

Questions:

1. Who was the data controller, and any data processor, for the McBride-Hill / BHSC workplace culture and behaviours survey or equivalent engagement exercise?
2. Was a data-processing agreement in place, and which legal entity now holds the survey response data and any contact-detail data?
3. What lawful basis under UK GDPR Article 6 was relied on, and, if special-category data was or was likely to be collected, which Article 9 condition?
4. Was a Data Protection Impact Assessment completed? If so, please provide it, redacted for personal data if required.
5. What privacy notice, fair-processing notice or respondent information was provided to staff at the point contact details were requested?
6. What were the stated purposes for collecting respondents' contact details, and what retention period applied to them?
7. If the survey was anonymous, how was the contact-email field separated, secured and operationalised for follow-up?
8. If the survey data was linkable to contact details, who held the link, who could access it, and what triage/follow-up records were created?
9. Have any response records, contact details, linkage keys, triage logs or follow-up records been deleted? If yes, please provide the deletion date, policy basis and authorising role.

Responses:

1. For the McBride-Hill / BHSC workplace culture and behaviours survey / equivalent engagement exercise, DoH was the data controller. Citizen Space (DoF), Peter McBride and Jennifer Hill Consultant Associates were data processors.
2. Yes, a data-processing agreement was in place - SPPG of the DoH holds the survey response data.
3. The lawful basis relied upon in this instance is detailed in Article 6 (1) (e) of UK GDPR – known as Public Task: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. A Data Protection Impact Assessment (DPIA) was not undertaken as the survey was deemed to be very low risk processing – the only identifiable data field which would have been submitted on the survey was the responders email address and inclusion of this was entirely optional and not a mandatory requirement. The survey advised responders not to include identifiable data.
5. A privacy notice was included on Home page of survey – please see appendix 1 attached.

6. The purpose of this engagement was to ensure staff voices were heard. Collecting respondents' contact details enabled the opportunity, where possible, to meet with Mr Peter McBride.

Records generated as a result of the survey are held in line with the Department of Health's retention and disposal policy known as 'Good Management, Good Records' (GMGR). The category of record was detailed in Section J12 of GMGR and relates to contact details. The GMGR Disposal Schedule can be found on the DoH website at the following link:

- [Good Management, Good Records - Disposal Schedule | Department of Health](#)
7. The Survey Report generated did not include individual contact-email field. This was separate, it was in the hand of the responder then a second report was generated by the SPPG of DoH only to facilitate the operationalised follow-up.
 8. The survey data was held by SPPG of DoH, access was restricted to the Administrative Officers assisting with triage and follow-up.
 9. No, deletion date is in line with GMGR disposal schedule ref J12.

Date response issued: 22nd July 2026
Reference Number: DOH 2026-0156

Privacy Notice for BHSCT Staff Survey

Data Controller Name: Department of Health (DoH)
Address: Castle Buildings, Stormont, BELFAST, BT4 3SG
Email: peter.mcbride@hscni.net

Data Protection Officer Name: Charlene Maher
Telephone: 02890522353
Email: DPO@health-ni.gov.uk

Being transparent and providing accessible information to individuals about how we may use personal data is a key element of the [Data Protection Act \(DPA\)](#) and the [UK General Data Protection Regulation \(UK GDPR\)](#). The Department of Health (DoH) is committed to building trust and confidence in our ability to process your personal information and protect your privacy.

Purpose for processing

We will process personal data provided in response to this survey for the purpose of informing the development of our policy, guidance, or other regulatory work in the subject area of the request for views. We may publish a summary of the survey responses but this will not contain any personal data. We will not publish the names or contact details of respondents.

If you have indicated that you would be interested in further contact, then we might process your contact details to get in touch with you.

Lawful basis for processing

The lawful basis we are relying on to process your personal data is Article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary for the performance of our public tasks in our capacity as a Government Department.

How will your information be used and shared

We process the information internally for the above stated purpose. We don't intend to share your personal data with any third party. Any specific requests from a third party for us to share your personal data with them will be dealt with in accordance with the provisions of the data protection laws.

How long will we keep your information

We will retain survey response information until our work on the subject matter of the consultation is complete, and in line with the Department's approved Retention and Disposal Schedule [Good Management, Good Records](#) (GMGR).

What are your rights?

- You have the right to obtain confirmation that your data is being [processed, and access to your personal data](#)
- You are entitled to have personal data [rectified if it is inaccurate or incomplete](#)
- You have a right to have personal data [erased and to prevent processing](#), in specific circumstances
- You have the right [to 'block' or suppress processing](#) of personal data, in specific circumstances
- You have the right to [data portability](#), in specific circumstances
- **You have the right to** [object to the processing](#), in specific circumstances
- **You have rights in relation to** [automated decision making and profiling](#).

How to complain if you are not happy with how we process your personal information

If you wish to request access, object or raise a complaint about how we have handled your data, you can contact our Data Protection Officer using the details above.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
[ICO Complaints Form](#)