	Joint statement from NHS England and National Quality Improvement (inc. Clinical Audit) Network (N-QI-CAN) on use of Survey Monkey in Clinical Audit and other Quality Improvement methods and Patient identifiable Data (PID).
	Approved at N-QI-CAN March 2019

Further to recent queries raised on the N-QI-CAN forum in regards to using use of Survey Monkey in Clinical Audit and other Quality Improvement methods - I now have a statement from David Evans, Data Sharing and Privacy Projects Lead from NHS England on the matter - in particular surveys that contain Patient identifiable Data (PID) or Personal data*.

'Using Survey Monkey for arranging meetings where the amount of personal data involved is likely to be minimal should not cause any data protection concerns.

However Survey Monkey's processing of personal data takes place mainly in the USA and outside the UK and the EU. This means that information about identifiable or potentially identifiable patients or staff should not be recorded on Survey Monkey. This is because clear legal controls need to be in place where UK (and European) personal data is processed in the USA. However such controls are not in place to cover this use of Survey Monkey. Hence recording identifiable or potentially identifiable patient data on Survey Monkey is likely to be in breach of the General Data Protection Regulation (GDPR) and the linked Data Protection Act 2018'. End.

In summary - Survey monkey (SM) should not be used if Patient identifiable Data (PID) is being collected. If SM is being used for any clinical audit project or similar without PID then this is ok but the organisation coordinating the project should have data sharing / processing agreement in place with SM.

Regards

Carl Walker

N-QI-CAN Chair

* The definition of 'personal data' in the GDPR is more expansive and detailed than current data protection law. As well as applying to things that obviously identify an individual, such as name, address and date of birth, information such as a computer's IP address or genetic sequence data can also be considered personal data. These definitions reflect changes in technology, the capacity to link data to identify individuals and the way organisations collect information about people.

Link to further details: https://understandingpatientdata.org.uk/news/gdpr-and-patient-data