InHealth | INTELLIGENCE

Privacy Notice - Diabetic Eye Screening

The NHS in England operates a national Diabetic Eye Screening Programme (DESP) to prevent sight loss. InHealth Intelligence is pleased to have been commissioned by NHS England & NHS Improvement to support the delivery of diabetic eye screening for over 1 million people with diabetes across several local programmes.

Please read this Privacy Notice carefully as it sets out the basis on which any personal data we process will be handled. This Notice sets out the types of personal data that we collect about you and will explain how and why your personal data is used. We will also explain how long your data will be kept and when, why and with whom your data may be shared.

The Notice sets out the legal basis we have for processing your personal data and explains the effects of refusing to provide the personal data requested. We will also explain the various rights and choices that you have when it comes to your personal data and how you can contact us.

What personal data do we collect about you and where from?

Information from your eye screening appointment (including your results and images), your GP Practice and the Hospital Eye Service will be kept on a register of people with diabetes to provide this service and monitor your needs and the quality of care provided. The register holds your full name, NHS number, gender, date of birth, ethnic group, phone numbers, correspondence addresses, and details of your GP Practice, as well as details of your medical record related to diabetes and eye health.

Who do we share your personal data with?

The DESP will keep information about you and your diabetes care to ensure we deliver a safe and quality service. The register is maintained by InHealth Intelligence, a trading name of Health Intelligence Ltd, an NHS Business Partner contracted by the NHS to deliver this service.

Dispatch of Diabetic Eye Screening Invitation and Result Letters
InHealth Intelligence currently send invitation, reminder, and result letters for over 1 million people with diabetes. We therefore use a letter dispatch service provided by Synertec Ltd and UK Mail who securely print and dispatch our letters via Royal Mail business class. Details of your name, address and appointment are provided to support this service. The letter information is only retained for a short period which allows printing and dispatch. Once dispatched, data is retained for 90 days to allow for monitoring of service performance and is deleted afterwards.

Voice Messaging Service
InHealth Intelligence engages Yakara Ltd to generate appointment reminder telephone voice messages. Details of your name, telephone number and appointment are provided to support this service. The information is only retained for a short period which allows the reminder telephone calls to be made. This data is used only for this purpose and is retained for a short period to allow for monitoring of service performance.

Gov.uk Notify Service
Gov.uk Notify provides a text messaging service which is used by InHealth Intelligence to send text messages to patients in relation to their screening appointments. To support this, your mobile

telephone number and time/venue of screening appointments is shared with Gov.uk Notify. This data is used only for this purpose and is retained for a short period to allow for monitoring of service performance.

Training and Research for ourselves and other third parties

If you have consented for such sharing, your data may be used for training and research purposes internally or shared with other third parties involved in the improvement of retinal screening *(see Table 1 for specific details)*. This will only occur with your explicit consent.

How can I opt-out of my images being used for research and training?

This is very easy to do, just email our Data Protection Officer on dpo@inhealth-intelligence.com. Simply title your email 'Opt-out' and provide your name, address, and contact number in the body of the email.

How long do we keep your personal data for?

We will keep your information for the length of the contract we have with NHS England to supply the diabetic eye screening service. After this time, we will securely transfer your data and images to the new provider under instruction from NHS England, then delete all personal data in a secure manner.

Who has access to your personal data?

The security arrangements that protect your privacy ensure that your data is only accessed by staff involved in the delivery of the Diabetic Eye Screening Programme, and healthcare professionals involved in your care working for InHealth Intelligence or the NHS and only for the purposes of direct care.

How will we communicate with you?

We will communicate with you via letter, text (SMS) message and voice message regarding your diabetic eye screening. If you wish to talk to us about your communication preferences, please call the Bookings Office.

What legal basis do we have for using your information?

The Secretary of State delegates several public health functions to NHS England. The public health functions agreement 2017 – 2018 enables NHS England to commission certain public health services which will drive improvements in population health, and this agreement sets out the service specifications which are to be commissioned to satisfy those public health functions. One such service is the National Diabetic Eye Screening Programme, and so it is commissioned by NHS England to discharge part of its public health duties.

NHS England has responsibility to ensure that the Diabetic Eye Screening service is seamless from entry in primary care through to integration with NHS management, treatment and care including working with NHS Hospital Trusts/Hospital Eye Services.

How do we protect your information?

We aim to ensure all personal data is held and processed in a secure way and we only let healthcare professionals who have a legitimate interest in your care access to your data. Examples of our security include:

Classification: Public
InHealth Intelligence Diabetic Eye Screening Privacy Notice (DESP)
Process Owner: Data Protection Officer

Version 6.0
12/11/2020
Page **2** of **6**

- Encryption – meaning that the information is hidden so that it cannot be read without special knowledge (such as a password)
- Controlling access to systems and networks, this allows us to stop people who are not allowed to see your data from accessing it
- Controlling access for different user roles, so only certain data required for a specific role is accessible
- Training our staff to ensure they know how to responsibly and securely handle data including how and when to report if something goes wrong
- Regular testing of our technology including keeping up-to-date on the latest security updates

We do not transfer personal data out the UK unless you explicitly consent to your data being used for research purposes with other third parties involved in the improvement of retinal screening (see Table 2 for specific details) but only within the European Economic Area (EEA)

Can you access the information we hold?

Your GP Practice has access to all the information we hold about you or contact/email the Data Protection Officer (details below) to request a Subject Access Request Form.

Do we use Cookies on our websites to collect personal data on you?

We use Google Analytics to collect anonymised information about the way people use our websites to provide a better service to you. For example, how many people visited the site, what pages they visited. We do not collect personal data such as URL location.

Where can I get further information?

If you have any queries or concerns about how we handle your personal data, please contact:

Mr Michael Pennington (Data Protection Officer)

InHealth Intelligence, Unity House, Road Five, Winsford Industrial Estate, Winsford, Cheshire, CW7 3RB

Email: dpo@inhealth-intelligence.com
Telephone: 01270 765124

For independent advice about data protection, privacy and data sharing issues, the Information Commissioners Officer (ICO) are always happy to help:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Website: www.ico.org.uk
Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

Classification: Public
InHealth Intelligence Diabetic Eye Screening Privacy Notice (DESP)
Process Owner: Data Protection Officer

Version 6.0
12/11/2020
Page **3** of **6**

Table 1 – *A List of Training and Research Third Parties*

When you have consented to your data being used for training and research purposes, we may share it with the following research collaborators for specific research studies. No data will be provided outside of the European Economic Area (EEA).

We may share your data with?	Purpose of sharing data?	What data is shared for those who consent to sharing for training & research purposes?
Moorfields Eye Hospital NHS Foundation Trust 162 City Road London EC1V 2PD	ORNATE India Study - A review of the factors that lead to/help prevent the development of various grades of Diabetic Retinopathy. Optos Research Project: Artificial Intelligence to support the early detection of Diabetes related eye-disease into NHS Diabetic Eye Screening Programmes.	Retinal images and associated grades, diabetes related clinical data and medication. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you). Retinal images and associated human grader based grades. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).
University College London (Institute of Ophthalmology) Gower St, Bloomsbury, London WC1E 6BT	ORNATE India Study - A review of the factors that lead to/help prevent the development of various grades of Diabetic Retinopathy.	Retinal images and associated grades, diabetes related clinical data and medication. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).
Queens University Belfast (Ophthalmology) University Road Belfast BT7 1NN	Optos Research Project: Artificial Intelligence to support the early detection of Diabetes related eye-disease into NHS Diabetic Eye Screening Programmes. Evaluation of Optos's automated grading software; improvements in their algorithms for detecting conditions.	Retinal images and associated human grader based grades. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).

Center for Eye Research, Department of Ophthalmology, Oslo University Hospital and University of Oslo, Kirkeveien 166, Building 36 0450 Oslo, Norway *With Statistical analytics supported by:* Dr. Petrovski BT Thomas Mann utca 27.I/5 4032 Debrecen Hungary	Research into eye conditions detectable via retinal images for people with diabetes.	Retinal images and associated grades, diabetes related clinical data and medication. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).
Eyenuk Europe Ltd 2nd Floor Waverley House, 7-12 Noel Street, London, W1F 8GQ	Evaluation of Eyenuk's automated grading software; improvements in their algorithms for detecting conditions.	Retinal images and associated human grader based grades. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).
IDx, LLC 2300 Oakdale Blvd. Coralville, IA 52241 USA *(Data does not leave European Economic Area)*	Evaluation of IDx's automated grading software; improvements in their algorithms for detecting conditions.	Retinal Images and associated human grader based grades. Ethnic Group, 5-year age band and gender (no other administrative data that could easily identify you).
Thirona BV Toernooiveld 300 6525 EC Nijmegen The Netherlands	Evaluation of Thirona's automated grading software; improvements in their algorithms for detecting conditions.	Retinal Images and associated human grader based grades. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).
Roche (was Visulytix Ltd) 22 Highbury Grove, Highbury East, London N5 2EF	Evaluation of Roche's automated grading software; improvements in their algorithms for detecting conditions.	Retinal Images and associated human grader based grades. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).

Classification: Public
InHealth Intelligence Diabetic Eye Screening Privacy Notice (DESP)
Process Owner: Data Protection Officer

Version 6.0
12/11/2020
Page **5** of **6**

Optos PLC Queensferry House, Carnegie Business Campus, Dunfermline, Fife, KY11 8GR	Optos Research Project: Artificial Intelligence to support the early detection of Diabetes related eye-disease into NHS Diabetic Eye Screening Programmes. Evaluation of Optos's automated grading software; improvements in their algorithms for detecting conditions.	Retinal Images and associated human grader based grades. Ethnic group, 5-year age band and gender (no other administrative data that could easily identify you).