



NIHR Privacy Policy

Document Control Information	
Title:	NIHR Privacy Policy
Version:	1.0
Author:	Alan Barcroft
Date:	24/10/2016
Approval Required:	SRE Information Manager SRE Dep. Director, Department of Health NIHR Standards & Design Authority NIHR Information Strategy Board
Approved by:	Justin Riordan-Jones Peter Knight NIHR SDA Meeting (27/09/2016) NIHR Information Strategy Board (07/09/2016)
Review frequency:	Annually
Next review date:	01/11/2017

NIHR privacy policy: data controller responsibilities

The Department of Health is the Data Controller for NIHR under the Data Protection Act.

NIHR privacy policy: purpose

This privacy policy sets out how the National Institute for Health Research (NIHR) uses and protects any information - including your personal information - which the NIHR collects and receives when you use any of its websites, systems or services.

The NIHR may change this policy from time to time by updating this document. You may check the latest document content at any time by visiting the [privacy policy](#) on the NIHR website at <http://www.nihr.ac.uk/privacy-policy.htm>. The latest version of this policy will be presented by reference or link from all relevant NIHR websites, systems and services.

NIHR privacy policy: scope

This policy is effective from 21/10/2016

This privacy policy is applicable to websites, systems and services provided as part of the corporate National Institute for Health Research (NIHR) representing the set of organisations that are contracted to the Department of Health as managing agents to deliver the NIHR and referred to as Corporate NIHR. This includes responsible units or services that form part of NIHR such as NIHR infrastructure.

Who we are

The NIHR is funded through the [Department of Health](#) to improve the health and wealth of the nation through research. It is a large, multi-faceted and nationally distributed virtual organisation. Together, NIHR people, facilities and systems represent the most integrated clinical research system in the world, driving research from bench to bedside for the benefit of patients and the economy.

The NIHR is not a legal entity; it consists of a number of managing agents that are contracted to the Department of Health to provide NIHR by advising on, recommending, organising and administering the commissioning of research programmes, infrastructure, training and patient and public involvement. For context, as of 01/06/2015, the following specific third party contracted units and services form the NIHR:

- NIHR managing agents also known “Coordinating Centres”
 - NIHR Central Commissioning Facility (CCF) – supports the commissioning of research programmes and infrastructure and their responsible units / services
 - Clinical Research Network Coordinating Centre (CRNCC) – establishes infrastructure, training and support and their responsible units / services

- o NIHR Evaluation, Studies and Trials Coordinating Centre (NETSCC) – supports the commissioning of research programmes
- o NIHR Trainees Coordinating Centre (TCC) – supports training awards to researchers and institutions
- o INVOLVE - supports public involvement in NHS, public health and social care research
- NIHR-wide Information and Communication Technology Services
 - o The NIHR Hub (Corporate IT services) – including email, document storage and sharing and other collaboration and productivity tools including a corporate directory.
 - o CloudLock – a security layer for Hub services
 - o The NIHR website and associated services
 - o The UK Clinical Trials Gateway – provides easy to understand information about trials running in the UK
 - o Amazon Web Services – hosting a number of applications
 - o ServiceNow – a helpdesk service providing support for NIHR facilities e.g. Hub and Website

This privacy policy is applicable to third parties who are contracted to act on behalf of the NIHR.

Further information is available from the NIHR website at <http://www.nihr.ac.uk/>

NIHR privacy policy: how we use your information

The NIHR is committed to ensuring that your privacy is protected.

Any information you provide to NIHR will only be used in accordance with this privacy policy.

What we collect

We may collect the following information:

- For formal interactions with NIHR – such as applications for funding - we will increasingly ask researchers for an ORCID^{®1} identifier as a consistent and universal identifier of a researcher across NIHR, and beyond. This will help us (and other research bodies) to recognise you as the same individual and will provide opportunities to remove duplication of your effort in recording information more than once.
- name, email address and organisational unit – these are collected to allow you to login and access NIHR services

¹ ORCID is a registered trademark of ORCID, Inc.

- Some services may optionally ask for additional data such as date of birth in order to fully participate (e.g. the Google+ service in NIHR Hub). You have full choice over your participation - and control over the disclosure of this information through the application.
- You may also provide additional information including contact details and job title; associations with organisations and institutions and your association with various NIHR activities e.g. applications, grants, awards, studies, training activities projects and programmes. Whilst this is not mandatory it will help you achieve more from the corporate systems and services.
- For applicants for funding we may collect additional sensitive data relating to equality and diversity (such as ethnicity). Where we do this it will be through a dedicated Equality and Diversity Reporting System and we will store the information separately and encrypted to maintain anonymity.

The information we collect may vary depending on the nature of your interaction with NIHR. However, the way we protect your information is always within the terms of this policy.

Why we collect the information

Information is collected for the administration and commissioning of NIHR research programmes faculty and infrastructure and any appropriate legislation.

What we do with the information we gather

We require this information for the following reasons:

- NIHR internal administration of NIHR websites, systems and services and users' access rights and privileges in order to effectively manage those systems and services and to provide appropriate privacy and confidentiality protection.
- Administration and management of the corporate NIHR including collecting, collating, analysing and interpreting information and insights for the effective and efficient management of NIHR, which may include:
 - Sharing information - including personal identifiers - with the Department of Health, other NIHR managing agents and contracted third party suppliers and agents. For example, for
 - the registration of funding applications
 - the operation of awards/grants processing and management information systems
 - the acquisition of UK and/or international peer reviewer comments on proposals and reports
 - the preparation of material for use by reviewers, experts, referees and review panels
 - response to reviewer comments
 - payments made to host institutions

- research and statistical analysis using anonymised² data
 - analysis of the collective activities and outcomes of NIHR
- o Sharing information – including personal identifiers – with authorised external services that collect and collate further information on research outputs, or provide researcher identification in order to provide a more integrated service to users and funders e.g. researchfish^{®3}, Europe PubMed Central (Europe PMC) & ORCID[®]
 - o Collating information about the different interactions that you have with NIHR across its constituent parts and over time
- Targeted communications with selected groups of individuals for authorised NIHR business purposes e.g. researchers (applicants), reviewers, panel members and others involved in the research management process.
 - o The nature of communications will vary according to the role or roles that you adopt, for example
 - For reviewers: your review of proposals
 - For applicants:
 - the registration of your application
 - your response to reviewer comments
 - We will use equality and diversity data in an anonymised form to monitor our compliance with equality and diversity objectives.
 - We will publish identifiable information about lead investigators and personal award holders in receipt of NIHR Funding.

Any specific terms and conditions relating to specific websites, services or systems will be communicated to you in the specific context, for example through a user agreement, but will remain consistent with this policy. User agreements are an important part of protecting privacy by placing behavioural expectations and obligations on all users of a service. Adherence to a user agreement will normally be established as part of registering to use a website, system or service, but casual use of websites may not require a formal agreement. Examples of user agreements would be:

² in accordance with the Information Commissioner's Office code "Anonymisation: managing data protection risk code of practice"

³ researchfish is a registered trademark of Researchfish Ltd.

Context	User Agreement / Terms and Conditions
NIHR Hub	The Hub - Policy Requirements and User Agreement
NIHR Website	Terms and Conditions
NETSCC Management Information System (MIS)	Terms and Conditions
CCF Research Management System (RMS) "CC Grant Tracker"	CCGT Terms & Conditions August 2012
TCC Awards Management System (TCCi) "CC Grant Tracker"	Terms & Conditions V2 May 2015
UK Clinical Trials Gateway	The UK Clinical Trials Gateway Privacy Policy (with respect to volunteer information)
Join Dementia Research	Privacy Notice / Cookies Policy

NIHR may communicate your information to third parties who are authorised and contracted to provide NIHR services. Any such third parties **must** handle your information in compliance with this privacy policy.

The security and integrity of NIHR systems are of paramount importance to the NIHR. Where systems have the potential to transfer data outside of the European Economic Area NIHR ensures that any such transfers are covered by relevant supplementary controls in line with advice from the Information Commissioner's Office.

Cookies and Log Files

We use cookies on NIHR websites to monitor use of our websites, use of web pages and to tailor the website operation to your needs and preferences. More information is available on the specific use of cookies in the [NIHR Cookies policy](#) on the NIHR website and on other NIHR websites with specific purposes (such as the UK Clinical Trials Gateway and Join Dementia Research).

When you use the Internet, you are assigned a unique address, known as an IP address. We use IP addresses to analyse trends, to administer the websites, track users' movements through the websites, and gather statistical information. IP addresses are not linked to personally identifiable information.

How long will we keep your data

We will keep your data retain your information for varying amounts of time depending on the nature of interaction with our services:

- We only store data that is necessary for a specific purposes
- We will not store your data for longer than is necessary
- Your data will be securely deleted when no longer needed for the purpose(s)

Accuracy

NIHR is committed to maintaining accurate records. Your information may be held in a number of locations across NIHR due to the dispersed nature of the NIHR. The most efficient way of verifying or amending your personal information may be to contact the managing agent operating the service or the service administrator. Each website, system or service will provide a mechanism for doing this. Alternatively, you may contact the data controller directly – see under [Protecting your personal information](#).

NIHR encourages the use of an ORCID identifier as a consistent and universal identifier of an individual researcher. Use of this identifier will facilitate NIHR in recognising you as the same individual and maintaining accurate, integrated and consistent records.

Security and Confidentiality

We are committed to ensuring that your information is secure. We use leading technologies and encryption software to safeguard your data, and maintain strict security standards to prevent any unauthorised access to it. However, given that transmitting information over the internet cannot be completely secure, we can't guarantee the security of your data in transit.

Links to other websites

Our services may contain links to other websites of interest outside the NIHR. This privacy policy only applies to NIHR websites, systems and services, and doesn't cover other websites and services that we may link to. You should exercise caution and look at the privacy statement applicable to the website/service in question.

Protecting your personal information

The Department of Health and the NIHR are committed to protecting privacy, and we are legally required to process all personal information in accordance with the Data Protection Act 1998 (DPA) and the data protection principles.

The Department of Health is the Data Controller under the DPA for activities undertaken by the NIHR and third parties contracted to provide services to NIHR

Applicants for funding should be aware that information collected in applications will be shared with other Department of Health / NIHR bodies for the purposes described above. See "[What we do with the information we gather](#)".

NIHR use of personal information operates under, and is compliant with, the Department of Health “Personal information charter”. More information can be found using the found on the [relevant pages](https://www.gov.uk/government/organisations/department-of-health/about/personal-information-charter) in the Department of Health section of the GOV.UK website: <https://www.gov.uk/government/organisations/department-of-health/about/personal-information-charter>

We will not sell your personal information. We will not disclose your personal information to third parties outside of the NIHR unless we have your explicit permission, or are required by law to do so.

You have the “right of subject access” under the DPA and may request details of personal data which we hold about you. If you would like to request a copy of your personal data or if you have any questions about the NIHR’s privacy policy, please write to:

SRE Information Manager
Department of Health
Room 132
Richmond House
Whitehall
London
SW1A 2NS

Or contact us by email at: subject-access@nihr.ac.uk

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

Version History			
Version	Date	Summary of Changes	Author
1.0	21/10/2016	Live version	Alan Barcroft