

## Privacy statement

This privacy policy tells you how we use personal information within our processing of Hospital Episode Statistics (HES data, Copyright © 2022, Re-used with the permission of The Health and Social Care Information Centre, also known as NHS Digital. All rights reserved), for which Compufile Systems Ltd is a data controller.

Note: the privacy practices set forth in this privacy policy relate to our processing of HES only. If you link to other websites, please review the privacy policies posted at those sites.

### Collection of Information

CSL receive HES data directly from NHS Digital, following an annual application which is subject to a multi stage authorisation process. More information on this process is available [here](#).

The data we receive is pseudonymised. This means that although NHS Digital know the identity of individuals, they remove all identifying information (such as name, NHS number, doctor's name, date of birth and address) before providing the data to us, and each record is given a random unique number instead.

In the vast majority of cases the ability to identify individuals from the data is only available to the government organisation NHS Digital. CSL make no attempt to identify individuals from the records, and no secondary data sets are analysed alongside the HES data which may risk the anonymity of records.

### Categories of data

CSL process the following categories of data:

- Demographic
- Medical and health
- Physical characteristics

### How we use your data

All analyses are performed on aggregations of the data - rather than analysing individual records, we analyse groups of similar records to spot patterns, understand totals and benchmark the performance of organisations such as CCG and hospital trusts.

CSL is currently permitted by NHS Digital to utilise the data for the following purposes:

- To show aggregated patient pathways through the hospital system and provide an understanding of how patients are treated, and how treatment differs by key factors such as Trust, CCG or patient demographic
- To compare actual treatments with best practice and NICE guidelines and to contrast Trusts and CCGs with each other
- To quantify patient subsets to identify opportunities for cost savings or joint working initiatives and to monitor these initiatives once in place

Our advisory board incorporates independent advisors and oversees our use of these data. The minutes of our latest advisory board meeting can be found [here](#).

**No attempt is made to identify individuals from the data, and we never give third parties access to unprocessed, disaggregated data. Data is only used improve and inform the understanding of the NHS and their suppliers to enable them to improve the outcomes of patients and benefit the health and social care system.**

CSL does not use the data to run any automated decision making processes ("profiling").

### Legal basis for processing your data

Under the General Data Protection Regulation (GDPR), we are required to state the lawful basis for processing these data. Personal data is processed under the legal basis of legitimate interest (Article 6 (f)), whereby Compufile Systems Ltd is conducting its business as an information analysis agency and delivering benefits to the health and social care system of the UK, which in our assessment are not overridden by the rights and interests of the data subjects.

Special category data (relating to health) are processed for statistical purposes (Article 9 (j)).

### Data retention

We hold the latest five (5) years of data for inpatient and outpatient information.

### Unsubscribing

As the data is pseudonymised we are unable to identify individuals from the data, and so cannot remove data for specific individuals. If you do not wish to appear in this data set you should consult your GP, who can opt you out of various data sets held by NHS Digital. You can see more information on how do opt out of national data sets [here](#):

### Location of processing

All data is stored and processed within the UK, and no data are transferred outside of the UK.

### Distribution of Information

We do not share record level information with other organisations. Only aggregated and masked data (where small numbers are obfuscated to prevent identification) are shared with NHS organisations and their suppliers in the pursuit of the purposes set out above.

### Commitment to Data Security

Your personally identifiable information is kept secure. Only authorised employees, agents and contractors (who have agreed to keep information secure and confidential) have access to this information.

We take data security very seriously, and are ISO27001 certified.

### Privacy Contact Information

If you have any questions, concerns, or comments about our privacy policy you may contact us (the data controller) using the information below:

By email: [info@csl-uk.com](mailto:info@csl-uk.com)

By Phone: ++44 (0) 1483 528 300

By Mail: Data Protection Officer, CSL, The Sussex Barn, Peper Harow Park, Godalming, Surrey, GU8 6BQ

If you are not satisfied with the manner in which we handle your complaint, you complain to the Information Commissioner's Office (<https://ico.org.uk/make-a-complaint/>).

We reserve the right to make changes to this policy. Any changes to this policy will be posted.

**Version 1.9 – Last reviewed 30<sup>th</sup> June 2022**