

3M UK PLC PRIVACY NOTICE

ON PERSONAL DATA RECEIVED FROM NHS DIGITAL

This 3M UK Plc. Privacy Notice shall provide you with the details on how personal data received from NHS Digital is processed by 3M UK Plc (“Privacy Notice”).

You can also find 3M Global privacy policy following the link:
https://www.3m.co.uk/3M/en_GB/companyuk/privacy-policy.

This Privacy Notice supplements 3M Global Privacy Policy for the specific processing activity identified above.

What personal data have 3M UK Plc received from NHS Digital?

3M UK Plc have licenced Hospital Episode Statistics (HES) data directly from NHS Digital following the appropriate application through their Data Access Request Service (DARS):
<https://digital.nhs.uk/services/data-access-request-service-dars>. This data contains non-identifiable data about patients and their associated admission and critical care episode as well as outpatient appointments at NHS hospitals in England. Whilst this data will, by its nature, include the records of children and vulnerable people it includes no fields classifiable by NHS Digital as Sensitive or Identifiable.

In respect of this data 3M UK Plc. is a data controller under the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Our UK headquarters are: 3M Centre, Cain Rd, Bracknell, RG12 8HT.

If you have any questions about this Privacy Notice, please contact 3M’s European Data Protection Officer at:

Attn. EU Data Protection Officer
3M Belgium, Hermeslaan 7, B-1831 Diegem, Belgium
E-mail: DPO_EU@mmm.com
Telephone: +32 2 7224594

For what purpose do we process personal data received from NHS Digital?

3M UK Plc. have licenced Hospital Episode Statistics (HES) data containing details of all Admissions, Critical Care Episodes and Outpatient appointments at NHS hospitals in England for implementing in the UK advanced grouping algorithms namely 3M All Patient Refined (APR)-Diagnostic Related Grouper (DRG)s and 3M Clinical Risk Grouper (CRG)s. This is done so as to enable the NHS to have access to enhanced data sets that will help them better plan and analyse:

- Quality and cost improvement;
- Outcomes and performance measurement;
- Prospective reimbursement;
- Comparative profiling;
- Clinical and operational redesign and improvement;
- Documentation and coding improvement;
- Financial and strategic planning;
- Evaluation of resource needs; and
- Provider/Commissioner negotiation for reimbursement that matches case mix complexity enhance.

What is our legal basis for processing personal data received from NHS Digital?

3M UK Plc are committed to improving the quality of care and outcomes for patients in the UK. To support that aim, 3M UK Plc processes personal data for the purposes of its legitimate interests under Article 6(1)(f) of the GDPR.

Although the licenced Hospital Episode Statistics (HES) data contains no field values classifiable by NHS Digital as sensitive or identifiable 3M recognises this does contain pseudonymised data and will therefore treat it as special category data which constitutes personal data under GDPR and the Data Protection Act 2018 and as such 3M UK Plc processes this special category personal data for the purposes of its legitimate interests under Articles 6(1)(f) and 9 (2)(j) of the GDPR.

The specific legitimate interest for which 3M processes personal data received from NHS Digital relate to grouping and classification methodologies, software and products being developed by 3M and offered to NHS trusts to improve population health in the UK. The data requested will be used as an enabler, it will not be included or in any way embedded within the resultant 3M software solutions and will not be provided in record level form to any third party or similarly onward transmitted.

A foundational building block for the implementation of population health management is risk stratification and segmentation. 3M CRGs are a clinically-based classification system for measuring a patient's burden of illness. Their purpose is to give a deeper insight into the clinical complexity of a given population, distinguishing between patients who may share the same diagnosis but at the same time differ widely in their severity of illness, overall health status and ultimately their projected use of healthcare resources etc.

3M UK Plc's work directly supports the NHS's role in identifying people's health needs and intervening appropriately to address them.

How long will we keep the personal data received from NHS Digital?

3M UK Plc commits to holding no more than 5 years' worth of personal (HES) data received from NHS Digital at a time.

Your individual rights.

Requests from patients: the data 3M UK Plc receives from NHS Digital is not obtained directly from patients but from hospital provider systems via the Secondary Uses Service (SUS), furthermore the data is pseudonymized in such a way that 3M UK Plc can no longer identify individual patients within the data set. As a result, it is not possible for 3M to process requests from patients related to a right to erasure, rectification, data portability, restriction of processing, or access to the personal data itself. Similarly, individuals are under no statutory or contractual obligation to provide their personal data to SUS.

3M UK Plc cannot and will not use the licenced Hospital Episode Statistics (HES) data for automated decision-making around individuals nor will 3M UK Plc carry out automated processing of the personal data to evaluate or profile individuals.

Other data subjects requests: requests are managed by 3M UK Plc in accordance with the process specified in our Global Privacy policy: https://www.3m.co.uk/3M/en_GB/company-uk/privacy-policy/#EUResidents

Your rights to lodge a complaint with a supervisory authority.

3M UK Plc will use its best efforts to address and settle any requests or complaints brought to its attention. In addition, you have the right to approach the competent data protection authority with requests or complaints.

This can be the supervisory authority in the country or federal state where you live.

The overall competent supervisory authority for 3M in Europe is:

Commission for the Protection of Privacy
Rue de la Presse 35, 1000 Brussels
Telephone: +32 (0)2 274 4800
E-mail: commission@privacycommission.be
Website: www.privacycommission.be