

NHS Wales Shared Services Partnership (NWSSP)

Accounts Payable

Privacy Notice

1. Introduction

NHS Wales is made up of several health organisations that include the NHS Wales Shared Services Partnership (NWSSP). The NWSSP facilitates many functions on behalf of all NHS Wales Health Boards and Trusts.

This leaflet has been issued by NWSSP to describe the facilitation of identifiable information within the Accounts Payable function that resides within NHS Wales Shared Services Partnership (NWSSP).

If you have any questions regarding the information in this leaflet, you should contact the NWSSP Information Governance Manager.

2. Your rights

This leaflet (or Privacy Notice) covers the rights under a new law called the General Data Protection Regulation (GDPR). It is usually used to explain individual's rights and how we process identifiable data about a person or persons.

On this occasion, this information emphasises the NWSSP's need to make sure that we explain how information is used for Accounts Payable processing.

The information we give you about our use of identifiable information will be:

- Brief, easy to read and easily accessible;
- Written in clear, plain language; and
- Free of charge.

3. What laws do we use?

The law determines how we may use identifiable information regardless of the form it takes (paper/electronic). The laws we follow that allow us to use identifiable information are listed below:

- General Data Protection Regulation
- UK Data Protection Bill
- Human Rights Act
- Freedom of Information Act
- Common Law Duty of Confidence - Confidentiality
- Computer Misuse Act
- Audit Commission Act
- Regulation of Investigatory Powers Act

Purpose

The NHS Wales Shared Services Accounts Payable team provides a pivotal service for NHS Wales with regards to the payment of supplier invoices as a part of NHS Wales Procure to Pay (P2P) process.

From 1st September 2019, the Accounts Payable team resides in the Finance and Corporate Services division of NWSSP. The Accounts Payable team are responsible for the loading of supplier invoices onto Oracle, working in collaboration with Procurement Services staff and Health Board staff in resolving invoice queries, payments of those invoices when released/authorized for payment and new supplier set and all supplier maintenance activities.

This service comprises over 110 staff engaged in the invoice payment process, who process some 1.8 million invoice transactions per annum with a value in excess of £5 billion, for approximately 16,000 active suppliers.

Around 98% of the invoices are processed electronically. The majority of invoices processed are matched to a purchase order. An All Wales No Purchase Order No Payment policy was introduced in NHS Wales on 1st September 2018. There is an agreed list of exceptions and for these invoices, they are authorised and processed directly through Oracle without the need to raise a purchase order.

The service has to comply with a statutory Government Target of paying 95% of invoices to its suppliers within 30 days.

To ensure proper controls, approximately, 30 different reports are run daily, weekly and monthly, to examine all aspects of the payment and matching cycle using Procurement 'Business Intelligence' reporting One key report that is run, assists in identifying, investigating and recovering any duplicate payments.

4. What types of personal information do we use in Accounts Payable?

In order to carry out processing activities as an NHS organisation we use identifiable information that may be required in order to identify and verify an invoice or payment and to process these. These can be patient or personally identifiable from the source and these are handled confidentially whilst they are held within the service.

A list of identifiable information is also recorded by type in a central database which accounts for all the processes that are completed within NHS Wales Shared Services Partnership. This is known as an "Information Asset Register".

However, it is important to note that this does not include any identifiable information held about individuals, just processing activities as they have been explained in section 3 above.

5. What is the purpose of processing information within Accounts Payable?

Accounts Payable considered processes do not involve consent and data held and submitted to Accounts Payable is used where it is justified by law.

In this instance, under article 6 of the General Data Protection Regulation (lawfulness of processing) the following applies:

(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.

The reasons why Accounts Payable process data:

- Processing Supplier invoices, credit notes and manual payment requests
- Processing and running analytical reports

6. Sharing information

Information including identifiable, confidential information is only shared with other parties for purposes of:

- Verification of information (including overpayment or duplication of invoices or payments)
- Value for Money exercises (including use of an AP and procurement dashboard)
- Cost saving exercises

Under the law, identifiable information relating to Accounts Payable processing is shared and used by officers that are responsible for the processes explained in Section 3 above to ensure that invoices are paid and monetary/budgetary use of information is correct. Information is only shared so that only the appropriate people work together to processing information within the Accounts Payable setting.

It is important to note that anyone receiving identifiable information in connection with Accounts Payable functions is under a legal duty to keep it confidential and must have a legitimate reason for receiving it and holding it.

The NWSSP will only request, use and share the minimum information necessary to complete this task.

We will never sell information and we will not share it without the appropriate legal authority.

7. Security of Information

The NWSSP takes responsibility to look after identifiable information very seriously. This is regardless of whether it is electronic or in paper form.

We also employ someone who is responsible for managing information and its confidentiality to ensure:

- All information is protected; and
- Inform you how it will be used.

All staff are required to undertake training on a regular basis.

Comprehensive training is required to help protect the information that has been given to the NWSSP. The training makes sure that all staff working in the NHS are aware of their responsibilities with regards to the handling of identifiable information regardless of the department that they work in.

Evaluating Confidentiality

The person who is responsible for managing confidentiality will also consider the privacy and confidentiality of any data that is held and where the use of this changes. This is particularly important when the use of new technologies is proposed or changes to current arrangements is considered.

8. Permission (consent)

For the use of personal information to be lawful, the NWSSP may ask for permission in specific circumstances. This is not necessary if the use is for a lawful basis under current law and this would include the processing of information within the Accounts Payable team as consent is not something that would need to be considered for the processing activities within this function.

Consent is normally requested for use of a specific service users information within areas such as patient care.

In regard to consent required from a person will have been given freely and would have not been pressured to do so. This will be done clearly and those asked are aware of what the use of their information means.

9. Automated decision taking

The NWSSP also provides safeguards against risks that involve processes that include automated decision making.

This applies to you when:

- It is an automatic process; and
- There is a legal effect on decision made with your information.

The NWSSP Accounts Payable team may take a small number of automated decisions with your information but there is mostly some human involvement in this. For example, uploading/transferring information into systems, reporting, manual calculations and checking procedures.

However, the NWSSP will take steps to identify how many automated decisions it makes and whether these are acceptable.

What about automated profiling?

Automated profiling is where the NHS in Wales will only use information to identify and attempt to analyse identifiable information about a person.

For Accounts Payable, it is highly unlikely that automated profiling will be applicable.

The NWSSP will ensure that any automated profiling is fair and lawful. The NWSSP will use correct procedures, to include reducing errors and where data is not accurate if automated profiling is considered to be applicable.

Keeping information

We will only store information for as long as necessary. Records are stored in line with Records Management Code of Practice for Health & Social Care's retention and disposal schedule. This determines the minimum length of time records should be kept.

Making a complaint

If you wish to make a complaint about any issues you have experienced regarding the use of identifiable information or to ask any questions relating to confidentiality of such information, please contact:

Tim Knifton
Information Governance Manager
tim.knifton@wales.nhs.uk

If you are still unsatisfied following your complaint and this remains unresolved, you have the right to make a complaint to the:

Information Commissioner's Office,
2nd Floor,
Churchill House,
17 Churchill Way,
Cardiff, CF10 2HH

Email: wales@ico.gsi.gov.uk
Website: www.ico.org.uk

Links

More information on the Accounts Payable function

<https://nwssp.nhs.wales/ourservices/procurement-services/about-procurement-services/who-we-are/accounts-payable/>

Frequently asked questions

<https://nwssp.nhs.wales/ourservices/procurement-services/about-procurement-services/frequently-asked-questions/accounts-payable-faqs/>

Further information

For more information relating to this leaflet or questions on the content of this information, please contact Russell Ward, Head of Accounts Payable and eEnablement or:

Email: Russell.ward@wales.nhs.uk