# Imperial College London

# PARTICIPANT PRIVACY INFORMATION



(Multinational Anal Squamous Cell Carcinoma Registry and Audit)

IRAS: 335443

## **HOW WILL WE USE INFORMATION ABOUT YOU?**

Imperial College London is the sponsor for this study and will act as the Data Controller 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:

- 10 years after the study has finished in relation to data subject consent forms.
- 10 years after the study has completed in relation to primary research data.

The study is expected to finish in January 2034.

Further information on Imperial College London's retention periods and data protection may be found at:

https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/

We will need to use information from your medical records for this research project.

This information will include your:

- Health services identifying number (for example hospital number)
- Age
- Gender
- Information about your medical conditions and medications.
- If you are HIV positive, will also collect your last viral load and CD4 counts.
- If you have attended screening for anal SIL, we will collect information about this and any previous treatment for SIL that you have received.
- If you have Anal Squamous Cell Carcinoma, we will collect data on which treatments you receive and the pathological staging of your cancer.
- We will also include long term follow up outcomes such as a new diagnosis of Anal Squamous Cell Carcinoma or disease recurrence as well as survival outcomes.

People within the College and study team will use this information to do the research or to check your records to make sure that research is being done properly and the information held (such as contact) details is accurate.

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.

As a university we use personally identifiable information to conduct research to improve health, care, and services. As a publicly funded organisation, we must 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 must demonstrate that our research serves the interests of society. We do this by following the <a href="UK Policy Framework for Health and Social Care Research">UK Policy Framework for Health and Social Care Research</a>.

Where special category personal information is involved (most commonly health data, biometric data and genetic data, racial and ethnic data etc.), Imperial College London) relies 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, ensuring accuracy of contact details 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 <a href="UK Policy Framework">UK Policy Framework</a> for Health and 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 <u>organisations not named in this participant information sheet</u>, 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 data 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.

- If follow up data will be collected after withdrawal: If you choose to stop taking part in the study, we would like to continue collecting information about your health from central your hospital records. If you do not want this to happen, tell us and we will stop. This will not affect any healthcare or support you may be receiving separately.
- We need to manage your records in specific ways for the research to be reliable. This means that we won't 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:

- at www.hra.nhs.uk/information-about-patients/
- in the Patient Information Sheet
- by asking one of the research team
- by sending an email to chelwest.mascararegistry@nhs.net

#### **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 chelwest.mascararegistry@nhs.net, or by ringing us on <u>020</u> 3315 8000.

Following our response, if you are not satisfied please contact Imperial College London's Data Protection Officer via email at <a href="mailto:dpo@imperial.ac.uk">dpo@imperial.ac.uk</a>, 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 <a href="https://www.ico.org.uk">www.ico.org.uk</a>. Please note the ICO does recommend that you seek to resolve matters with the data controller (us) first before involving them.