

Regional privacy statement layout for the GGD Health Monitor 2022

Introduction

The GGD Health Monitor 2022 will be carried out between 9 September and 9 December 2022 among adults (18–64) and the elderly (65+). This monitor is being carried out to assess the impacts of the coronavirus pandemic. The GGDs (Regional Public Health Services) have worked together with GGD GHOR Nederland (the national association of GGDs and GHOR-offices), the National Institute for Public Health and the Environment (RIVM) and Statistics Netherlands (CBS) to develop the GGD Health Monitor 2022. The GGD Health Monitor 2022 will be carried out in the same manner and at the same time of year by every GGD in the Netherlands. The GGDs are conducting this study on behalf of the Dutch Ministry of Health, Welfare and Sport (VWS).

In this privacy statement, GGD Noord- en Oost-Gelderland describes how it will handle the sensitive and non-sensitive personal data provided in the GGD Health Monitor 2022 questionnaires and the resulting research results, and the measures that it will take to ensure that these are properly protected.

Why does the GGD Health Monitor 2022 take place?

Besides the four-yearly monitor, the Dutch Public Health Act (Wet publieke gezondheid, Wpg) also sets out an obligation to conduct a health outcome assessment after a disaster (Article 2, paragraph 2a of the Wpg and Article 2, section 1 of the 'Besluit publieke gezondheid' [Public Health judgement]). As the COVID-19 pandemic has affected societies worldwide and threatens public health in both the short and the long term, it is therefore defined as a disaster.

Met opmerkingen [LBvd1]: Dit staat iets anders in het format

Purpose of the GGD Health Monitor 2022

The GGD Health Monitor 2022, which specifically addresses adults and the elderly, has the following aims:

- to obtain insight into the health situation of the population and to monitor this health situation in time;
- to conduct health research after a disaster, in this case the coronavirus pandemic;
- to develop local and national policy to promote public health.

How is the GGD Health Monitor 2022 carried out?

To achieve the aims described above, GGD Noord- en Oost-Gelderland will use an online questionnaire to collect information from individuals. Not every resident aged 18 and over will be invited to take part in the monitor: CBS will draw a random sample for the GGD Health Monitor 2022 for the GGDs. This means that adults (18–64) and the elderly (65+) who live in a municipality (or particular neighbourhood) will be selected at random (individuals with secret addresses will not be

included in this). GGD Noord- en Oost-Gelderland has commissioned I&O Research to send the invitations to participate in the study and to collect the completed questionnaires, for which CBS will send the names and addresses to I&O Research.

In addition, the personal data from the random sample will be used to send VVV Gift Cards to prize winners at the end of the fieldwork period. VVV Gift Cards will be raffled among all respondents who have completed the questionnaire digitally or in writing. A respondent can indicate whether they want to be eligible for this prize draw. Only the addresses of the winners of the raffle will be selected from the sample file in order to be able to send the VVV Gift Cards.

Participation in the GGD Health Monitor 2022

Participation in the GGD Health Monitor 2022 is entirely voluntary. By completing the questionnaire, you agree to participate in the GGD Health Monitor 2022. This will be clearly indicated at the start of the questionnaire. Note that you do not have to answer a certain question if you do not want to, and you may stop filling in the questionnaire at any time. Your answers will be processed confidentially, will be stored safely and will not be shared with any party that is not named in this privacy statement.

Will GGD Noord- en Oost-Gelderland process my personal data and, if so, which?

The aim of the GGD Health Monitor 2022 is not to process sensitive and identifiable personal data, but to obtain an overview of the health situation in the Netherlands. While the GGDs and RIVM will not be able to directly identify which individual has provided which answers, a combination of provided answers may make this possible in highly exceptional circumstances. CBS, which is also participating in this study, will be able to use the data to directly identify individuals, but will only do this for purposes that are permitted by the CBS Act. CBS will couple the data from the questionnaire with CBS data based on a serial number. They do this, among other things, to weigh the results. By doing so, population groups with a relatively low response rate will weigh more than responses from population groups with a higher response rate. This will allow the final results to provide an overview of the health status of all population groups.

Every attempt will be made to minimise the potential identifiability of individuals. However, as there is a possibility that an individual could be identified indirectly by the GGDs and RIVM, and because CBS combines personal data based on a code, a data protection impact assessment (DPIA) has been conducted for the study.

The questionnaire covers the following topics:

- Personal data: sex, year of birth, household composition, level of education, work situation, financial situation, volunteer work;
- Sensitive personal data: general state of health, chronic disorders, well-being, mental health, height and weight, smoking habits, alcohol use, exercise, provision of informal care, social support, noise nuisance, odour nuisance, indoor climate, social contacts, social activities and impact of COVID-19. Only for the elderly: intimacy and digital skills.

How will GGD Noord- en Oost-Gelderland use the information provided in the questionnaires?

GGD Noord- en Oost-Gelderland will produce reports for municipalities and other parties based on the answers provided. Measures will be taken to ensure that the information in these reports cannot be used to identify an individual, by reporting at the group level only. The purpose of these reports is to inform health policy.

The national partners RIVM and CBS may also use the data collected for the GGD Health Monitor 2022 for research and publication purposes. Here too, the final reports will only report data at the group level of analysis, so that it is not possible to directly identify individuals. GGD GHOR Nederland is only permitted to use an anonymised dataset for research and publication purposes, which it will receive from RIVM.

RIVM and CBS are both data controller for the processing of the personal data with which they work. They must therefore provide information about the processing operations which they carry out in regard to personal data.

Who will have access to the data collected for the GGD Health Monitor 2022?

Only employees of GGD Noord- en Oost-Gelderland who are responsible for processing the study data will have access to the data. The answers will be handled and processed in strict confidence.

RIVM and CBS will be sent the results of the completed questionnaires, excluding the specific local questions added by GGD Noord- en Oost-Gelderland. This is set out in agreements drawn up between the cooperating parties. GGD GHOR Nederland, the association of the GGDs, will process the personal data for the GGD's. GGD GHOR Nederland is responsible for cleaning of the datasets. In addition, GGD GHOR Nederland can receive a file without identifiable data, thus enabling the support of the GGD's in the analysis of the data at national level.

Third parties may carry out research using the national data files produced for the GGD Health Monitor 2022, but to do so they must first submit an application to <https://www.monitorgezondheid.nl/data-aanvraag>. The application will then be assessed by the *Registratiecommissie Gezondheidsmonitors* (Health Monitor Registration Committee), who will check that the application meets the required criteria. These criteria can be found on <https://www.monitorgezondheid.nl> under '*uitleg*' and '*criteria*'. Third parties who obtain authorisation to access the database and wish to carry out analyses using this data may only access the data through the CBS Remote Access (RA) environment, for which CBS-institutional authorisation is required.

How is the collected data secured?

The GGD, RIVM, GGD GHOR Nederland and CBS are committed to ensuring that privacy is respected at all times, and every attempt will be made to minimise the potential identifiability of individuals. Moreover, every party will implement the required technical and organisational measures to ensure that the completed questionnaires are securely stored. For example, secure programmes that require two-step verification will be used to send the data files. Furthermore, only those employees who are involved in the GGD Health Monitor 2022 will have access to the completed questionnaires. The researchers are bound to secrecy.

GGD Noord- en Oost-Gelderland has commissioned the market research agency I&O Research to distribute and collect the questionnaires and to provide temporary data storage. This external party is also bound by strict conditions regarding security measures and confidentiality. A processor agreement has been concluded with this party detailing these agreements.

How long will the data collected for the GGD Health Monitor 2022 be stored for?

The GGD Health Monitor 2022 also aims to monitor the health of adults and the elderly over a period of time, in order for trends and the effectiveness of health policy can be studied. This means that GGD Noord- en Oost Gelderland must also require access to the completed questionnaires in the future, so that it can achieve the aims described above and can continue to properly execute the tasks described. There is no legally set maximum period for storage of the final data files that are used for analysis. The raw file (on which no processing has been carried out) will be stored until the analyses have been completed and the results have been published. The published results are expected halfway 2023. This will enable revering older (raw) versions of the dataset in case errors are found in data cleaning. Names and addresses will be deleted three months after completion of the monitor.

What are my rights?

As a participant in the study, you have a number of rights regarding the processing of your data, as detailed below. For further information on these rights, please visit the Dutch Data Protection Authority website.

Right to information

You are entitled to clear information on what an organisation does with your personal data and why. This online privacy statement has been drawn up to comply with this. If you have any further questions, please refer to the information provided in the last section of this privacy statement. A written version of this privacy statement may be requested from I&O Research by sending an email to helpdeskGM@ioresearch.nl or calling 0800 0191 (7 days a week, 09.00 – 21.00).

Right of access and copies

You are entitled to access your data. Note however that a request to access your data is only possible in the data collection stage (field work) until 15 December 2022. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right of rectification

You have the right to have data that is incorrect, or that is no longer correct, rectified. Note however that a request for rectification is only possible in the data collection stage (field work) until 15 December 2022. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right of erasure

You may request that your personal data is erased. Note however that a request to erase your data is only possible in the data collection stage (field work) until 15 December 2022. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right to restrict processing

In certain cases (as stipulated in the GDPR), you may request that the processing of your data is restricted. This is only possible if the data is suspected to be incorrect. A request to restrict processing is only possible in the data collection stage (field work) until 15 December 2022. After this first phase, all directly identifiable data is deleted, which makes it impossible to retrieve individual data without first obtaining additional data from CBS.

Right of data portability

You have the right to receive your personal data in a digital (machine readable) format. A request for data portability is only possible in the data collection stage (fieldwork) until 15 December 2022. After this first phase, all directly identifiable data will be deleted, making it impossible to trace individual data without additional information from CBS.

Freedom of participation and right of objection

Participation in the GGD Health Monitor 2022 is entirely voluntary, and you may refuse to participate at any time, without being required to provide a reason. You also have a formal right to objection, which you may make use of if it is justified by the individual circumstances.

Who can I contact with questions?

If you have questions concerning your rights and how these may be exercised within the framework of this study you can contact I&O Research until 15 December 2022 via helpdeskGM@ioresearch.nl. You can also call 0800-0191 (available every day from 09:00 – 21:00). If you file a request regarding your rights, we require your login details.

If you would like to lodge a complaint, you may contact: Thijs Nijland, GGD data protection officer via fg@ggdnog.nl or 088-4433000.

Should you have any questions concerning the study or how GGD Noord- en Oost-Gelderland will handle your answers, you may contact the researchers via onderzoek@ggdnog.nl or 088-4433000.

If you disagree with the outcome of your complaint or request or the way in which your complaint or request was handled, you may submit a complaint to the Dutch Data Protection Authority. You can do this at the following website: <https://autoriteitpersoonsgegevens.nl/nl/voordat-u-een-klacht-indient>.

For more information on how GGD Noord- en Oost-Gelderland will handle your privacy, please refer to our general privacy statement: <https://www.ggdnog.nl/privacyverklaring>.

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