**[*DRAFTING NOTES ARE INCLUDED IN SQUARE BRACKETS IN BOLD ITALICS*]**

**[*The highlighted fields will need to be completed on a case by case basis. Depending on the nature of the study (i.e. whether personal data or anonymised data is being used) there is a choice of paragraphs at Sections B and C).*]**

**[*Personal data is any information relating to (1) an identified participant (e.g. you have their name) or (2) a participant who is identifiable (i.e. you hold data that could identify the individual by means reasonably likely to be used taking into factors such as cost, time, available technology. A correctly implemented code system should not result in the participant being identifiable and, in such cases, the data would not qualify as personal data).*]**

**[IMPERIAL COLLEGE LETTERHEAD]**

**PARTICIPANT PRIVACY INFORMATION**

**Research Study Title:** [insert title]

[insert ID if applicable]

Imperial College Londonis the sponsor for this study based in [the United Kingdom]. We will be using information from [you and/or your records] in order to undertake 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 properly. Imperial College London will keep identifiable information about you for:

* [insert number of years] after the study has finished in relation to data subject consent forms.
* [insert number of years] after the study has completed in relation to primary research data.

Further information on Imperial College London’s retention periods may be found at https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf.

A link to Imperial College London’s data protection webpage may be found at https://www.imperial.ac.uk/admin-services/legal-services-office/data-protection/ but this is the notice most applicable to the information provided by participants and therefore takes precedence for all purposes described hereunder.

**THE PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT**

***[Choose as applicable Section A, Section B, Section C and/or Section D]***

**[A] [*Use where the College is directly collecting personal information from participants in the research project*]**

Information collected by us

In the course of the research study Imperial College London will collect the following personal information when you provide it to us [online/in person/any other ways of collecting personal data directly from participants]:

* [insert as applicable e.g. contact and communications information, including:
  + your contact details (including email address(es), telephone numbers and postal address(es));
  + records of communications and interactions we have had with you;]
* [biographical, educational and social information, including:
  + your name, title, gender, nationality and date of birth;
  + [insert any other data that falls within this category];]
* [insert any other category].

[We will also collect some special categories of data [and information about criminal convictions and offences – unlikely in the research context but included as an option for completeness], including information concerning:

* [your health, medical conditions and disabilities];
* [criminal convictions and offences].]

**[B] [*Use where participants are providing personal data for the primary purpose of research to a third party and that third party passes the data to the College for its research project. Consider also if the third party is in the best position to provide the privacy notice to the participant on behalf of the College at the point of collection*]**

Information collected from other sources

[Name of third party organisation] will collect information from [you and/or your records] for this research study in accordance with our instructions.

**[*USE EITHER Paragraph B1 or Paragraph B2*:]**

**[B1] [*If a code system is used and the key is kept confidential and not disclosed to Imperial College London (i.e. anonymised data is being used)***]

[Name of third party organisation] will keep your name and contact details [add other identifiers collected by the third party organisation if applicable] confidential and will not pass this information to Imperial College London. [Name of third party organisation] will use this information as needed, to contact you about the research study, and make sure that relevant information about the study is recorded, and to oversee the quality of the study. Certain individuals from Imperial College London and regulatory organisations may look at your research records to check the accuracy of the research study. Imperial College London will only receive information without any identifying information. The people who analyse the information will not be able to identify you and will not be able to find out your name [, include any other identifiers added above] or contact details.

[Name of third party organisation] will keep identifiable information about you from this study for [insert] years after the study has finished.

***[The third party organisation’s retention period should be checked and amended as appropriate]***

**[OR:]**

**[B2] [*If no code system is used and so the College will receive personal data as opposed to anonymous data via the third party. Note that participant contact information provided to the College should only be provided to staff who need it and should not be passed to researchers who are conducting analysis and don’t necessarily need participant contact information*]**

[Name of third party organisation] will use your name and contact details [add other identifiers collected by the third party organisation if applicable] to contact you about the research study, and make sure that relevant information about the study is recorded, and to oversee the quality of the study. Individuals from Imperial College London and regulatory organisations may look at your research records to check the accuracy of the research study. [Name of third party organisation] will pass these details to Imperial College London along with the information collected from [you and/or your records]. The only people in Imperial College London who will have access to information that identifies you will be people who need to contact you to [insert reason if applicable] [or] audit the data collection process. The people who analyse the information will not be able to identify you and will not be able to find out your name, [, include any other identifiers added above] or contact details.

[Name of third party organisation] will keep identifiable information about you from this study for [20] years after the study has finished.

**[*The third party organisation’s retention period should be checked and the period above amended as appropriate*]**

**[C] [*Where participants are providing information indirectly e.g. being obtained from previously collected records or database*]**

Information collected from other sources

**[*USE EITHER Paragraph C1 or Paragraph C2*:]**

**[C1] [*If a code system is used and the key is kept confidential and not disclosed to the College (i.e. anonymised data is being used)*]**

Imperial College London will collect information about you for [research/this research study] from [source]. [Source] will not provide any identifying information about you to Imperial College London. We will use this information to [insert the purpose of the research/research study].

**[*OR:*]**

**[C2] [*If the College will receive personal data (i.e. not anonymised)*]**

Imperial College London will collect information about you for [research/ this research study] from [source]. This information will include [your name, contact details, *add any other types of personal data collected*]. [Insert any categories of such information as are sensitive personal data][ [is/are] regarded as a special category of information. We will use this information to [insert the purpose of the research/research study].

**[D] *If applicable use this wording where data is intended to or likely to be used for future research*]**

When you agree to take part in a research study, the information about you collected for the purposes of the research study may be provided to researchers running other research studies in this organisation and in other organisations. These organisations may be universities, NHS organisations or companies involved in research in this country or abroad. Your information will only be used by organisations and researchers to conduct research in accordance with recognised national or international good practice guidelines and in accordance with research ethics.

***[USE EITHER Paragraph D1 or D2]***

**[D1] [*Use where no personal data is held in the research study data set and it won’t be combined with other data sets in a way that could identify the participant (i.e. it will remain anonymised data)*]**

This information will not identify you and will not be combined with other information in a way that could identify you. The information will only be used for the purpose of [insert type] research, and cannot be used to contact you or to affect you. It will not be used to make decisions about future services available to you, such as insurance.

***[OR:]***

**[D2] [*Use where personal data is held (i.e. the participant is identified or identifiable) in the research study data set – ‘identifiable’ means the individual can be identified by means reasonably likely to be used taking into factors such as cost, time, available technology)*]**

Your information could be used for research in any aspect of [insert general area of research], and could be combined with information about you from other sources held by researchers, the NHS or government.

Where this information could identify you, the information will be held securely with strict arrangements about who can access the information. The information will only be used for the purpose of [insert type] research, or to contact you about future opportunities to participate in research. It will not be used to make decisions about future services available to you, such as insurance.

Where there is a risk that you can be identified your data will only be used in research that has been independently reviewed by an ethics committee.

**YOUR RIGHTS**

Your usual statutory rights to access, change or move your information are limited, because of exceptions applicable to some types of research, and also because we need to manage your information in specific, lawful ways in order for the research to be reliable and accurate. If you withdraw from the study, we will keep the information about you that we have already obtained. To safeguard your rights, we will use the minimum personally-identifiable information possible.

**LEGAL BASIS**

As a university we use personal information to conduct research that will [either] be in the public interest, [or the legitimate interests of the College].

As a publicly-funded organisation we have to ensure that when we use personally-identifiable information from people who have agreed to take part in research, it is [either] in the public interest, [or that our legitimate purposes are both properly notified to you and are not overridden by your rights].

We will conduct scientific research in compliance with the law and the recommendations and guidance published by the UK Information Commissioners Office (ICO). [This will follow similar rules to health and care research but may not meet the definition of the College’s public interest task. In such cases we will be holding and using your data for what are deemed our “legitimate interests”. ]

When you agree to take part in a research study, the information you provide may be shared with researchers running other research studies in this organisation and in other organisations. These organisations may be universities or companies involved in similar research in this country or abroad. However, we will take such steps as are ethical, appropriate, and in line with the law and ICO Guidance, to minimise the personal aspects of the data in both processing and sharing it insofar as the research allows it.

**INTERNATIONAL TRANSFERS**

There may be a requirement to transfer information to countries outside the European Economic Area (for example, to a research partner). 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 European Commission (**EC**) adequacy decision in respect of its data protection standards, Imperial College London will enter into a data sharing agreement with the recipient organisation that incorporates EC approved standard contractual clauses that safeguard how your personal data is processed.

**CONTACT US**

If you wish to raise a complaint on how we have handled your personal data or if you want to find out more about how we use your information, please contact Imperial College London’s Data Protection Officer via email at dpo@imperial.ac.uk, via telephone on 020 7594 3502 and via post at Imperial College London, Data Protection Officer, Faculty Building Level 4, London SW7 2AZ.

If you are not satisfied 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). The ICO does recommend that you seek to resolve matters with the data controller (us) first before involving the regulator.