

NHS Grampian
Information Governance – Data Protection
CAIRN Project – Privacy Notice

What is happening and how is my data being used?

NHS Grampian is evaluating remote monitoring technology in Hospital at Home teams and virtual wards to allow patients to get hospital level care at home safely. On discharge from hospital you may be invited to participate in the evaluation should your clinician believe you would benefit from recuperating at home in familiar surroundings but still require close monitoring by a Health Care Professional.

Current Process:

The Hospital at Home programme in Scotland has been supported by the Scottish Government for around a decade, and there has been deployment in Health Boards at different levels of progress. Currently, there is little use of technology by Hospital-at-Home teams, and care is most often delivered by regular face-to-face appointments at home, supported by telephone calls and manual paper-based record keeping.

Proposed Process:

Feebris provides technology to support Virtual Wards / hospital at home programmes. This allows patients to get hospital-level care at home safely and in familiar surroundings, helping speed up their recovery while freeing up hospital beds for patients that need them most. This includes providing kits of medical devices to monitor vital signs, an app to facilitate conducting check-ups using these devices and a web portal for clinician monitoring of the patients.

Personal Data and Special Categories of Personal Data

The evaluation will take place over a 12 month period, between June 2026 and June 2027. The personal data processed by the Feebris platform and app will include your title, name, date of birth, gender, home address, postcode, email address, telephone number, Next of Kin details and GP name, CHI number (NHS number) and details specifically related to your health and social care situation.

The data will be supplied from the demographic details stored on our NHS systems and readings from the medical devices and information you provide to the clinician in response to clinical questionnaires related to your health.

The personal data being processed is the minimum amount required to allow evaluation of the platform. It is required for identification purposes and provide real-time health information to your clinician.

Data Controller

NHS Grampian is the data controller for the personal data processed in this evaluation. Feebris, the company providing the Hospital at Home technology, is the data processor. Personal data and clinical data is returned to your NHS Grampian and is retained in the same way as the other medical information we hold about you. The technology processes data within the cloud, hosted by Amazon Web Services based in London.

Feebris and their approved sub-processors (not limited to AWS) do not have routine access to your personal data. NHS Grampian has signed an Agreement with Feebris setting out instructions and standards on how your information is processed by them and their sub-processors.

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

Sub-Processor	Purpose of Processing Activity	Location of Processing Activity	Transfer Safeguard
Amazon Web Services	Data hosting	UK	N/A
Google	Login authentication	EEA	Adequacy
Intercom	User support	EEA	Adequacy
Microsoft	User support	EEA (Ireland)	Adequacy
Posthog	User support (crash/use logs)	US	UK extension to EU-US Data Privacy Framework
Sentry	User support (crash/use logs)	US	UK extension to EU-US Data Privacy Framework
Slack	User support	EEA (Ireland)	Adequacy
Whereby	Video calls	EEA (Ireland)	Adequacy

NHS Grampian's standard process 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;
- processing is necessary for compliance with a legal obligation to which the controller is subject.

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.