Suirbhé
Náisiúnta ar
Eispéireas Othar
Cónaitheach

National
Inpatient
Experience
Survey

Data Protection Impact Assessment

Summary 2026

About the National Inpatient Experience Survey

The National Inpatient Experience Survey is a nationwide survey asking people for feedback about their stay in hospital. The survey is carried out by the National Care Experience Programme, a partnership between the Health Information and Quality Authority (HIQA), the Health Service Executive (HSE), the Mental Health Commission (MHC) and the Department of Health. All patients aged 16 years and over discharged during the month of May 2026, who spend 24 hours or more in a public acute hospital and have a mobile phone number and postal address in the Republic of Ireland are asked to complete the survey. The results of the survey will be made available on www.yourexperience.ie.

Purpose

This document summarises the findings of a Data Protection Impact Assessment (DPIA), which was carried out to identify and mitigate risks to people who will be invited to take part in the National Inpatient Experience Survey 2026.

Why is it important to do a DPIA?

When personal, sensitive and special category data is processed, a DPIA must be carried out to identify and mitigate risks to the privacy of data subjects.

To carry out the National Inpatient Experience Survey, the National Care Experience Programme will process the data of people who spent more than 24 hours in one of Ireland's 40 public hospitals in May 2026. To take part in the survey, people must be 16 years of age or over and have a mobile phone number and address in the Republic of Ireland, to receive both a postal and SMS text message survey invitation. The data that is being processed will include the administrative data of patients, such as their name, address and contact details, to enable postal and SMS contact with eligible participants; and their date of birth, the hospital in which they received hospital care and where they were discharged to, to ensure they meet the eligibility criteria. In responding to the survey, participants will provide detailed information about their experiences of hospital care; from admission to hospital, to care and treatment, emergency department attendance and discharge from hospital.

Survey responses will be anonymised to ensure that no individuals can be identified from responses to open-ended questions. Once anonymised, survey responses will be retained for additional analysis, including comparisons with past and future National Inpatient Experience Surveys. The data will also be used to acknowledge what is working well in Ireland's participating hospitals, and identify areas of improvement to enhance future care. The data may be analysed by health service researchers under agreed conditions.

A DPIA is therefore necessary to ensure that all risks to the privacy of eligible survey participants are identified, and appropriate safeguards are put in place.

What is the legal basis for processing National Inpatient Experience Survey data?

The National Inpatient Experience Survey complies with data protection laws, including the General Data Protection Regulation (GDPR) 2016. Under Article 6(1)(e) of the GDPR[1] and Section 38 of the Data Protection Act 2018[2], personal data can be processed where necessary for the performance of a task carried out in the public interest. The processing of personal data is necessary to carry out a survey on the experience of people using hospital services. Article 9(2)(a) of the GDPR and Section 53 of the Data Protection Act 2018 permit the

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[1] European Union, General Data Protection Regulation (GDPR) [Internet]. 2016. Available at: https://gdpr-info.eu/art-6-gdpr/

[2] Government of Ireland, Data Protection Act 2018 [Internet]. 2018. Available at: http://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/html

processing of healthcare data, which is "special category data" under the GDPR, when processed in the public interest.

The National Inpatient Experience Survey is conducted in the public interest; the partner organisations of the National Care Experience Programme have committed to using the results of the survey to inform quality improvements in hospital care, policy, legislation and regulation.

Overview of the National Inpatient Experience Survey - data flow

This section provides an overview of the data flow of the National Inpatient Experience Survey.

Step one: healthcare providers (40 public hospitals) provide eligible participants with an information leaflet at discharge, to inform them that they may be invited to participate in a survey. Participants can opt out of the survey at this stage.

Step two: healthcare providers identify eligible survey participants from the sampling period and collate their contact details for the purposes of administering the survey. This information is quality assured by the HSE prior to sending it to the National Care Experience Programme.

Step three: the National Care Experience Programme oversees the distribution of the survey to eligible participants and where requested, opts people out of the survey.

Step four: eligible survey participants receive an SMS invitation to participate in the survey, with a link to complete the survey online. They receive two further communications by SMS and postal invite about the survey at weekly intervals. Eligible participants can opt out of the survey:

- while they are still in the hospital
- by calling 1800 314 093
- by emailing info@yourexperience.ie or
- by returning a blank survey questionnaire in the free post envelope provided.

Step five: survey responses are returned by participants to the National Care Experience Programme for processing.

Step six: survey responses are uploaded to a secure digital dashboard, where they are anonymised, cleaned, quality assured, analysed and reported on.

Step seven: the administrative data, for example the contact details of eligible participants, is destroyed within six weeks of the survey closing and the hard-copy survey responses are destroyed within two months of the survey closing, in line with the National Care Experience Programme Data Retention and Destruction Schedule. By this stage, the survey responses have been fully anonymised, meaning that the responses cannot be linked back to the person who completed the survey. You can find out more about our survey information governance here.

Methodology to conduct the DPIA

The DPIA was conducted as per the stages outlined in the Privacy Impact Assessment toolkit for health and social care, developed by HIQA. The stages were as follows:

Stage one: A threshold assessment was conducted and it was determined that a DPIA was necessary.

Stage two: The necessity and proportionality of the processing activities were assessed, with regard to their potential impact on the privacy rights of individuals and the right to have their personal data protected. Privacy risks and solutions were identified, in consultation with key stakeholders.

Stage three: Privacy risks were addressed and appropriate controls were put in place.

Stage four: A DPIA report was produced, approved and finalised.

Stage five: The findings of the DPIA were incorporated into processes and procedures.

Overview of risks

The DPIA identified nine risks. The safeguards put in place to mitigate the risks are also summarised in this section. Each risk is assigned a risk rating on the basis of the matrix in Table 2 on page 6. This matrix combines the impact of a risk, based on a scale of 1 to 5, with the likelihood of its occurrence, also based on a scale of 1 to 5. For instance, a risk that is almost certain to occur but only bears negligible consequences to a data subject's privacy would be assigned a rating of 5.

Table 1: Risk matrix

	Likelihood →				
Impact ↓	Rare 1	Unlikely 2	Possible 3	Likely 4	Almost certain 5
Negligible 1	1	2	3	4	5
Minor 2	2	4	6	8	10
Moderate 3	3	6	9	12	15
Significant 4	4	8	12	16	20
Substantial 5	5	10	15	20	25

Low (1-7) **Medium (8-14)** **High (15-25)**

Summary of risks

Risk 1: Responsibilities are undefined or unclear

There is a risk that the responsibilities and boundaries for the roles of data controller, data processor and healthcare providers participating in the survey are not clearly defined or assigned to the parties involved. This may result in non-adherence to processes developed to manage the privacy and security of participants' data.

Controls

The data controller has:

- put a contract, non-disclosure agreement and a data processing agreement in place with the data processor(s), which authorise and define data-processing activities necessary to administer the survey. The contract ensures that the data processors equally put agreements in place with any sub-processors
- agreed to a data sharing agreement with healthcare providers to ensure the secure transfer of eligible survey participants' data
- developed an information governance framework
- provided training and a process guide for staff involved in processing data to implement the National Inpatient Experience Survey.

Risk-rating: 6 (unlikely/moderate) – this represents a low risk.

Risk 2: Data quality and data breach

There is a risk that ineligible participants may be included in the survey or alternatively eligible participants will not be included in the survey, representing a data breach and mis-use of data respectively.

Consequently, eligible participants may be excluded or conversely ineligible participants may be included.

Controls

The National Care Experience Programme:

- oversees the provision of guidance and training for staff responsible for data transfer
- Tests the extraction and transfer to data in advance of the survey
- oversees a quality assurance process of the data
- oversees the retention of a list of ineligible survey participants and people who have opted out with their healthcare providers to quality assure the list of potentially eligible survey participants
- has developed a process to suppress survey responses completed by ineligible survey participants in the event that they receive and complete the survey.
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Risk rating: 6 (possible/minor). This represents a low risk.

Risk 3: Participants' self-disclosure of sensitive information

There is a risk that, in answering qualitative, open-ended questions in the survey, participants voluntarily disclose personal or sensitive information not required or sought by the survey, which may directly or indirectly identify them to healthcare staff. There is also a risk that service providers may be able to identify survey participants through their qualitative survey responses, if information disclosed by survey participants pertains to a specific complaint they raised with the service provider.

Controls

The National Care Experience Programme:

- has developed anonymisation criteria for qualitative survey responses to remove data that personally identify individuals
- has put a process in place to review and risk-rate all qualitative survey responses before making them available to healthcare providers

- will only give healthcare providers access to the data when they have a minimum of 5 responses from survey participants.

Risk-rating: 4 (likely/negligible) – this represents a low risk.

Risk 4: Data integrity

There is a risk that the confidentiality, integrity, or availability of personal, sensitive or special category data is jeopardised. This may entail intentional breach and use of data subject's information for nefarious, fraudulent and unintended purposes.

Controls:

The National Care Experience Programme:

- approves the processing of all data
- oversees the secure processing of all NCEP data, to include transfer, storage, use and destruction, in compliance with the GDPR
- oversees the provision of guidance and training for all staff processing National Inpatient Experience Survey data.

Risk-rating: 6 (unlikely/moderate) – this represents a low risk.

Risk 5: Re-identification using pseudonymised data

Administrative data (personal information collected to administer the survey, including the contact details of eligible participants) is retained until the last pseudonymised survey responses have been processed — approximately six weeks after the survey closes. There is a risk that participants' contact details could be linked with their pseudonymised survey responses.

Controls

The National Care Experience Programme:

- has developed a data retention and destruction policy and schedule to ensure secure and timely destruction of all personal data, and supervises and records data destruction practices
- ensures that all personal data is stored in password-protected, encrypted environments. All access to data is managed on a role basis and access rights are reviewed regularly
- stores administrative data separately to survey response data
- ensures that the contact dataset and survey responses are pseudonymised and stored securely and separately as outlined below
- ensures the survey responses are anonymised, by assigning anonymisation criteria
- has formalised roles and responsibilities for all parties processing survey data, such as data processors and healthcare providers, through data processing and data sharing agreements.

Risk-rating: 3 (unlikely/moderate) – this represents a low risk.

Risk 6: Personal, sensitive and special category data received by helpdesk

There is a risk that staff operating the Freephone helpline and email inbox may unnecessarily request personal and or sensitive data when dealing with queries from the public.

Controls

The National Care Experience Programme:

- does not record calls
- does not request personal data from individuals who make contact by phone or email
- receives emails on secure, encrypted, password-protected devices and deletes them when the survey closes
- has developed training and a process guide for helpline operators to ensure that they do not unnecessarily solicit personal data.

Operators only take personal data if a specific action is required, for example to opt an eligible participant out of the survey. Training includes a testing period to ensure that operators use the processes as outlined in the process guide.

Risk-rating: 3 (possible/negligible). This represents a low risk.

Risk 7: Unauthorised disclosure of a participant's recent hospital stay

There is a risk that surveys issued to participants (via SMS and post) may be accessed by unauthorised individuals, disclosing the fact that the intended recipient was recently discharged from hospital care. This may happen for example where the number provided is not for the participant but for another individual, such as a partner, friend or family member.

Controls

The National Care Experience Programme:

- arranges for the distribution of all communication by SMS and postal invite. Eligible participants will be informed about the survey distribution method and will be asked to confirm their number and address while in hospital
- does not send out invites where it is known that the telephone belongs to another individual
- Ensures that eligible telephone numbers are processed securely, in compliance with the GDPR.
- There will be no National Inpatient Experience Survey identifiable information on the envelopes sent to eligible participants, to ensure privacy is maintained.

Risk-rating: 3 (possible/negligible). This represents a low risk.

Risk 8: Transparency

There is a risk that eligible survey participants may not be fully aware that their data will be shared, processed and potentially used for secondary analysis.

Controls

To ensure that eligible survey participants are informed about the survey, the National Care Experience Programme:

- implements national and local media campaigns during survey sample and distribution periods
- provides eligible survey participants with information leaflets at key points of interaction with healthcare providers, informing them that they will be invited to take the survey
- arranges for the display of posters, banners and digital signage in inpatient and discharge settings
- ensures that communication with the public is accessible
- provides details of its data-processing activities on www.yourexperience.ie
- anonymises all survey responses before any secondary analysis of responses is conducted.

Risk-rating: 3 (possible/negligible). This represents a low risk.

Risk 9: Opt-Out Process

There is a risk that eligible survey participants may not be fully aware that if they request to opt-out of the survey at a hospital level, they could still receive the survey.

Controls

To ensure that eligible survey participants are informed about the survey, the National Care Experience Programme:

- implements national and local media campaigns during survey sample and distribution periods

- provides eligible survey participants with information leaflets at key points of interaction with healthcare providers, informing them that they can opt-out of the survey on receipt of survey invitation
- uses posters and digital signage in hospitals during the sampling period to inform eligible participants about the survey and how to opt-out
- Frequently asked questions (FAQs) to provide information as to why you may have received the survey and how you can opt-out.

Next steps

This document reflects the feedback from all stakeholders in relation to identified risks for the National Inpatient Experience Survey 2026 and will be published on www.yourexperience.ie.

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