agreement:*

The NRH may provide, or allow access to, personal information to contractors engaged to provide professional services to the NRH such as Information Communication Technology providers or to contractors with whom aspects of our services are outsourced. Where we outsource any of our services or hire contractors to perform professional services within our hospitals, this will be done as part of a Service Provider Agreement which contains a Data sharing component that complies with Data Protection Legislation where applicable.

### *Education and community engagement*

The NRH may offer opportunities for transition year students, students, and health practitioners to participate in educational events or seminars for the purpose of continuing professional development or community engagement. When you register for or attend an event, the NRH may collect your personal information for the purpose of providing the service and recording your attendance.

The NRH may disclose your personal information to third parties for the purpose of confirming your attendance at the event including the provision of attendance records or certification.

### *Clinical Audit*

Clinical audit is a quality improvement process that seeks to improve patient care and outcomes through systematic review of care against explicit criteria and the implementation of change.

Aspects of the structure, process and outcomes of care are selected and systematically evaluated against specific criteria. Where indicated, changes are implemented at an individual, team or service level, and further monitoring is used to confirm improvement in healthcare delivery. This is described as the audit loop. The key component of clinical audit is that performance is reviewed (or audited) to ensure that what should be done is being done, and if not, it provides a framework to enable improvements to be made.

Clinical audit is **NOT** research.

Clinical audit is at the heart of clinical governance:

- It provides the mechanisms for reviewing the quality of everyday care provided to patients with common conditions.
- It builds on a long history of doctors, nurses and other healthcare professionals reviewing case notes and seeking ways to serve their patients better.
- It addresses quality issues systematically and explicitly, providing reliable information
- It can confirm the quality of clinical services and identify if there is a need for improvement.

#### **Will the NRH tell me if my information is being used in clinical audit?**

You will not be contacted directly, and you do not need to give your consent if we use your healthcare information for a clinical audit. This is because your name and personal details are either not used or kept confidential and are not included in the audit findings and audit report.

Sometimes a clinical audit involves patients taking an active part in the audit process and your personal details are an important part of the audit. In this type of audit, you will be asked to give your consent.

## **4.0 Access to and correction of your personal information**

You have the right to request from the NRH at any time access to your personal data which we hold (such as your healthcare record), as well as many other rights such as to rectify, restrict or erasure of your personal data (this is not an exhaustive list of your rights and specific conditions must be met under the Data Protection Acts 1988-2018 and the GDPR).

The NRH will provide access or make the requested changes unless there is a reason under the GDPR or other relevant law to refuse such access or refuse to make the requested changes. If we do not agree to change your personal information in accordance with your request, we will permit you to make a statement of the requested changes and we will enclose this with your personal information. Should you wish to obtain access to or request changes to your personal information held by the NRH, please contact;

The Data Protection Officer at [dpo@nrh.ie](mailto:dpo@nrh.ie) or the Access to Records/ Freedom of Information Officer at [foi@nrh.ie](mailto:foi@nrh.ie) and a subject access request (SAR) form or freedom of information (FOI) form will be provided. Access to records can be provided under either Data Protection or Freedom of Information Laws.

- Access to Records/Freedom of information Officer [foi@nrh.ie](mailto:foi@nrh.ie)
- Data Protection Officer [dpo@nrh.ie](mailto:dpo@nrh.ie)

## 4.1 Data quality

The NRH will take the necessary reasonable steps to ensure that your personal information which we may collect, use or disclose is accurate, complete, and up to date.

## 4.2 Data security

The NRH Team are committed to ensuring that your information is secure with the Hospital and with the third parties who act on the Hospital's behalf. The NRH will take all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. The NRH has numerous security precautions in place to prevent the loss, misuse or alteration of your information including the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect your privacy.

Staff working for the NRH have a duty to keep your information confidential and staff are provided with mandatory data protection training to ensure data protection standards are maintained. The NRH has strict information security policies and procedures in place to ensure your personal information is safe, whether it is held in paper or electronic format.

### 4.2.1 Cross border disclosure

The NRH may enter into arrangements with third parties to process and store the data we collect to provide services; this may include your personal information. These third parties may reside outside of the European Economic Area including countries which do not provide equivalent protection for personal information.

The NRH will take all necessary and proportionate reasonable steps to ensure that the third parties do not breach the requirements of European Data Protection Legislation and will endeavour to implement appropriate measures to ensure that your personal information is adequately protected in accordance with the Data Protection Legislation.

The steps the NRH Hospital will take may generally include:

- Transferring personal information where the recipient has agreed to a European Commission approved data transfer agreement in the form of the Standard Contractual Clauses which will ensure that the third party is bound by privacy protection obligations which are the same (or substantially the same) as those which bind the NRH and requiring that the third party has information security measures in place which are of an acceptable standard and approved by the NRH;
- Transferring personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission; or;
- Occasionally, we may transfer your personal information in circumstances where there are no adequate safeguards where this is permitted by Data Protection Legislation.

## 5.0 Complaints

### Making a Complaint

Where you believe your privacy rights have been compromised or infringed, please let us know by contacting the data protection officer for the NRH [dpo@nrh.ie](mailto:dpo@nrh.ie).

You may also contact the NRH Stakeholder and Patient Experience and Healthcare Data Manager, or you may wish to raise the complaint externally to the Irish Data Protection Commission.

Please help us to provide best care and service to you by informing us of any concerns that you may have at your earliest convenience.

For further information or to receive a copy of our Data Protection Policy Full Version, please ask a staff member or telephone the NRH (01) 235 5000 and ask to speak with our Data Protection Officer.

## 6.0 Contact Details

### 6.1 NRH Contact Information

NRH Data Protection Officer (DPO)  
Data Protection Officer  
National Rehabilitation Hospital  
Rochestown Avenue, Dun Laoghaire, Co Dublin, A96 RPN4, Ireland  
Email: [dpo@nrh.ie](mailto:dpo@nrh.ie)  
Telephone: +353 1 235 5000

Access to Records Officer (Subject Access Requests and Freedom of Information requests)  
National Rehabilitation Hospital  
Rochestown Avenue, Dun Laoghaire, Co Dublin, A96 RPN4, Ireland  
Email: [foi@nrh.ie](mailto:foi@nrh.ie)  
Telephone: +353 1 235 5000

Patient Experience and Healthcare Data Manager  
National Rehabilitation Hospital  
Rochestown Avenue, Dun Laoghaire, Co Dublin, A96 RPN4, Ireland  
Email: [patientexperience@nrh.ie](mailto:patientexperience@nrh.ie)  
Telephone: +353 1 235 5000

National Rehabilitation Hospital  
Address: Rochestown Avenue, Dun Laoghaire, Co Dublin, A96 RPN4, Ireland  
Email: [enquiries@nrh.ie](mailto:enquiries@nrh.ie)  
Telephone: +353 1 235 5000  
Website: [www.nrh.ie](http://www.nrh.ie)