

**TwynSyght Privacy Statement**

**1. Overview**

TwynSyght is a clinical productivity assistant designed to enhance the efficiency of mental health services. It utilises advanced natural language processing (NLP) and machine learning (ML) technologies to process mental health records. TwynSyght operates on Psych-UK Ltd infrastructure and integrates directly with the MedQare database.

**2. Data Processing**

Purpose

TwynSyght processes data to identify key risk items and generate decision-specific summaries from mental health records.

Data Types

We process sensitive personal data, including mental health notes and records.

Data Source

TwynSyght accesses data directly from the MedQare database.

Processing Activities

Our processing activities include:

- Scanning mental health notes

- Identifying risk items

- Generating summaries

- Integrating processed information into MedQare

Data Retention

Data retention is subject to Psych-UK Ltd's retention policy. For specific details, please refer to Psych-UK Ltd's data retention guidelines.

**3. Lawful Basis**

Our processing of personal data is based on the provision of health care by a health provider. We process this data in accordance with:

UK GDPR Article 6(1)(e) which states “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 “.

To process the health related data we rely on UK GDPR Article 9(2)(f) which stipulates “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 domestic law or pursuant to contract with a health professional.”

**4. Data Protection Measures**

Access Control

Access to risk items is limited to trained, registered mental health professionals. Non risk items may be accessed by totable qualified staff.

Data Security

We implement robust security measures including:

- Encryption of sensitive data

- Strict access controls

- Secure connection to the MedQare database

Audits and Security

We conduct regular security audits and implement integration security measures to ensure the ongoing protection of data.

**5. User Rights and Responsibilities**

Intended Users

TwynSyght is intended for use by registered mental health professionals accredited by bodies such as GMC, NMC, and HCPC. Suitably qualified staff for non-risk related items.

Clinical Judgement

While TwynSyght aids in decision-making, it does not replace professional judgement. Users are responsible for interpreting and acting upon the information provided by TwynSyght.

**6. Data Subject Rights**

Data subjects have the following rights:

- Right to information

- Right to access

- Right to rectification

- Right to erasure

These rights are supported within the MedQare system. For specific procedures to exercise these rights, please contact the Data Protection Officer.

**7. Monitoring and Improvement**

We continually monitor and improve TwynSyght through:

- Performance validation

- User feedback mechanisms

- Bias mitigation strategies

- Regular compliance updates

**8. Additional Information**

Categories of Personal Data

We process mental health notes and records, which may include personal identifiers, health information, and other sensitive personal data relevant to mental health care. The processing includes anonymisation.

Recipients of Personal Data

Personal data processed by TwynSyght is accessible to authorised mental health professionals and qualified staff within Psych-UK Ltd.

Details of Transfers to Third Country and Safeguards

We do not transfer data outside of the UK*.*

Right to Lodge a Complaint with a Supervisory Authority

Data subjects have the right to lodge a complaint with the Information Commissioner's Office (ICO) if they believe their data has been processed unlawfully.

Details of Automated Decision Making, Including Profiling

TwynSyght does not make automated decisions or conduct profiling. It identifies risk items and generates summaries to aid professional decision-making but does not rate risks or make clinical decisions.

Purpose Changes

Any changes to the purpose of data processing will be communicated to data subjects in accordance with GDPR requirements.

Statutory or Contractual Necessity

The provision of personal data is necessary for the delivery of mental health care services. Failure to provide this data may affect the quality and efficiency of care provided.