**Privacy Notice: Customer/SocialOptic Online Portal:**

**Data Controller:**

UCLH is the data controller and SocialOptic the data processor acting under our instruction.

**What personal data we collect:**

The surveys, consultations or forms may collect some or all of the following personal data: name, email address, mobile number, telephone number, postcode, ethnicity, main spoken language, health information related to the musculoskeletal symptoms, and the condition that you have been referred for, your current quality of life including your mobility, ability to look after yourself and undertake usual activities, any pain or discomfort you experience.

**How we use your data:**

Your personal data will be received by UCLH as the data controller. Your email address will be used to send you an invitation to the survey, and reminder emails. Responses will be anonymised before reporting, and minimum response thresholds are applied to further protect your anonymity.

With your agreement, your answers could also help a national project to understand and improve musculoskeletal care. The National MSK Audit and research database is being led by Professor Jonathan Hill at Keele University. Agreeing to share your data (i.e. your answers) is optional and will not affect your clinical care.

To find out more about what happens to your data if you agree, please read the National MSK Audit and Research Database Privacy Statement [privacy-statement-v-1-06Apr2023.pdf](https://www.keele.ac.uk/media/k-web/k-research/nationalmskaudit/privacy-statement-v-1-06Apr2023.pdf).

**Legal basis for processing personal data:**

Article 6 of the UK General Data Protection Regulation (UK GDPR):

(e) 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 controller

Article 9 of the UK General Data Protection Regulation (UK GDPR):

Article 9(2)(a) – the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Article 9(2)(h) – Necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.

**Data Processors and other recipients of personal data:**

SocialOptic is the data processor and will only share data with UCLH.

National MSK Audit and Research Database

Should you choose to share your answers with the National MSK Audit & Research Database, the

information collected is anonymised and stored in a research database to help researchers understand how MSK conditions affect people, how treatments help people, and to understand and improve care provision for people in the future.

Information you enter to the patient survey system will be visible to your treating clinical team. In addition, the research team at Keele University will be able to see your information but with your personal identifiable information removed except for a unique patient identifier (your NHS number), your postcode, and your date of birth. They may use your NHS number to match your survey data to other NHS databases to provide more information about your health.

The team at Keele University will then create a new database with all personal and identifiable data removed. The process of making this new dataset fully anonymous includes:

* All patient identifiers except for a unique case id will be removed. A linkage key will be stored in a different location to the original dataset but will never be shared.
* Postcode will be converted into an index of multiple deprivation rank, and the original postcode removed.
* Date of birth will be converted to age and the date removed.

Keele University is responsible for the manner in which your data are processed. The information you enter is stored in a digital format only. Information is held in an encrypted format in a secure Microsoft server. Keele University processes the data, using a secure cloud-based data storage solution within MicrosoftSharePoint at Keele University. All data repositories are encrypted, and password protected. All people with access to the data sign confidentiality agreements and are trained in the responsibilities of data protection. The data will then be shared with an additional data processor (the West Midlands Secure Data

Environment Team based at University Hospitals Birmingham (NHS based)). Once the data is transferred to the West Midlands Secure Data Environment the personal data at Keele will be deleted. Data within the West Midlands Secure Data Environment will be held in a secure environment, where only the Data Custodian and assigned personnel will have access to the data. No data will be shared outside the environment area and processes will be put in place to ensure that only relevant individuals will have access to personal data and that this is kept separately to the anonymised research database.

**International data transfers and storage location:**

As standard we do not transfer your personal data outside the United Kingdom. SocialOptic uses UK-based servers, and all data processing takes place within the UK.

**Retention and disposal policy:**

Personal data will be stored during the field period of the survey and for the subsequent analysis. Following this, all data gathered (including personal data) will be retained for 8 years. Once this time has elapsed the data will be deleted.

**How we keep your data secure:**

SocialOptic is certified under industry standard cyber security credentials (Cyber Essentials and IASME information assurance standards) as well as audits by financial services and government organisations. SocialOptic has a data security policy, data governance policy, business continuity plan and incident management process which are regularly reviewed. These policies cover patch management, testing, audit and the full data life cycle.

Each customer instance of SurveyOptic operates in its own separate, virtualised environment, ensuring the highest levels of data confidentiality. All data is held within UK-based data centres, with a primary data centre and mirroring to a secondary UK data centre, with a tertiary stand-by data centre for reliance, availability, and disaster recovery. All data centres are ISO 27001 certified, with independently verified security accreditations covering physical access control and logical security. All data is encrypted during transfer and storage and is automatically backed up in real time. Survey responses are journaled with a periodic roll up to minimise the chance of data loss, as well as periodic full snapshot backups providing an additional level of protection and recovery.

**Your rights as a data subject:**

By law, data subjects have a number of rights and this processing does not take away or reduce these rights under the UK General Data Protection Regulation and the UK Data Protection Act 2018 applies. These rights are:

1. The right to be informed - individuals have the right to know how their information is used and processed. You can find further information on how UCLH process your information by accessing the privacy policy at: <https://www.uclh.nhs.uk/cookies-privacy>.

The right to get copies of information – individuals have the right to ask for a copy of any information about them that is used.

2. The right to get information corrected – individuals have the right to ask for any information held about them that they think is inaccurate, to be corrected

3. The right to limit how the information is used – individuals have the right to ask for any of the information held about them to be restricted, for example, if they think inaccurate information is being used.

4. The right to object to the information being used – individuals can ask for any information held about them to not be used. However, this is not an absolute right, and continued use of the information may be necessary, with individuals being advised if this is the case.

5. The right to get information deleted – this is not an absolute right, and continued use of the information may be necessary, with individuals being advised if this is the case.

Further information on actioning your rights can also be found in the UCLH privacy policy.

**Withdrawing consent**

If you consent to us using your information and you change your mind, you have the right to withdraw that consent at any time. You can do this by click on this link [https://uclh-nhs.surveyoptic.com/consent-withdrawal-mskhq](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fuclh-nhs.surveyoptic.com%2Fconsent-withdrawal-mskhq&data=05%7C02%7Cjasbir.channa%40nhs.net%7Cfe874c2f23f24c3fcf3708ddbd6282c4%7C37c354b285b047f5b22207b48d774ee3%7C0%7C1%7C638874953005157057%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=g%2BWz6WH0ahsi4MVHHqPTgTGCiXpuuXuIbys0mNWjhvQ%3D&reserved=0)

**Comments or complaints:**

Anyone unhappy or wishing to complain about how personal data is used as part of this programme, should contact [UCLH.IGQueries@nhs.net](mailto:UCLH.IGQueries@nhs.net) in the first instance or write to:

Data Protection Officer

1st Floor

Maple House

Tottenham Court Road

London

W1T 7NF.

Anyone who is still not satisfied can complain to the Information Commissioners Office. Their website address is [www.ico.org.uk](http://www.ico.org.uk) and their postal address is:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

**Changes to this policy**

This privacy notice is kept under regular review, and new versions will be available on our privacy notice page on our website. This privacy notice was last updated on 14/05/2025.