

Privacy Notice – Invoice Validation

Invoice validation is an important process in ensuring that your care is paid for correctly. It involves obtaining and sharing some personal data, usually your NHS number, to ensure your treatment is paid for appropriately.

Any personal information will only be shared with South West and Central Commissioning Support Unit (CSW CSU) to validate invoices and will be held within a secure, controlled environment for finance (CEfF) on behalf of First Community Health and Care CIC (Hereafter First Community). There is a robust contract in place between First Community and CSW CSU to ensure the security and confidentiality of your data. The use of personal data by commissioning support units for invoice validation has been approved by the Confidentiality Advisory Group of the Health Research Authority under application A0027 and is next scheduled for review 30 September 2020. Further information regarding this can be found [here](#).

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	First Community Health and Care CIC 2nd Floor Forum House 41 - 51 Brighton Road Redhill Surrey RH1 6YS
2) Data Protection Officer contact details	Jamie Sheldrake Email: nelcsu.dpo@nhs.net Tel: 03000 428 438
3) Purpose of the processing	To enable First Community to ensure accurate payment of invoices. To provide accountability and fulfil their legal obligations.
4) The 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” First Community does not require access to Special Category, 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 South West and Central Commissioning Support Unit. Anonymised data may further be shared with the appropriate Clinical Commissioning Group and NHS Shared Business Services (SBS) where appropriate, to arrange payment of the invoice.
6) Right to object	You have the right to object to some or all the information being processed under Article 21 of GDPR. Please contact the organisation 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	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.
8) Retention period	The data will be retained in line with the law and national guidance or speak to the organisation.
9) Right to Complain.	You have the right to complain to the Information Commissioner's Office, you can use this link https://ico.org.uk/global/contact-us/ Or by calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website).

ⁱ GDPR requires information regarding how your data is processed to be provided to you in an easily understandable format however, please feel free to contact the Controller if you have any further questions.