

Privacy Notice – Invoice Validation

Invoice validation is an important process in ensuring that your care is paid for correctly. It involves using your NHS number to check that we are the CCG that is responsible for paying for your treatment. We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for.

The process makes sure that the organisations providing your care are paid correctly. All information with NHS numbers collected to validate invoices is held within a secure, controlled environment for finance (CEfF) (within/on behalf of) the CCG. The use of personal data by CCGs for invoice validation has been approved by the Confidentiality Advisory Group of the Health Research Authority and is scheduled for review 30 September 2018. Further information regarding this can be found here: <https://www.hra.nhs.uk/planning-and-improving-research/application-summaries/confidentiality-advisory-group-registers/>

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.

1) Controller contact details	Richmond CCG 180 High Street Teddington TW11 8HU
2) Data Protection Officer contact details	NEL Head of Information Governance nelcsu.dpo@nhs.net 03000 428 438
3) Purpose of the processing	To enable the CCG to ensure accurate payment of invoices. To provide accountability and fulfil their legal obligations.
4) Lawfulness Conditions and Special Categories	The lawful basis for processing, storing and sharing this data are;- Article 6(1)(c) “the processing is necessary for compliance with any legal obligation to which the controller is subject” The CCG does not require access to Special Category data for the purposes of Invoice Validation and will not process data at this level.
5) Recipient or categories of recipients of the processed data	The data will be shared with our external provider into a Controlled Environment for Finance (CEfF). Anonymised data will further be shared with NHS Shared Business Services (SBS) to arrange payment of the invoice.
6) Rights to object	You have the right to object to some or all the information being processed under Article 21 of GDPR. Please contact the Controller for more information. You should be aware that this is a right to raise an objection, which is not the same as having an absolute right to have your wishes granted in every circumstance. Under the Confidentiality Advisory Group review 10 October 2017 the requirement to oblige with patient objections from the flow of information to Controlled Environments for Finance (CEfF) which are required to support invoice validation was removed.

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7) Right to access and correct	<p>You have the right to access the data that is being shared and have any inaccuracies corrected. There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
8) Retention period	<p>The data will be retained in line with the law and national guidance. https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016 or speak to the Clinical Commissioning Group.</p>
9) Right to Complain.	<p>You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/</p> <p>or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)</p>