**Transparency Notice**

**How will we use Information about you?**

**Research Study Title: Periprosthetic femoral fractures: data, management and outcomes**

Imperial College London is the sponsor for this study and will act as the Joint-Controller with the National Joint Registry, the University of Manchester (for the TARN database) and the Royal College of Physicians (for the National Hip Fracture Audit) for this study. This means that we are responsible for looking after your information and using it appropriately. Imperial College London will keep your personal data for:

* ten years after the study has completed in relation to primary research data.

The study is expected to finish in December 2025.

For more information / confirmation regarding the end date please contact the study team, see ‘**WHERE CAN YOU FIND OUT MORE ABOUT HOW YOUR INFORMATION IS USED’** for contact information.

People who do not need to know who you are, which includes the study team, will not be able to see your name or contact details. Your data will have a unique study number instead.

We will keep all information about you safe and secure.

Once we have finished the study, we will keep some of the data so we can check the results. We will write our reports in a way that no-one can work out that you took part in the study.

**LEGAL BASIS**

As a university we use personally identifiable information to conduct research to improve health, care and services. As a publicly funded organisation, we have to ensure that it is in the public interest when we use personally identifiable information from people who have agreed to take part in research.  This means that when you agree to take part in a research study, we will use your data in the ways needed to conduct and analyse the research study. Our legal basis for using your information under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, is as follows:

• Imperial College London - “performance of a task carried out in the public interest”; Health and care research should serve the public interest, which means that we have to demonstrate that our research serves the interests of society as a whole. We do this by following the [UK Policy Framework for Health and Social Care Research](https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/uk-policy-framework-health-social-care-research/)

Where special category personal information is involved (most commonly health data, biometric data and genetic data, racial and ethnic data etc.), all organisations involved rely on “scientific or historical research purposes or statistical purposes.

**INTERNATIONAL TRANSFERS**

There may be a requirement to transfer information to countries outside the United Kingdom (for example, to a research partner, either within the European Economic Area (EEA) or to other countries outside the EEA. Where this information contains your personal data, Imperial College London will ensure that it is transferred in accordance with data protection legislation. If the data is transferred to a country which is not subject to a UK adequacy decision in respect of its data protection standards, Imperial College London will enter into a data sharing agreement with the recipient research partner that incorporates UK approved standard contractual clauses or utilise another transfer mechanism that safeguards how your personal data is processed.

**SHARING YOUR INFORMATION WITH OTHERS**

We will only share your personal data with certain third parties for the purposes referred to in this participant information sheet and by relying on the legal basis for processing your data as set out above.

* Other Imperial College London employees (including staff involved directly with the research study or as part of certain secondary activities which may include support functions, internal audits, etc.), Imperial College London agents, contractors and service providers (for example, suppliers of printing and mailing services, email communication services or web services, or suppliers who help us carry out any of the activities described above). Our third party service providers are required to enter into data processing agreements with us. We only permit them to process your personal data for specified purposes and in accordance with our policies.

**POTENTIAL USE OF STUDY DATA FOR FUTURE RESEARCH**

When you agree to take part in a research study, the information collected either as part of the study or in preparation for the study (such as contact details) may, if you consent, be provided to researchers running other research studies at Imperial College London and in other organisations, which may be universities or organisations involved in research in this country or abroad. Your information will only be used to conduct research in accordance with legislation including the GDPR and the [UK Policy Framework for Health and Social Care Research](https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/uk-policy-framework-health-social-care-research/).

This information will not identify you and will not be combined with other information in a way that could identify you, used against you or used to make decisions about you.

**COMMERCIALISATION**

Data from the study may also be provided to organisations not named in this participant information sheet, e.g. commercial organisations or non-commercial organisations, for the purposes of undertaking the current study, future research studies or commercial purposes such as development by a company of a new test, product or treatment. We will ensure your name and any identifying details will NOT be given to these third parties. Instead you will be identified by a unique study number with any sample analysis having the potential to generate ‘personal data’.

Aggregated (combined) or anonymised data sets (all identifying information is removed) may also be created using your data (in a way which does not identify you individually) and be used for such research or commercial purposes where the purposes align to relevant legislation (including the GDPR) and wider aims of the study. Your data will not be shared with a commercial organisation for marketing purposes.

**WHAT ARE YOUR CHOICES ABOUT HOW YOUR INFORMATION IS USED?**

You can stop being part of the study at any time, without giving a reason, but we will keep information about you that we already have because some research using your data may have already taken place and this cannot be undone.

* We need to manage your records in specific ways for the research to be reliable. This means that we may not be able to let you see or change the data we hold about you if this could affect the wider study or the accuracy of data collected.

**WHERE CAN YOU FIND OUT MORE ABOUT HOW YOUR INFORMATION IS USED**

You can find out more about how we use your information:

* by asking one of the research team
* by sending an email to m.aryaie@imperial.ac.uk, or
* by ringing us on 020 7589 5111, or
* by reading the following websites regarding each of the four databases:

The need to obtain individual consent for the analysis of all four databases is waived under section 251 of the NHS Act 2006, with provision for personal opt outs for research and planning:

The Trauma Audit and Research Network (TARN) has Section 251 approval from CAG to allow TARN to collect data without patient consent: see <https://www.tarn.ac.uk/Content.aspx?ca=2&c=3964>

The National Joint Registry (NJR) does ask for individual patient consent for data collection but also has Section 251 approval to collect data without approval if the consent status is 'unknown': see [https://www.njrcentre.org.uk/healthcare-providers/collecting-pati ent-consent/](https://www.njrcentre.org.uk/healthcare-providers/collecting-pati%20ent-consent/)

The National Hip Fracture Database (NHFD) is managed by the Royal College of Physicians, who have Section 251 approval (CAG reference: CAG 8-03(PR11)/2013: formerly ECC 3-04(s)/2011): see <https://www.nhfd.co.uk/20/hipfracturer.nsf/docs/about>

Access to Hospital Episodes Statistics (HES) is via NHS Digital, who apply opt-outs and release data to researchers via Section 251. See e.g. <https://digital.nhs.uk/services/data-access-request-service-dars/how-the-national-data-optout-affects-data-released-by-nhs-digital>

**COMPLAINT**

If you wish to raise a complaint about how we have handled your personal data, please contact the research team first by sending an email to m.aryaie@imperial.ac.uk, or by ringing us on 020 7589 5111.

Following our response, if you are not satisfied please contact Imperial College London’s Data Protection Officer via email at dpo@imperial.ac.uk, via telephone on 020 7594 3502 and/or via post at Imperial College London, Data Protection Officer, Faculty Building Level 4, London SW7 2AZ.

If you remain unsatisfied with our response or believe we are processing your personal data in a way that is not lawful you can complain to the Information Commissioner’s Office (ICO)- via [www.ico.org.uk](http://www.ico.org.uk). Please note the ICO does recommend that you seek to resolve matters with the data controller (us) first before involving them.