

Privacy Notice

Name of Process: Near Me Video Consultation Service using Attend Anywhere.

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation (“the legislation”), that is, the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR.

| | |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| *Data Controller | Edinburgh Napier University |
| *Purposes for collection/processing | <p>The Attend Anywhere platform provides a mechanism to allow members of the public the choice to attend health and care appointments via video call where appropriate. Near Me, the brand, has been adopted and refers to the video consulting service that uses the Attend Anywhere platform.</p> <p>The purpose is for Physiotherapy students to use the Near Me Service within simulated scenarios to mimic its use in clinical practice. This will be for one to one individual video calls and also for group consultations using peer role play and volunteer actors playing simulated patients.</p> <p>The privacy policy for Attend Anywhere can be found here, https://www.vc.scot.nhs.uk/aa-privacy-policy/</p> |
| *Legal basis | <p>Legal Basis for processing:</p> <p>6(1)(e) – 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.</p> <p>Legal Conditions for Special Category Data:</p> <p>Only where data concerning health is included in the Waiting Area name:</p> <p>9(2)(h) - Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, <i>the provision of health or social care or treatment or the management of health or social care systems and services [and therefore the training of health professionals]</i> on the basis of domestic law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to therein;</p> |

| | <p>As Near Me is being used for simulated patients and not with real patients, special conditions are unlikely to apply as health scenarios are fictional.</p> | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------------|---------------------------------|---------------|-----------------------------------|-----|------------------------------|--------------|------------|-----|-------------------------|--------------|------------------------------------------------------------------------|----------------------------------------------------|------------------------------|--------------|---------------|-----|------------------------------|------------------|--------------------------------|-----|------------------------------|
| <p>Whose information is being collected</p> | <p>Service users: Students, Staff and Simulated patient volunteers. Service provider: Students or Staff.</p> <table border="1" data-bbox="608 488 1382 1637"> <thead> <tr> <th data-bbox="608 488 810 819">Categories of individuals</th> <th data-bbox="810 488 1013 819">Categories of personal data</th> <th data-bbox="1013 488 1216 819">Any special categories of personal data [see Guidance Notes for definition]</th> <th data-bbox="1216 488 1382 819">Sources of personal data</th> </tr> </thead> <tbody> <tr> <td data-bbox="608 819 810 965">Service users</td> <td data-bbox="810 819 1013 965">Name, phone number, date of birth</td> <td data-bbox="1013 819 1216 965">N/A</td> <td data-bbox="1216 819 1382 965">Provided by the service user</td> </tr> <tr> <td data-bbox="608 965 810 1077">Service user</td> <td data-bbox="810 965 1013 1077">IP Address</td> <td data-bbox="1013 965 1216 1077">N/A</td> <td data-bbox="1216 965 1382 1077">Collected by the system</td> </tr> <tr> <td data-bbox="608 1077 810 1335">Service user</td> <td data-bbox="810 1077 1013 1335">Name of Waiting area for specific clinic the service user is attending</td> <td data-bbox="1013 1077 1216 1335">Dependent on Waiting Area name for specific clinic</td> <td data-bbox="1216 1077 1382 1335">Provided by service provider</td> </tr> <tr> <td data-bbox="608 1335 810 1480">Service user</td> <td data-bbox="810 1335 1013 1480">Email address</td> <td data-bbox="1013 1335 1216 1480">N/A</td> <td data-bbox="1216 1335 1382 1480">Provided by service provider</td> </tr> <tr> <td data-bbox="608 1480 810 1637">Service provider</td> <td data-bbox="810 1480 1013 1637">Email address and phone number</td> <td data-bbox="1013 1480 1216 1637">N/A</td> <td data-bbox="1216 1480 1382 1637">Provided by service provider</td> </tr> </tbody> </table> | Categories of individuals | Categories of personal data | Any special categories of personal data [see Guidance Notes for definition] | Sources of personal data | Service users | Name, phone number, date of birth | N/A | Provided by the service user | Service user | IP Address | N/A | Collected by the system | Service user | Name of Waiting area for specific clinic the service user is attending | Dependent on Waiting Area name for specific clinic | Provided by service provider | Service user | Email address | N/A | Provided by service provider | Service provider | Email address and phone number | N/A | Provided by service provider |
| Categories of individuals | Categories of personal data | Any special categories of personal data [see Guidance Notes for definition] | Sources of personal data | | | | | | | | | | | | | | | | | | | | | | |
| Service users | Name, phone number, date of birth | N/A | Provided by the service user | | | | | | | | | | | | | | | | | | | | | | |
| Service user | IP Address | N/A | Collected by the system | | | | | | | | | | | | | | | | | | | | | | |
| Service user | Name of Waiting area for specific clinic the service user is attending | Dependent on Waiting Area name for specific clinic | Provided by service provider | | | | | | | | | | | | | | | | | | | | | | |
| Service user | Email address | N/A | Provided by service provider | | | | | | | | | | | | | | | | | | | | | | |
| Service provider | Email address and phone number | N/A | Provided by service provider | | | | | | | | | | | | | | | | | | | | | | |
| <p>What type/classes/fields of information are collected</p> | <p>Type/classification of information include: <input type="checkbox"/> Personal details, including any information that identifies the data subject and their personal characteristics, including name, address, contact details, age, date of birth, sex, and physical description.</p> <p>Special category (sensitive) personal data concerns, reveals or is about:</p> | | | | | | | | | | | | | | | | | | | | | | | | |

person)

Health

Health data is not recorded on the platform but is requested and documented on clinical notes.

The name of the Waiting Area includes the word “Physiotherapy” so may provide evidence of health issues of patient.

Background Information:

A record of the advice given or outcome of the call is not recorded in the Attend Anywhere platform. A contemporaneous record of the content of the consultation will be entered by the service provider or clinician into the appropriate system such as the participant’s medical, care or service record. These records will be subject to the appropriate local polices.

Log files that contain the participant’s IP address will be created and retained in the Attend Anywhere platform for a period of 3 months to support system performance, reporting and troubleshooting. As the participant’s name, telephone number and date of birth is deleted within one hour of the video call ending, neither party (service provider nor Attend Anywhere) is able to link the IP address to the participant’s personal information taking into account all means likely reasonably. The service provider will know the name and contact details of the participant but not the IP address. Attend Anywhere will know the IP address but not the name and contact details of the participant.

The Attend Anywhere platform has functionality that enables a service provider to send the Waiting Area URL to the caller via email.

This functionality captures the participant’s email address and the text in the email message that will include the Waiting Area name. The Waiting Area is usually named after the service a participant is using. Therefore both the participant’s email address and service use is captured. AWS Ireland has been contracted to deliver this email delivery service and a data processing agreement exists between Attend Anywhere and AWS Ireland.

Staff data is required in order to set up a user account within the platform. This data is limited to staff user’s name and email address. This data is deleted when

| | |
|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>the user account is no longer in use. Effective processes will need to be established by the controller to ensure staff are removed from the system when leaving the organisation.</p> <p>Clinical group consultation functionality has been purpose-built for healthcare and can accommodate multiple callers for a consultation or discussion. A Waiting Area that is designated for group consultations can be used to hold a single consultation at a time. The group consultations call screen has been designed for management of a large number of callers. Service providers are able to admit all waiting callers, deny individual waiting callers or remove participants from the consultations. They can also turn off the callers camera and/or microphone if needed. Only a service provider can see the callers' names and callers can see other callers by their initials only. Service provider names are visible to all participants. 8x8 Jitsi-as-a-Service has been contracted to provide the capability for the group consultation call screen. They capture a participant's initials, user phone dial-in and IP address and a data processing agreement exists between Attend Anywhere and 8x8.</p> |
| <p>Who is the information being collected from</p> | <p>Name, DoB, phone number is collected from the service user.</p> <p>Email of patient for purpose of sending WA link is collected from the service provider.</p> <p>IP address is collected from the Attend Anywhere platform.</p> <p>Staff name and email (to set up account) is collected from the waiting area administrator within the controller organisation.</p> <p>If a service request is made, service provider's email and mobile number is collected from the service provider.</p> <p>For group consultations, the service user's initials, user phone dial-in and IP address is collected from the service user and platform.</p> |
| <p>How is the information being collected</p> | <p>Name, and date of birth data will be entered by the caller at call entry. This is used to identify the caller to the service provider. The data is deleted within one hour of the video call ending.</p> <p>Email address of patient is collected via service provider when providing waiting area URL.</p> |

| | |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>Staff name and email is collected when setting up Attend Anywhere account for the service provider/staff member.</p> <p>Service providers email and mobile phone will be collected if the service provider is having technical difficulties and submits a service desk request to Attend Anywhere.</p> <p>For a group consultation, the service user's initials, phone dial-in and IP address is collected upon the service user entering the group consultation platform.</p> |
| <p>*Who is personal data shared with internally and externally</p> | <p>Personal data entered by the participant is deleted within one hour of the video call ending and will not be shared with other services. There will be no sharing of personal data beyond the contract arrangements with Atlassian Pty Ltd (Australia); AWS Ireland; 8x8, Jitsi-as-a-Service (UK) and callstats.io (Germany)</p> |
| <p>Who keeps the information updated</p> | <p>Student accounts will be set up and remain active only for the period required for Near Me tutorials and simulations and will be deleted at the end of this time period. Individual Student accounts will be created used and then removed within a discreet time frame, by the ENU Near Me service administrator .</p> <p>No other information submitted into the Attend Anywhere platform needs to be updated.</p> |
| <p>*How long is the information kept for</p> | <p>The data that is provided by a participant at call entry (i.e. their name, date of birth and phone number) is deleted by Attend Anywhere within one hour of the video call ending.</p> <p>IP addresses are retained by Attend Anywhere for 3 months and then securely deleted.</p> <p>For the email service provided by AWS Ireland, the personal data processed is a participant's email address and the content of the email message that will include the Waiting Area name. This data is deleted after 90 days.</p> <p>Service provider email addresses and names are deleted when the user account is no longer in use. Effective processes will need to be established by (controller) providers to ensure staff are removed from the system when leaving the organisation.</p> |

| | |
|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>The platform's activity dashboard and national evaluation report(s) will be held for ten years. (NB These reports do not contain participant personal data.)</p> <p>For group consultations, all data is encrypted and retained for 2 weeks in log files. The user phone dial-in is encrypted and retained for a maximum of 1 month in 8x8 callstats.io, an analytics tool, for debugging purposes.</p> |
| <p>*Will the data be used for any automated decision making</p> | <p>No</p> |
| <p>*Is information transferred to a third country outside the UK?</p> | <p>The primary data centre is in London. Media relay components are also located in Dublin in the Republic of Ireland</p> <p>The data that is provided by a participant at call entry (i.e. their name, telephone number and date of birth) is deleted by Attend Anywhere within one hour of the video call ending and will not be transferred or accessed outside the EEA.</p> <p>IP address information may be transferred to Attend Anywhere Pty in Melbourne, Australia for the purposes of system management and call logging. Data transmission is encrypted.</p> <p>Where a service provider sends the waiting area URL to a participant by email via the Attend Anywhere platform, the participant's email address is stored in the EEA. The safeguards in place include the data does not contain the participant's name or any other personal data. A data processing agreement exists between Attend Anywhere and AWS Ireland; this includes the UK standard contractual clauses.</p> <p>Where a service provider logs a service request, if any issues with the Attend Anywhere platform arise. This may capture the service provider's contact details, including email address and phone number. Atlassian Pty Ltd (Australia) supply this functionality to manage and respond to service requests. When analysing technical issues, all data remains in a secured EU hosting site, with access granted remotely. A data processing agreement exists between Attend Anywhere and Atlassian Pty Ltd (Australia); this includes the UK standard contractual clauses.</p> |

| | |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>For the group consultation call service provided by 8x8, Jitsi-as-a-Service, the personal data processed is a participant's initials; user phone dial-in and IP address. These details are retained in the UK in log files for 2 weeks and then deleted. The IP address and user phone dial-in are also retained for 1 month in 8x8, callstats.io in Frankfurt, Germany for debugging purposes and then deleted.</p> |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

*This information is provided to supplement the University's main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data.

You can access all the University's privacy notices using the following URL:
<https://www.napier.ac.uk/privacy-policy>

*You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: <https://www.napier.ac.uk/privacy-policy>