



## Fair Processing Statement – for registered SSNAP users

### Overview of the Sentinel Stroke National Audit Programme (SSNAP)

The Sentinel Stroke National Audit Programme (SSNAP) is the national stroke audit which measures the quality and organisation of stroke care in the NHS. It is the single source of stroke data in England, Wales, and Northern Ireland. The SSNAP team are located with the School of Population Health and Environmental Sciences at King's College London (KCL).

We are committed to protecting your privacy as a registered SSNAP user. This statement is made in the light of the requirements of the Data Protection Act 1998 and General Data Protection Regulations (GDPR) in order to alert you to the data processing practices which will govern the use of your data.

If you have any queries about this statement please contact:

Information Compliance Team  
Email: [info-compliance@kcl.ac.uk](mailto:info-compliance@kcl.ac.uk)

### Legal basis for holding your personal information

By submitting personal data in electronic form to this audit service and accepting the terms and conditions, you enter into contract with SSNAP that all personal information you submit may be processed in the manner and for the purposes necessary to conduct our services. These services are detailed below.

### How personal information is protected

There are security measures in place for all personal information that is collected, to protect against the loss or alteration of information under our control. SSNAP ensures that your personal details and information are managed confidentially and securely, and that members of staff only access the information they need in order to conduct their duties.

### Why we need to collect and use your data

The SSNAP team will use the data collected on the registration form to:

- Assign your role and permissions for using the webtool
- Provide you with a username and method of accepting our terms & conditions
- Clarify that you are permitted to access and/or enter data for the group/team(s) you have requested
- Undertake SSNAP's core activities.

SSNAP core activities include:

- using the email address provided to send you the terms and conditions of SSNAP
- If you are a lead or second lead contact, providing your contact details to other logged-in users of SSNAP so that essential communication can occur between teams
- If you are a lead contact, using your name in The SSNAP Collaboration
- Contacting you in the event of essential issues regarding data entry at your team which need to be rectified
- Contacting you with essential updates regarding SSNAP. This includes release of SSNAP results, deadlines for data entry and dataset changes.

When you email [ssnap@kcl.ac.uk](mailto:ssnap@kcl.ac.uk) or use the contact form on the website, your email address will be shared with our customer service software company (Zendesk) to ensure we respond efficiently to all queries.

### **Who we share your data with outside KCL**

In order to deliver this service, this data will be shared:

- with our web developer, in order to enable the creation of accounts on the webtool
- with our customer service software company (Zendesk)
- with other SSNAP users so that essential communication can occur between teams
- with our clinical leads of the programme if required
- Details for clinical lead contacts registered on SSNAP may be shared with NHSE including the CQC and appropriate bodies in Wales and N Ireland. This is largely dependent on audit results, particularly outlier status in mortality reporting.

This data will be retained in SSNAP to:

- maintain a record of your SSNAP activity
- deactivate your account after long periods of inactivity (4 months without logging in)
- delete your account after extended periods of inactivity, subject to organisational requirements.

### **What information is captured from public visitors to the website (not SSNAP users)?**

If you do nothing other than read pages or download information while using the SSNAP website, certain information about your visit will be captured. This information will not identify you, it relates to:

- The internet domain e.g. [www.organisation.co.uk](http://www.organisation.co.uk) and IP address from which you access the web site
- The type of browser, such as internet Explorer or Netscape, and operating system, such as Windows, that you use
- The date and time of your visit
- The pages you visit
- The address of the web site from which you linked to us (if applicable)
- The query activities which you process.

We use this information to make each visit more rewarding and to provide us with information to help improve our service. We do not know (and do not want to know) the identities of people who visit us in this way.

### **How we protect your data outside the territories covered by the GDPR**

All information managed by the SSNAP team is held and used within the UK. Your data is not shared outside the territories covered by the GDPR.

### **How long we keep your data and why**

SSNAP stores your information for as long as the audit programme is running. That is currently until 31 March 2021. This enables the team to monitor activity, maintain important contact with stroke service providers and undertake core SSNAP activities as outlined above. If a user does not login to the system for 4 months their account is temporarily disabled and they need to contact the helpdesk to reactivate their account. If a user does not login for 12 months their account will be permanently deleted by SSNAP, subject to organisational requirements.

### **Where we got your data from, if not you**

All user data that is held by SSNAP is collected through the user registration process which is completed by the users themselves. No additional data is sourced by any other means.

### **Your rights as a registered SSNAP user**

As a registered SSNAP user you have rights to the following:

*Access your data, request a copy of your data in standard format and/or update your information*

You have the right to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected. User details can be found and updated in the user profile section of the SSNAP webtool. Alternatively please email the SSNAP helpdesk at [ssnap@kcl.ac.uk](mailto:ssnap@kcl.ac.uk) to request that information is provided and/or updated.

*Restricting the use of your data, stopping your data being used, and/or deleting your data*

If you wish to restrict, stop and/or delete your data from the SSNAP database please inform us by contacting [ssnap@kcl.ac.uk](mailto:ssnap@kcl.ac.uk). We will then delete you from our records.

### **Where we use automated decision making and how this affects you**

Automated decision making is not used by SSNAP so user data is not impacted in this way.

### **Who makes the decisions about using your data, if not KCL**

Only KCL makes decisions about using your data

### **Who to contact at KCL and how to complain**

As a SSNAP user you have the right to complain about the use of your data by SSNAP. Should you have any concerns or queries about any of the above please contact the KCL data protection officer [info-compliance@kcl.ac.uk](mailto:info-compliance@kcl.ac.uk). If you are not satisfied with the service provided by KCL you have the right to complain to the Information Commissioners Office (ICO) <https://ico.org.uk/concerns/> or call their helpline on 0303 123 1113

### **Additional related information**

SSNAP has produced a privacy notice which provides information on how user information will be used. This is available when registering as a new user at <https://www.strokeaudit.org/Registration/Clinical-and-groups.aspx>.

There is also a wealth of information regarding the legal basis for collecting and using patient data by SSNAP. This is accessible on the patient and carer page on the SSNAP website, and in the SSNAP governance section:

<https://www.strokeaudit.org/PatientInfo.aspx>

<https://www.strokeaudit.org/SSNAP-Governance.aspx>

SSNAP reserves the right to amend this fair processing statement. If we do so, we will post notice of the change on our website and you will be deemed to have accepted such changes.