

Telehealth - Florence - Privacy Notice

What is Florence or 'Flo'?

Florence, referred to as 'Flo' for short, is a type of telehealth communication system that uses text messages to help you and your health professional monitor and/or manage your health and wellbeing condition more closely. It is a web-based system, supplied to NHS Grampian under license by a company called Mediaburst.

Florence can be used for many reasons such as:

- monitoring the effects of starting or stopping a treatment programme;
- reminding or encouraging you to do something to take care of yourself;
- identifying flare-ups of your condition so that you get the right treatment sooner;
- identifying reasons why your condition might not be well controlled;
- offering advice and support during a programme.

This notice concerns the use of personal data in the Florence or 'Flo' system. General information about how the NHS handles your health information can be found on [NHS Inform](#).

How is my personal data used?

Flo is a free to use service to patients in the UK and supports patients to engage with and adhere to a treatment plan, support decision making and allows them to manage their own health better.

Registering for Flo allows you and your health professional to exchange information via SMS text messaging using your own mobile phone. The system will hold some core data about you so that you are registered to use the system. The health information you exchange with your health professional will be defined by them in partnership with you. This is known as a 'protocol'.

You will be asked to agree to providing information to your health professional using this system and you do not have to do so. You will not be disadvantaged and your quality of care is not dependent upon you agreeing to use Flo.

If you do choose to use Flo, it is **essential that you provide your mobile telephone to your healthcare professional accurately**. It will be used to exchange your data between you and your healthcare professional, so please take extra care when providing your number and registering for Flo.

Before using Flo you should make sure that you are happy to exchange your information with your healthcare professional by text message. **Text messages are not encrypted and any information you send by text will be on your device. If you send your data to the wrong number it will be viewed by the person who has that number, not your healthcare professional.** You should make sure that your device is secure (passcode locked), that no-one knows your passcode, that you have turned off notifications that can be displayed whilst your device is locked, that you are happy to send personal information via text message and that you have double-checked the number before sending any information.

The personal information necessary for your registration on Flo is obtained directly from you or your health record, and entered by your health or care professional or a member of their team.

Any other personal data (including your healthcare data) stored in Flo will be provided by you in your responses to texts or may be added by staff if they communicate health information to you using the system.

Information you share with your healthcare professional using Flo will be held in the Flo system and may also be transferred to and form part of your medical records where appropriate.

What types of personal data are processed in Flo?

To register for the system, Flo requires your name and your mobile telephone number.

What special categories of personal data are processed in Flo?

This will depend on why you and your healthcare professional have agreed to use Flo and your protocol. However, your Community Health Index (CHI) number will be used as a unique identifier for all patients that register with Flo.

Examples of health information that might be exchanged between you and your health professional when using Flo include your clinical readings such as your blood pressure, weight, or blood sugar level. You might also be asked to provide responses to symptom and lifestyle questions such as mood, pain levels and activity levels.

Flo may also be used to send you reminders or updates concerning your appointments, treatment plans or healthcare needs. Whilst these updates may not contain healthcare data directly, it might be possible to infer healthcare information from them (for example if your appointment concerns a specific type of clinic).

Finally, your healthcare professional may also use the system to provide factual information requested by you (for instance links to information sheets).

Any health information exchanged between you and your healthcare professional will be agreed between you on a case-by-case basis.

Other special categories of personal data may also be processed by the system where directly relevant to your healthcare and included in your protocol. However, as with all information exchanged using Flo, this will be explained and agreed with you when your protocol is defined.

What is the lawful basis for my information being processed in Flo?

The lawful bases for processing your personal data is:

- 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; and
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (ie your request to use and our commitment to provide this added-value service).

The lawful bases for processing special categories of your personal data is that:

- processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional...; and
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law... (for example when making adjustments for a disability).

NHS Grampian will also process personal and special categories of personal data when appropriate/as required to protect your vital interest or those of another person, or to comply with legal obligations/for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity.

Personal data and special categories of personal data may also be processed for archiving, scientific or historical research purposes in the public interest in accordance with Article 89(1) of the General Data Protection Regulation and subject to appropriate safeguards.

Data controller

The data controller for your information within the Flo system is NHS Grampian - NHS Grampian has appointed Mediaburst (the providers of the Flo system) as its data processor. Mediaburst have signed a data processing agreement with NHS Grampian which sets out NHS Grampian's expectations and standards in respect of the protection of your data. If you are using Flo in conjunction with your GP Practice, NHS Grampian and your GP practice are joint data controllers for your information within the Flo system.

Your data will be processed within the UK, however if you choose to send information using text message whilst overseas please note that local laws, including different standards of data protection, will apply and that your information may be logged or otherwise intercepted.

Your data will be stored in the Flo system until your account has been unused for a period of five years. It will then be deleted. Where information becomes part of your medical record, it will be retained according to the applicable retention period.

Your information may be shared between NHS boards, health and social care partnerships and health and social care teams as appropriate for your care.

Your data may be processed for archiving, scientific or historical research purposes in the public interest in accordance with Article 89(1) of the General Data Protection Regulation and subject to appropriate safeguards.

Automated decision making and profiling

Your data will not be used to make automated decisions about you. Any decisions based upon this data will be made by appropriate health or social care professionals. You will be prescribed a personalised Flo protocol by your health or social care professional which will include the pre-determined messages that Flo may send you, according to the content of the protocol you have been prescribed, and this may include in response to information you provide by text.

The system does contain a 'profile' for you, but you will not be 'profiled' (ie considered as part of a wider cohort, all of whom are subject to the same decisions).

Your rights

NHS Grampian respects your rights and preferences in relation to your data. If you wish to update, access, erase, limit or complain about the use of your information, please let us know by emailing gram.dpo@nhs.scot and we will consider your request appropriately. You may also wish to contact the Information Commissioner's Office.