

NHS Grampian

Information Governance – Data Protection

GEMINI – Grampian's Evaluation of Mia an Innovative National Breast Screening Initiative

What is happening and how is my data being used?

The North East Scotland Breast screening programme screens approximately 20,000 women a year. The breast screening programme is designed for women between the ages of 50-70 to attend regular (3-yearly) mammography screening appointments with the aim of detecting breast cancer early, saving lives and resources. Each mammogram is double read by two breast radiologists or mammographers; however the breast screening and radiology workforce more generally are currently in crisis, due to acute global shortage of radiologists.

NHS Grampian (NHSG) is evaluating an Artificial Intelligence (AI) assisted breast screening tool called Mia (or mammography intelligent assessment) within the Radiology Department to test if it can help ease the workload of radiologists working in the reporting of breast screening images. If you have attend for a breast screening appointment within the evaluation period, the image taken by our radiographers will be processed in the normal way, however in addition the new technology will used to assess the images too. This will help us to assess how well the Mia tool works in a live clinical setting with real patients.

The use of AI in breast screening does not mean that the system is making decisions about you or your care by itself (i.e. this is not 'wholly automated' processing of your data). Mia is a decision support tool that analyses information quickly and provides information to clinicians, but the suggestions from the system are always reviewed by a NHS Grampian health professional.

All decisions concerning your care and treatment, and the responsibility for those decisions, remain with NHS Grampian health professionals.

You hold the right "Opt out" and request that Mia is not used to analyse your mammogram, if this is your wish please let the reception staff, or imaging technician know before or at the time of your appointment as we will be unable to stop the process after your image has been taken. Should you choose to "Opt out" we will ask you to share with us the reason for your decision, this information will be passed onto our researchers, however it will be completely anonymised, and the researchers will be unable to link this information back to you.

Personal data and Special categories of personal data

The evaluation will initially be carried out over a eight month period, between February 2023 and September 2023, but there may be a need to extend this period further to provide NHS Grampian with the data required to determine feasibility and success of the tool.

There is no personal data processed by the tool itself. The AI solution does not utilise personally identifying information for patients. Only the breast screening image and the images’ corresponding unique patient ID is processed by Mia; the company is unable to link the image to your personal identifiable data held by NHS Grampian such as your name, CHI, or address.

Data controller

NHS Grampian is the data controller for the personal data processed in this evaluation. Kheiron Medical, the company supplying Mia is the data processor. The AI tool processes data within the cloud, hosted by Microsoft Azure. The Kheiron Data centre is based in Dublin.

Kheiron and their approved sub-processors do not have any access to your data. NHS Grampian have signed an Agreement with Kheiron setting out instructions and standards on how your information is processed by them and their sub-processors, which includes additional contractual protection if your data is processed out with the UK and EU.

A list of Kheiron’s agreed sub-processors and their processing role in this evaluation is as follows:

Company	Location	Services
Amazon Web Services	Dublin	Cloud Computing Services
Grampian Data Safe Haven	Aberdeen	De-identify and securely provision de-identified data

NHS Grampian standard processes will apply in respect of the below mentioned data subjects’ rights.

This data is retained in the same way as other medical information we hold about you.

Please see our full privacy notice for more information -

https://foi.nhsgrampian.org/globalassets/foidocument/foi-public-documents1---all-documents/nhs_grampian_data_protection_notice.pdf.

Lawful processing

This evaluation is being carried out in the course of our usual activities which are part of our public task in the provision of healthcare services.

We assert that it is lawful for us to process your personal data in this way as:

- 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;

We assert that it is lawful for us to process special categories of your personal data (health and ethnicity) in this way as:

- 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 subject to the conditions and safeguards...;
- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity.

Your rights

We respect 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.infogovernance@nhs.scot in the first instance and we will consider your questions.

You may also wish to contact the Information Commissioner's Office for information on data protection, or to raise a concern or a complaint. Further information can be found on their website at www.ico.org.uk