

Privacy statement GGD Limburg-North for the GGD Health Monitor 2022

The GGD Limburg-North is in normal circumstances commissioned by the municipality to monitor the health, well-being and lifestyle of adults and the elderly at least once every four years; this is the GGD Health Monitor. This year, an extra monitor is being carried out to assess the impacts of the coronavirus pandemic. The GGD Health Monitor 2022 will be carried out between September 23th and December 9th 2022 among adults (18–64) and the elderly (65+). Participants in the monitor may fill in the questionnaire online or on paper. The obligation to carry out such a monitor is set out in the Dutch Public Health Act (*Wet publieke gezondheid, Wpg*). As well as this four-yearly monitor, the Wpg also sets out an obligation to conduct a health outcome assessment after a disaster (*Gezondheidsonderzoek bij Rampen, GOR*). 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.

The GGDs have worked together with GGD GHOR (the national umbrella organisation for the GGDs), 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). VWS has commissioned RIVM to support the GGDs in this, for example in setting up and implementing the study, but also in processing the data. CBS is also providing support for the GGD Health Monitor, for example by creating the random sample population for the monitor.

This extra GGD Health Monitor is part of a broader research programme to investigate the impacts of the coronavirus pandemic. The GOR Network, which is a joint collaboration between RIVM, GGD GHOR, Nivel and ARQ National Psychotrauma Centre, is also a partner in this programme. The research programme is being funded by ZonMw for the Dutch Ministry of VWS.

The parties involved in the GGD Health Monitor 2022 will process sensitive and non-sensitive personal data. In this privacy statement, The GGD Limburg-North 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.

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.

Will the GGD Limburg-North process my personal data and, if so, which?

To achieve the aims described above, the GGD Limburg-North will use a questionnaire (online and paper) 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). The GGD Limburg-North 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 data from the sample will be used to send VVV Gift Cards to prize winners after the fieldwork. Everyone who completes the questionnaire (online or on paper) has a chance to win one of the 1,900 €50 VVV gift cards.. At the end of the questionnaire someone can indicate whether he or she would like to participate in the prize draw.

The email addresses of participants, who indicate in the questionnaire that they would like to participate in follow-up research, are stored in a separate file. In this way, no link can be made between the research data and the respondent's e-mail address. These data will only be used for the invitation for follow-up research and will never be shared with others without permission. 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 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 be more accounted for in the results.

Every attempt will be made to minimise the potential identifiability of individuals therefore a data protection impact assessment (DPIA) has been conducted for the study. This is a tool to identify in advance the privacy risks of a data processing operation and then to be able to take measures to reduce the risks.

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, availability of informal care, social support, social contacts, impact of COVID-19, postponed healthcare, COVID-19 vaccination, major life events, consent follow-up survey (online questionnaire).

A preview of the GGD Limburg-North questionnaire for the GGD Health Monitor is available at www.ggdlimburgnoord.nl.

How will the GGD Limburg-North use the information provided in the questionnaires?

The GGD Limburg-North will produce reports for municipalities 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 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 is only permitted to use an anonymised dataset for research and publication purposes, which it will receive from RIVM.

Why is the GGD Health Monitor 2022 conducted (legal grounds)

The GGD Limburg-North is a medical health service that performs public health for the municipalities in South Limburg. One of the legal tasks that the GGD carries out for the municipalities is mapping out the health of the inhabitants.

The GGD Limburg-North is carrying out the monitor to comply with a legal obligation (Article 2, paragraph 2a and b, and Article 5a of the Wpg) and for the performance of a task of public interest, namely the monitoring of public health under the Wpg. While the Wpg states that public health must be monitored at least once every four years, it is now required in the context of disaster research (also an obligation based on the Wpg, as referred to in Article 2, paragraph 2, subparagraph g of the Wpg) that an extra monitor is carried out in intervening even years to obtain insight through epidemiologic analysis into the health situation of the target group of this GGD Health Monitor during and after the coronavirus pandemic.

In carrying out the GGD Health Monitor 2022, the GGD Limburg-North will only use data that is required in order to perform the statutory tasks that the GGD Limburg-North carries out on behalf of the municipalities and under the GOR.

Participation in the GGD Health Monitor 2022 is entirely voluntary. By completing the questionnaire (and sending it, if you fill it in on paper), you agree to participate in the GGD Health Monitor 2022. We will remind you of this when you start 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.

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

Only employees of the GGD Limburg-North who are responsible for performing the study will have access to the data. The answers will be handled and processed in strict confidence. The GGD Limburg-North 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.

RIVM and CBS will be sent the results of the completed questionnaires, excluding the specific local questions added by the GGD Limburg-North. This is set out in agreements drawn up between the cooperating parties. GGD GHOR, the umbrella organisation of the GGDs, will receive a file that does not contain any data that could be used to identify individuals, to support the GGDs in their analysis of the data at the national level.

The GGD, RIVM, GGD GHOR 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 have also signed a confidentiality agreement.

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 [Loket Gezondheidsmonitors](#) (Health Monitor Office). 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 [Loket Gezondheidsmonitors](#) under “*uitleg en 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 institutional authorisation is required.

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

The GGD Health Monitor 2022 aims to monitor the health of adults and the elderly over a period of time. This means that the GGD Limburg-North also requires 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 data will not be kept longer than strictly necessary for the purpose for which it was collected. The raw file (on which no processing has been carried out) will be stored for four years. Names and addresses will be deleted three months after completion of the monitor by I&O Research.

RIVM and CBS will also store the collected data in order to analyse the health situation at the national level. This is set out in agreements drawn up between the cooperating parties.

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 (stating your login details). You can also call 0800-0191 (available every day from 09:00 – 21:00).

If you would like to lodge a complaint, you may contact:

The GGD Limburg-North data protection officer: privacy@vrln.nl and / or by phone 06-52567650.

Should you have any questions concerning the study or how the GGD Limburg-North will handle your answers, you may contact:

The researchers of the GGD Limburg-North at: onderzoek@vrln.nl.

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 the GGD Limburg-North will handle your privacy, please refer to our general privacy statement: [Privacy statement GGD Limburg-North](#).

This statement was written and published in May 2021.