DIABETIC EYE SCREENING PRIVACY NOTICE v9

Introduction
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. This Notice should be read alongside the InHealth Main Privacy Notice to ensure you are fully informed.

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.

Most of the personal data we process is provided to us directly by you. However, we will receive personal data and special category personal data from your GP, a primary healthcare provider such as a hospital where you have been referred for other healthcare services, or a family member.

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, an NHS Business Partner contracted by the NHS to deliver this service.

We may share data with such persons or third parties as are necessary in our view to enable your healthcare to be delivered. This may include:

- the NHS
- your GP
- any hospital or healthcare provider in which you are or will receive treatment

InHealth Limited is a company registered in England and Wales Registered No. 05190234
Registered Office: Burnham Yard, London End, Beaconsfield, Buckinghamshire, HP9 2JH

Dispatch of Diabetic Eye Screening Invitation and Result Letters
InHealth currently send invitation, reminder, and result letters for over 1.9 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 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.

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. 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 at data.protection@inhealthgroup.com Simply title your email 'DESP training and research Opt-out' and provide the programme name, 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?
Your personal data is only accessed by authorised staff who are involved in supporting and/or delivering the Diabetic Eye Screening Programme. We have appropriate security measures in place to ensure your personal data is only accessed on a need-to-know basis by InHealth staff to protect your privacy.

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

InHealth Limited is a company registered in England and Wales Registered No. 05190234
Registered Office: Burnham Yard, London End, Beaconsfield, Buckinghamshire, HP9 2JH

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.

Under data protection legislation (including Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR), we may only process your personal data if one of the following lawful bases apply, which will be considered on an individual basis.

a) We have your consent. You are able to withdraw your consent at any time. You can do this by contacting us. (Please refer to “How do you contact us?” below)
b) We have a contractual obligation with you that requires us to process your personal data
c) We have a legal obligation to process your personal data
d) We have to protect your vital interests – processing is necessary to protect someone’s life
e) We need it to perform a public task or exercising official authority
f) We have a legitimate interest to process your personal data

We process your personal data in accordance with Article 6(1)(e) of UK GDPR, where processing is necessary to deliver patient care under an NHS contract for services commissioned as part of the public healthcare system.

Where we process special category data, such as health information, we rely on Article 9(2)(h), which permits processing where it is necessary for medical diagnosis, the provision of healthcare or treatment, or the management of healthcare systems and services. This processing is carried out by, or under the responsibility of, a health professional or another person subject to a duty of confidentiality.

How do we protect your information?
We ensure all personal data is held and processed in a secure way and access to your data is limited to those who have a legitimate interest in your care.
Examples of our security include:

- 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

InHealth Limited is a company registered in England and Wales Registered No. 05190234
Registered Office: Burnham Yard, London End, Beaconsfield, Buckinghamshire, HP9 2JH

- 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 but only within the European Economic Area (EEA).

We continually strive to ensure our data security framework offers a robust defence against breaches of data security including through audits.

We are accredited with ISO 9001 Quality Management System, ISO 27001 Information Security Management Standard, and Cyber Essentials Plus. We comply with the NHS Data Security and Protection Toolkit (DSPT), this means we have measures in place to protect your data, keep it safe, and ensure it is used appropriately. The NHS DSPT is a national standard that organisations must meet to ensure they handle personal and health information securely and appropriately.

What rights do you have?
Under data protection legislation, you have rights including:

- Right of access: you have the right to ask us for copies of your personal data. This is called a “Subject Access Request”.
  Please send your full name, date of birth, address and details of the service or records being requested to data.protection@inhealthgroup.com
- Right to rectification: you have the right to ask us to rectify personal data you think is inaccurate or to complete information you think is incomplete.
- Right to erasure: in certain circumstances you have the right to ask us to erase your personal data.
- Right to restriction of processing: in certain circumstances you have the right to ask us to restrict the processing of your personal data.
- Right to object to processing: this right arises where Legitimate Interest (LI) is the legal basis for processing, you have the right to object to the processing of your personal data.
- Right to data portability: in certain circumstances you have the right to ask that we transfer the personal information you gave us to another organisation, or to you in a machine-readable format.
- Automated Decision Making (ADM) including profiling: We may use automated systems to support decision-making. Where these decisions have a significant impact on you, we will inform you and you will have the right to request a human review and to challenge the decision.

InHealth Limited is a company registered in England and Wales Registered No. 05190234
Registered Office: Burnham Yard, London End, Beaconsfield, Buckinghamshire, HP9 2JH

- Right to Complain: please see ‘Lodging a Complaint’ section below

We will usually respond to your request within one month. In some cases, where a request is complex or we have received multiple requests, we may extend this period by up to a further two months. If this applies, we will let you know within one month of receiving your request and explain why the extension is necessary.

To exercise any of these rights you need to contact us, please refer to ‘How to contact us’ section below.

Lodging a complaint
If you have reason to complain about how your personal data has been controlled or processed by us, please contact us by email at Your.Experience@inhealthgroup.com

We shall try to resolve your queries promptly and, if you remain unsatisfied, you have the right to contact the Information Commissioner’s Office at:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk

How to contact us
If you have any questions about this Privacy Notice, the personal data we hold about you, or you wish to exercise any of your rights, please contact us at:

Name: Data Protection Officer
Address: Burnham Yard, London End, Beaconsfield, Buckinghamshire, HP9 2JH
E-mail: data.protection@inhealthgroup.com

Please ensure you include your full name, date of birth, address and details of the service or records being requested.

Changes to the Privacy Notice
We may change this Privacy Notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

This Privacy Notice was most recently updated in June 2026.

InHealth Limited is a company registered in England and Wales Registered No. 05190234
Registered Office: Burnham Yard, London End, Beaconsfield, Buckinghamshire, HP9 2JH