**Invoice Validation**

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| **Data Controller(s)** | NHS North East Lincolnshire CCG |
| **Purpose** | [Invoice validation](https://www.england.nhs.uk/ig/in-val/) is part of the process by which providers of care or services get paid for the work they do.  Invoices, with supporting information, are submitted to the CCG of their service for payment, but before payment can be released, the CCG needs to ensure that the activity claimed for each patient is their responsibility. These invoices are validated within a special secure area known as a Controlled Environment for Finance (CEfF) to ensure that the right amount of money is paid, by the right organisation, for the treatment provided. The nominated secure environment validating the invoice will require a copy of the invoice sent to NHS Shared Business Services, as well as the backing data to evidence the activity and patients claimed for. The process followed ensures that only the minimum amount of information about individuals is used by a very limited number of people and is designed to protect confidentiality. |
| **Type of information Used** | Identifiable (NHS number, date of birth or postcode) and Special Category (health information) |
| **Legal basis** | GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.  GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.  A [section 251](https://www.hra.nhs.uk/about-us/committees-and-services/confidentiality-advisory-group/legal-frameworks/) approval (CAG 7-07(a)(b)(c)/2013) from the Secretary of State, through the [Confidentiality Advisory Group](https://www.hra.nhs.uk/about-us/committees-and-services/confidentiality-advisory-group/) of the Health Research Authority, enables the CCG to process identifiable information for the purpose of invoice validation within a Controlled Environment for Finance. |
| **How we collect (the source) and use the information** | Organisations that provide treatment submit their invoices to the CCG for payment. The nominated secure area (Controlled Environment for Finance) receives additional information, including the NHS Number, or occasionally date of birth and postcode, from the organisation that provided the treatment.  NHS Digital sends information into the secure area, including the NHS number and details of the treatment received. The information is then validated ensuring that any discrepancies are investigated and resolved between the Controlled Environment for Finance and the organisation that submitted the invoice. The invoices will be paid when the validation is completed.  The CCG does not receive any identifiable information for purposes of invoice validation; however, we do receive aggregated reports to help us manage our finances. |
| **Data Processors** | The Controlled Environment for Finance uses NHS Shared Business Services as a Data Processor |
| **Transfers of Data Overseas** | NHS SBS carry out some of their processing activity in India. Where this occurs, it is governed by the use of approved Model Contract Clauses. |
| **Your Rights** | If you do not want the NHS to use information about you, collected by your GP then you can opt out by completing an opt-out form and returning it to your GP practice.  National Data opt outs (previously Type 2 opt outs) apply to invoice validation - where you do not wish for your information to be shared by NHS Digital.  Details of the national patient opt out can be found here: <https://digital.nhs.uk/services/national-data-opt-out/understanding-the-national-data-opt-out>  With regards to Invoice Validation under GDPR you have the right:   * To be informed about the processing of your information (this notice) * Of access to the information held about you * To have the information corrected in the event that it is inaccurate * To object to it being processed or used * Not to be subject automated decision-taking or profiling * To be notified of data breaches |
| **How long we will keep the information** | The organisation has adopted The Records Management Code of Practice for Health and Social Care 2021. Data will be retained in accordance with this code and the accompanied retention schedule. |
| **Who we will share the information with (recipients)** | This information is not shared outside of the CCG. |