

# Privacy Notice – Business Services Organisation

## 1. Introduction

The Business Services Organisation (BSO) has been established to provide a broad range of regional business support functions and specialist professional services to the health and social care sector in Northern Ireland. More detailed information about different aspects of our work can be found on our website. <http://www.hscbusiness.hscni.net/>

BSO recognises the importance of protecting personal and confidential information in all that we do and all that we direct or commission, and takes care to meet its legal duties. Key legislation includes:

- UK General Data Protection Regulation (UK GDPR)
- UK Data Protection Act (2018)
- the Access to Health Records (Northern Ireland) Order 1993 (AHR)
- the Freedom of Information Act (2000) (FOI),
- the Environmental Information Regulations (2004) (EIR),
- the Human Rights Act 1998 (HRA),
- relevant health service legislation, and the
- common law duty of confidentiality.

## 2. Personal Information

BSO uses personal information for a number of purposes. This privacy notice provides a summary of how we use this information. To ensure that we process personal information fairly and lawfully we are required to advise:

- What personal information we collect
- Why we need this information
- How it will be used
- With whom it will be shared
- How long it will be kept for

### 2.1 What types of personal information do we handle?

BSO processes a range of personal information across its different business units. The information that BSO may hold includes:

- names, addresses, telephone numbers, e-mail addresses
- family details, for example next of kin details
- employment details, for example, salary, HSC service information, sickness absence and other absence information
- details held in personnel files

BSO also processes 'special categories' of information:

- racial or ethnic origin

- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic or biometric information
- information concerning health
- medical records (including mental health)
- social care records
- information concerning sexual life / sexual orientation

For further information on the personal information processed across BSO's business units, please refer to Appendix 1.

## **2.2 Why we need personal information**

BSO processes information in order to provide a range of statutory functions, and functions that are within the public interest. BSO also processes personal information for legitimate private interests.

For further information on the personal information processed across BSO's business units, please refer to Appendix 1.

## **2.3 Where we get this information from**

The BSO receives personal information from a range of sources, namely:

- other HSC organisations;
- other statutory bodies;
- staff;
- service users;
- members of the public.

## **2.4 How will we use personal information?**

BSO processes information in order to fulfil its contractual and legal obligations, as well as obligations in the public interest.

For further information on how BSO processes personal information, please refer to Appendix 1.

## **2.5 Sharing personal information**

BSO may also be obliged to provide personal information to another statutory organisation (such as a Police Force, Health Regulator or Investigatory Body), or via a Court Order. BSO may also share personal information obtained from clients with counsel, 3<sup>rd</sup> party solicitors, courts and experts in the course of managing legal issues, as part of legal processes.

For further information on the sharing of personal information across BSO's business units, please refer to Appendix 1.

## 2.6 Retaining Information

BSO will only retain information for as long as necessary, in line with the Department of Health (DoH) Good Management, Good Records (GMGR).

For further information, please refer to the following DoH link:

<https://www.health-ni.gov.uk/topics/good-management-good-records>

## 3. Individual Rights

**Individuals have certain rights under GDPR, namely:**

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Further information on the above can be viewed via the Information Commissioner's Office (ICO) website:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## 4. Security of personal information

BSO is committed to taking all reasonable measures to ensure the security of all personal information it holds. The following arrangements are in place:

- a. All BSO staff have contractual obligations of confidentiality, enforceable through disciplinary procedures;
- b. Everyone working for the HSC is subject to the common law duty of confidentiality;
- c. BSO solicitors are required to comply with a professional duty of confidentiality in accordance with law society regulations;
- d. Staff are granted access to personal information on a need-to-know basis only;
- e. BSO has appointed a Senior Information Risk Owner (SIRO) who is accountable for the management of all information assets and any associated risks and incidents,
- f. BSO has appointed a Personal Data Guardian (PDG) who is responsible for ensuring confidentiality and security of services user information within the organisation
- g. BSO has also appointed a Data Protection Officer (DPO), who provides full authoritative advice and recommendations in the field of Data Protection and facilitates compliance with the Accountability requirement of GDPR;
- h. All staff are required to undertake information governance training every 2 years. The training provided ensures that staff are aware of

their information governance responsibilities and follow best practice guidelines to ensure the necessary safeguards and appropriate use of personal information;

- i. A range of policies and procedures are in place.

## **5. Access to information**

### **5.1 Subject Access Requests (SARs)**

GDPR gives individuals the right to access information that BSO holds about them by submitting a Subject Access Request (SAR). You will need to provide:

- adequate information (for example full name, address, date of birth) so that identity can be verified and information located
- an indication of what information is being requested, to enable BSO to locate this in an efficient manner

BSO aims to comply with requests for access to personal information as quickly as possible, and normally within a calendar month of receipt unless there is a reason for delay that is justifiable under GDPR.

We want to make sure that personal information is accurate and up to date. If you think any information is inaccurate or incorrect then please let us know.

### **5.2 Freedom of Information**

The Freedom of Information Act 2000 provides any person with the right to obtain information held by BSO, subject to a number of exemptions.

### **5.3 Complaints about how we process personal information**

If an individual is dissatisfied with how BSO is, or has been, processing their personal information, they have the right to advise BSO of this in writing.

## **6. Contact Details**

SARs and complaints may be made in writing or verbally. Freedom of information requests must be made in writing. Contact details are as follows:

- Subject Access Requests: [dpa.bso@hscni.net](mailto:dpa.bso@hscni.net)
- Freedom of Information Requests: [foi.bso@hscni.net](mailto:foi.bso@hscni.net)
- Complaints: [complaints.bso@hscni.net](mailto:complaints.bso@hscni.net)

You may also submit requests or complaints to:

Corporate Services  
6<sup>th</sup> Floor  
2 Franklin Street  
Belfast  
BT2 8DQ

**You may also contact the Data Protection Officer for the BSO directly:**

- Email: [dpo.bso@hscni.net](mailto:dpo.bso@hscni.net)
- Tel: 02895 363666

## **7. Changes to our privacy notice**

BSO will keep this privacy notice under regular review and will place any updates on this document.

## Appendix 1

Business Unit	Personal Information Processed	Reason(s) this information is required	Who information may be shared with	Legal Basis under GDPR
Clinical Education Centre (CEC)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Employment details</li> <li>• Attendance information (e.g. programmes attended and results)</li> <li>• Disability / dietary details (if applicable)</li> </ul>	<p>CEC requires information in order to provide education to nurses, midwives and Allied Health Professionals and consultancy to the voluntary, community and independent sectors.</p> <p>Specifically, CEC requires this personal information to:</p> <ul style="list-style-type: none"> <li>• Contact individuals about matters arising from bookings / attendance at events;</li> <li>• Distribute a delegate list to teaching staff;</li> <li>• Issue attendance reports to customer's organisations;</li> <li>• Inform quality assurance activities (i.e. course booking and online evaluation information).</li> </ul>	<p>In order to provide individuals with a good service and to make attendance at courses as comfortable as possible CEC may pass on some basic information (e.g. if you have special requirements) to the venue or course tutor.</p> <p>CEC will also issue attendance reports to customers. For certified / accredited courses, CEC may need to pass personal details to the accrediting / endorsing bodies to confirm attendances and verify eligibility / requirements to sit their exams.</p> <p>Course booking and evaluation information may be shared within HSC and with those parties who provide education on behalf of CEC.</p>	<ul style="list-style-type: none"> <li>• Performance of a contract (Article 6(1)(b))</li> </ul>
Corporate Services	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal addresses</li> <li>• Information relevant to Subject</li> </ul>	<p>Provision of information to individuals or organisations who submit Subject Access or Freedom of Information requests</p>	<p>Corporate Services may be required to provide personal information to</p>	<ul style="list-style-type: none"> <li>• Legal Obligation (Article</li> </ul>

	Access Requests, which may include 'special categories' of information such as medical and/or social care records	Investigation of complaints / whistleblowing disclosures submitted regarding BSO's functions	another statutory organisations (such as a police force, regulator or investigatory body) or by court order.	6(1)(c)
Counter Fraud and Probity Services (CFPS)	<ul style="list-style-type: none"> <li>Name</li> <li>Date of Birth</li> <li>Email / postal address</li> <li>National Insurance Number</li> <li>Staff Number</li> <li>Medical conditions</li> <li>Dental treatments, ophthalmic services/products, medication and pharmaceutical services provided, certain types of general medical services</li> <li>Social Care Records</li> <li>Financial Information</li> </ul>	<p>CFPS provides a broad range of support services to the HSC. Specifically, CFPS requires information for the following purposes:</p> <ul style="list-style-type: none"> <li>To prevent, detect and investigate potential, suspected and actual fraud, corruption and other financial irregularities against HSC (<b>Investigations</b>)</li> <li>To verify that individuals are entitled to registration with a GP (<b>NHS Eligibility</b>)</li> <li>To establish whether patients who have claimed for assistance with dental and ophthalmic treatment costs are eligible (<b>Patient Exemptions</b>)</li> <li>To provide an assurance to the Health and Social Care Board (HSCB) on the expenditure on Family Practitioner Services (FPS) via verification checks on claims submitted by the family practitioners (<b>Probity</b>)</li> <li>To establish whether day care facilities that have claimed eligibility for payment for milk reimbursement have entitlement to do so (<b>Day Care Foods Scheme</b>)</li> <li>To process valid vouchers under the <b>Healthy Start Scheme</b></li> </ul>	CFPS may be obliged to provide information to another statutory organisation (such as a Benefits Agency, Police Force, health regulator, investigatory body or Department of Health) or via a court order.	<ul style="list-style-type: none"> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article 6(1)(e))</li> </ul>
Equality	<ul style="list-style-type: none"> <li>Name</li> <li>Organisation</li> <li>Email / postal address</li> <li>Religious belief</li> <li>Political opinion</li> <li>Racial group</li> <li>Age</li> <li>Marital Status</li> <li>Sexual orientations</li> <li>Gender</li> </ul>	<p>The Equality Unit holds information on behalf of the BSO and the 10 regional HSC Organisations to support them on matters relating to equality, diversity and human rights.</p> <p>The Equality Unit may use this information to:</p> <ul style="list-style-type: none"> <li>Assist the regional organisations in their legal duty to promote equality of opportunity and good relations in carrying out their functions, and compliance with the Human Rights Act;</li> </ul>	<p>The Equality Unit may share their consultation list with the 11 organisations when they wish to consult and engage with groups and individuals on other policies and decisions.</p> <p>The Equality Unit may</p>	<ul style="list-style-type: none"> <li>Performance of a contract (Article 6(1)(b))</li> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article</li> </ul>

	<ul style="list-style-type: none"> <li>• Disability</li> <li>• Dependency status</li> </ul>	<ul style="list-style-type: none"> <li>• Contact individuals on consultation / engagement exercises and events relating to equality, diversity and human rights;</li> <li>• Enable individual's participation in BSO's Disability Work Placement Scheme;</li> <li>• Providing training to staff across the 11 organisations in matters relating to equality, diversity and human rights.</li> </ul>	also distribute delegation lists to teaching staff, and attendance reports to customers.	6(1)(e))
Family Practitioner Service (FPS)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Registration information</li> <li>• HSC service information</li> <li>• Superannuation</li> <li>• Maternity / paternity information.</li> <li>• National Insurance number</li> <li>• Details held in personnel files</li> <li>• Bank details</li> <li>• Passport information / status</li> <li>• Health Records</li> <li>• Social Care Records</li> <li>• Representative body details</li> </ul>	<p>FPS process information in relation to a range of statutory and contractual services they provide on behalf of HSCB and DoH. FPS is required to hold information in order to perform its contractual obligations.</p> <p>In addition to the above, information may also be processed in order to collate information relating to Regional Statistical Requirements, Health Planning Purposes and Honest Broker Service (HBS).</p> <p>The HBS has been established to enable non-identifiable information to be shared with other organisations, to maximise the uses and health service benefits which can be gained from it, including planning, commissioning of services and public health monitoring. For further information on HBS, please refer to the following link:  <a href="http://www.hscbusiness.hscni.net/services/2454.htm">http://www.hscbusiness.hscni.net/services/2454.htm</a></p>	FPS may be obliged to provide personal information to other internal departments (such as Counter Fraud and Probity), or another statutory organisation (such as a Dept. of Communities, Dept. of Finance, Dept. of Health, HMRC, Electoral Office NI, Health Trusts or NHSBSA).	<ul style="list-style-type: none"> <li>• Performance of a contract (Article 6(1)(b))</li> <li>• Legal Obligation (Article 6(1)(c))</li> <li>• Public Task (Article 6(1)(e))</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Registration information</li> <li>• HSC service information.</li> <li>• National Insurance number</li> <li>• Details held in personnel files</li> <li>• Bank details</li> </ul>	BSO Finance will process information in relation to statutory and contractual services they provide on behalf of the Northern Ireland Department of Health (DoH). Finance is required to hold information in order to perform its contractual obligations.	BSO Finance may also be obliged to provide personal information to other internal departments (such as Counter Fraud and Probity), or another statutory organisation	<ul style="list-style-type: none"> <li>• Performance of a contract (Article 6(1)(b))</li> <li>• Legal Obligation (Article 6(1)(c))</li> </ul>



	<ul style="list-style-type: none"> <li>• Passport information / status</li> <li>• Information concerning health and clinical treatment</li> </ul>		(such as DoH, HMRC, Health Trusts, Social Security Agencies and the Housing Executive).	<ul style="list-style-type: none"> <li>• Public Task (Article 6(1)(e))</li> </ul>
HSC Leadership Centre (HSCLC)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Employment details</li> <li>• Attendance information (e.g. programmes attended and results)</li> <li>• Disability / dietary details (if applicable)</li> </ul>	<p>HSCLC requires information in order to provide education to nurses, midwives and Allied Health Professionals and consultancy to the voluntary, community and independent sectors.</p> <p>Specifically, HSCLC requires this personal information to:</p> <ul style="list-style-type: none"> <li>• Contact individuals about matters arising from bookings / attendance at events;</li> <li>• Distribute a delegate list to teaching staff;</li> <li>• Issue attendance reports to customers organisations;</li> <li>• Inform quality assurance activities (i.e. course booking and online evaluation information).</li> </ul>	<p>In order to provide individuals with a good service and to make attendance at courses as comfortable as possible HSCLC may pass on some basic information (e.g. if you have special requirements) to the venue or course tutor.</p> <p>HSCLC will also issue attendance reports to customers. For certified / accredited courses, HSCLC may need to pass personal details to the accrediting / endorsing bodies to confirm attendances and verify eligibility / requirements to sit their exams.</p> <p>Course booking and evaluation information may be shared within HSC and with those parties who provide education on behalf of HSCLC.</p>	<ul style="list-style-type: none"> <li>• Performance of a contract (Article 6(1)(b))</li> </ul>
HSC Pension Service	<ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Email / postal address</li> </ul>	The HSC Pension Service administers the Pension Scheme across the HSC including Directional Bodies and GP Practices.	HSC Pension Service may be obliged to provide personal information to other statutory	<ul style="list-style-type: none"> <li>• Legal Obligation (Article 6(1)(c))</li> </ul>

	<ul style="list-style-type: none"> <li>• Telephone number</li> <li>• Relationship status</li> <li>• Dependent Children details</li> <li>• Employment details</li> <li>• Salary</li> <li>• Pensionable record including <ul style="list-style-type: none"> <li>○ Transferred pension details</li> <li>○ GMP details</li> <li>○ Additional Voluntary Contribution details</li> <li>○ Other pension related finances</li> </ul> </li> <li>• Maternity / paternity information.</li> <li>• National Insurance number</li> <li>• Bank details</li> <li>• Information concerning health</li> <li>• Sickness / absence/unpaid leave</li> </ul>	HSC Pension Service processes this information in order to fulfil this function. This includes calculation of pension benefits and pension lump sums.	organisations (such as HMRC, DoH, Government Actuary's Department, National Fraud Initiative, Health Trusts and the Public Services Ombudsman for Northern Ireland).	<ul style="list-style-type: none"> <li>• Public Task (Article 6(1)(e))</li> </ul>
Human Resources (HR)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Family details (e.g. next of kin)</li> <li>• Education</li> <li>• Training</li> <li>• Salary</li> <li>• Sickness / absence</li> <li>• Details held in personnel files</li> <li>• Religious beliefs</li> <li>• Racial / Ethnic Origin</li> <li>• Offences, criminal proceedings, outcomes and sentences</li> <li>• Trade Union membership</li> <li>• Employment tribunal applications</li> <li>• Complaints</li> <li>• Accidents / Incidents</li> </ul>	HR processes personal information for a range of purposes, including: <ul style="list-style-type: none"> <li>• Staff Administration;</li> <li>• Service improvement (i.e. staff satisfaction survey);</li> <li>• To ensure staff are adequately trained;</li> <li>• To conduct an investigation in response to a complaint or police enquiry;</li> <li>• Accounts and records, i.e. keeping accounts related to business activity, customers, financial management;</li> <li>• Health or scientific research;</li> <li>• Performance monitoring and analysis to help assess the quality and standard of our services;</li> <li>• Sharing and matching of personal information for national fraud initiative;</li> <li>• Statutory monitoring purposes.</li> </ul>	HR may also be obliged to provide personal information to other internal departments (such as Counter Fraud and Probity), or another statutory organisation (such as DoH, HMRC, Health Trusts, Social Security Agencies and the Housing Executive).	<ul style="list-style-type: none"> <li>• Performance of a contract (Article 6(1)(b))</li> <li>• Legal Obligation (Article 6(1)(c))</li> <li>• Public Task (Article 6(1)(e))</li> <li>• Legitimate Interests (Article 6(1)(f))</li> </ul>
Information	ITS processes a vast range of both	ITS hosts (and therefore acts as data processor) a	Although ITS acts as a	<ul style="list-style-type: none"> <li>• Legal</li> </ul>

<p>Technology Service (ITS)</p>	<p>personal information, and 'special categories' of personal information</p>	<p>vast range of information systems on behalf of HSC Organisations.</p>	<p>data processor, it may be required to provide personal information to another statutory organisation (such as a Police Force, Health Regulator or Investigatory Body), or via a Court Order.</p> <p>ITS will also share information (such as email to and from staff within HSC) as part of HR investigations, or to comply with obligations under data protection and freedom of information law.</p>	<p>Obligation (Article 6(1)(c))</p> <ul style="list-style-type: none"> <li>• Public Task (Article 6(1)(e))</li> </ul>
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<p>Internal Audit (IA)</p>	<ul style="list-style-type: none"> <li>• <b>Staff</b> (current / former / potential) - Demographic information including (but not limited to) Name, address, age, date of birth, National Insurance Number. Staff names (Trust or professional email addresses). Staff contact details – e.g. work email address, work telephone number. Staff training. Employment details (appraisal, employment status, leave, sickness).</li> <li>• <b>Service Users</b> (Adults / Children / Young People / Vulnerable Groups) - Demographic information including (but not limited to) Name, address, age, date of birth, hospital number or Health &amp; Care Number, National Insurance numbers, bank account details, Benefits information. Special Category information including health and / or social care information.</li> <li>• <b>Relatives/guardians</b> - Demographic information including (but not limited to) Name, address, age, date of birth.</li> <li>• <b>Business contacts/suppliers</b> - Demographic information including (but not limited to) Name, address.</li> <li>• <b>Complainants, correspondents, enquirers</b> - Demographic information including (but not limited to) Name, address, age, date of birth, hospital number or Health &amp; Care Number. Special Category information including health and / or social care information</li> </ul>	<p>Internal Audit is required to provide client Accounting Officers, , with an objective evaluation of and opinion on the overall adequacy and effectiveness of their organisation’s framework of governance, risk management and control.</p> <p>The Head of Internal Audit’s opinion is a key element of the framework of assurance that an Accounting Officer needs to inform the completion of the annual Governance Statement. The Governance Statement is required by the Northern Ireland DoH from each HSC organisation.</p> <p>Internal Audit conduct a risk based programme of audit assignments, on which the overall annual opinion is based. Access to personal data held by client organisations, relevant to each audit, is required in order to conduct each audit assignment.</p>	<p>Internal Audit does not routinely share any personal information it processes and/or collects with any other HSC or external organisation, except for that which may be necessary to share with the Northern Ireland Audit Office (NIAO) or their appointed representatives.</p> <p>However, BSO Internal Audit may need to engage 3rd party organisations (contracted by BSO Internal Audit on a call off basis from a framework contract) to conduct audits on their behalf. In such cases, these 3<sup>rd</sup> party organisations will be bound by strict contractual clauses.</p>	<p>GDPR Article 6(1)c: Legal Obligation.</p> <p>GDPR Article 6(1)e: Public interest / Exercise of Official Duty.</p> <p>GDPR Article 9(2) (h) and (i); Schedule 1, part 1, paragraph 2</p> <p>The Public Task Function is outlined in the Health &amp; Social Care (Reform) Act (NI) 2009</p>
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<p>Legal Services (DLS)</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Email / postal address</li> <li>Telephone number</li> <li>Family details (for example, next of kin)</li> <li>Employment details (for example, salary and HSC service information, sickness absence)</li> <li>Details held in personnel files</li> <li>Medical records</li> <li>Social care records</li> </ul>	<p>DLS is the sole provider of legal services for the Health and Social Care Sector (HSC) in Northern Ireland.</p> <p>DLS processes personal information in order to discharge its functions to its clients, and in line with legal obligations.</p>	<p>DLS may be obliged to provide personal information to another statutory organisation (such as a Police Force, Health Regulator or Investigatory Body), or via a Court Order.</p> <p>DLS may also share personal information obtained from clients with counsel, 3<sup>rd</sup> party solicitors, courts and experts in the course of managing legal issues, as part of legal processes.</p>	<ul style="list-style-type: none"> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article 6(1)(e))</li> </ul>
<p>Office for Research Ethics Committees Northern Ireland (ORECNI)</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Professional background and CV</li> <li>Email / postal address</li> <li>Telephone number</li> <li>Bank details</li> </ul>	<p>ORECNI processes personal information for the purposes of contacting volunteer committee members, as part of their role with ORECNI, including remuneration for expenses as appropriate.</p> <p>CVs of researchers / research teams are processed as part of the research application process.</p> <p>ORECNI does not process any patient or service user information.</p>	<p>CVs of researchers / research teams will be visible during audit by the Health Research Authority (England).</p> <p>ORECNI may also be obliged to provide personal information to another statutory organisation (such as a Police Force, Health Regulator or Investigatory Body), or via a Court Order.</p>	<ul style="list-style-type: none"> <li>Performance of a contract (Article 6(1)(b))</li> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article 6(1)(e))</li> </ul>
<p>Procurement and Logistics Service (PaLS)</p>	<ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Postal address</li> <li>Job Title</li> <li>Family Details including next of kin</li> <li>Telephone number</li> <li>Family details (e.g. next of kin)</li> <li>Parent Company Guarantee</li> </ul>	<p>PaLS is the sole centre of procurement expertise for Health and Social Care in Northern Ireland.</p> <p>PaLS processes personal information to facilitate its procurement and logistics functions in line with legal obligations.</p>	<p>PaLS may share this information with other HSC bodies and 3<sup>rd</sup> Party Contractors who comply with relevant data protection regulations.</p> <p>PaLS may be obliged to share this information with other statutory organisations such as</p>	<ul style="list-style-type: none"> <li>Performance of a contract (Article 6(1)(b))</li> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article 6(1)(e))</li> </ul>

			regulatory bodies, investigatory bodies, police forces including PSNI, Audit, HMRC, NIHE, non-statutory providers or via a court order	
Shared Services - Accounts Payable (APSS)	<ul style="list-style-type: none"> <li>Name</li> <li>Email / postal address</li> <li>Telephone number</li> <li>Bank details</li> </ul>	APSS has full responsibility for managing the payments function for all of HSC. APSS also processes personal information for HSC service users who submit expense claims (e.g. travel claims).	APSS may be obliged to provide personal information to another statutory organisation (such as a Police Force, Health Regulator or Investigatory Body), or via a Court Order.	<ul style="list-style-type: none"> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article 6(1)(e))</li> </ul>
Shared Services - Accounts Receivable (SSAR)	<ul style="list-style-type: none"> <li>Name</li> <li>Email / postal address</li> <li>Telephone number</li> <li>Date of Birth</li> <li>Bank details</li> <li>Family details (e.g. next of kin)</li> <li>Employment details (salary, HSC Service and absence information)</li> <li>Medical information (i.e. details of clinical procedures)</li> </ul>	<p>SSAR processes personal information provided by other HSC Organisations for the purposes of raising HSC invoices and for the recovery process of public money.</p> <p>Personal information is processed to:</p> <ul style="list-style-type: none"> <li>process invoices for goods or services and to ensure prompt recovery of HSC funds;</li> <li>ensure that money is used properly to pay for the services it provides;</li> <li>investigate complaints, legal claims or important incidents;</li> <li>detect and prevent fraud;</li> <li>make sure that BSO gives value for money.</li> </ul>	SSAR may be obliged to provide information to other bodies that inspect and manage public funds (for example, DoH, regulatory bodies, police forces) or via court order.	<ul style="list-style-type: none"> <li>Legal Obligation (Article 6(1)(c))</li> <li>Public Task (Article 6(1)(e))</li> </ul>
Shared Services – Interpreting (IS)	<p>Interpreters:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Date of Birth</li> <li>Email / postal address</li> <li>Telephone number</li> <li>Qualifications</li> <li>Right to work documentation</li> </ul>	<p>IS processes personal information provided by HSC Staff, Practitioners and Interpreters to ensure the efficient and effective management and delivery of its services, and in order to perform its service level agreement obligations.</p> <p>Personal information is processed for the purpose of</p>	<p>Personal information relating to patients / clients will be shared with interpreters in order to fulfil the service.</p> <p>IS may be required to</p>	

	<ul style="list-style-type: none"> <li>• Access NI checks</li> <li>• Proof of identity</li> <li>• Bank details</li> <li>• Complaints</li> </ul> <p>Patients / Clients:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Limited medical information</li> </ul>	<p>booking and delivering of interpreters, to ensure that the HSC can provide a safe, quality-assured, responsive and efficient service to patients / clients.</p> <p>Information may also be processed to investigate complaints, where a client and/or patient is unhappy with the service provided by an interpreter.</p>	<p>provide personal information to another statutory organisations (such as a police force, regulator or investigatory body) or by court order.</p>	
Shared Services – Payroll (PSC)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Date of Birth</li> <li>• Bank details</li> <li>• Family details (e.g. next of kin)</li> <li>• Employment details (salary, HSC Service and absence information)</li> </ul>	<p>PSC is responsible for the end to end processing of employee and payroll information, and manages all travel and subsistence claims, for the HSC.</p> <p>PSC therefore processes personal information for the purpose of discharging this function.</p>	<p>PSSC may be required to provide personal information to another statutory organisation (such as HMRC, a police force, regulator or investigatory body) or by court order.</p>	<ul style="list-style-type: none"> <li>• Performance of a contract (Article 6(1)(b))</li> <li>• Legal Obligation (Article 6(1)(c))</li> <li>• Public Task (Article 6(1)(e))</li> </ul>
Shared Services - Recruitment (RSSC)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email / postal address</li> <li>• Telephone number</li> <li>• Date of Birth</li> <li>• Gender</li> <li>• Marital Status</li> <li>• National Insurance Number</li> <li>• Work experience</li> <li>• Referee names and contact details</li> <li>• Education</li> <li>• Training</li> <li>• Professional Qualifications / Registration Status</li> <li>• Residency / Immigration Status</li> </ul>	<p>If an individual chooses to apply for a post within the HSC, they are required to complete an application form either online at <a href="http://www.hscrecruit.com">www.hscrecruit.com</a> or through submission of a hard copy. This information will be submitted to RSSC who are responsible for administering the Recruitment &amp; Selection Process in conjunction with the relevant HSC employing authority for the vacant post.</p> <p>As part of the shortlisting process, the panel responsible for the appointments process will need to review the information to help them understand an individual's qualifications and experience for the post and to ensure the essential criteria set out in the Personnel Specification is met. RSSC then use this</p>	<p>In submitting an application to a post, the employing authority for the post will have access to the information. This will be closely managed with only those who are required to see information in the context of their duties having such access. Typically this will include, but is not limited to, the panel responsible for the appointments process,</p>	<ul style="list-style-type: none"> <li>• Legal Obligation (Article 6(1)(c))</li> <li>• Legitimate Interests (Article 6(1)(f))</li> </ul>

	<ul style="list-style-type: none"> <li>• Community Background</li> <li>• Religious belief</li> <li>• Racial / Ethnic Origin</li> <li>• Nationality</li> <li>• Caring responsibilities</li> <li>• Disability</li> <li>• Sexual Orientation</li> <li>• Political opinion</li> </ul>	<p>information to facilitate advising an individual of the outcome of this stage, and for those who are successful at shortlisting to invite them to the next stage in the assessment process.</p> <p>Following the assessment process, RSSC will then use contact information to advise individuals of the outcome of assessment and for the person(s) who is/are successful in the appointment to commence the conditional offer and pre-employment checks process.</p> <p>As well as facilitating the application process, submitted applications become part of the 'applicant pool' for a post and information is used on an anonymised basis to inform the legal duties of the Data Controllers (the HSC employing authority) to monitor the applicant pool under Fair Employment legislation, including the 3 yearly Article 55 Review and fulfilment of Section 75 duties.</p> <p>In addition to the above, details of SARs, FOIs and Complaints may also be retained to monitor trends and best practice for the purpose of providing an efficient service, and for the purposes of organisational learning.</p>	<p>the Occupational Health Department, the Human Resources Department and the Equality Unit / Department.</p> <p>Individuals who make an application on line at <a href="http://www.hscrecruit.com">www.hscrecruit.com</a> should be aware that the E-recruitment System Suppliers (HCL) have access to information for purposes of Data testing for system accuracy purposes and fault resolution. Data testing is done on the live data set and can be accessed by Sunguard, HCL off shore Team (India) as well as HCL in the UK. No Data leaves the UK for this purpose but is accessed as part of the overall system maintenance arrangements. This access is controlled through Service Level Agreements / contract arrangements.</p> <p>There may be other occasions where RSSC have a legal duty to share personal information, such as in the instance of Industrial Tribunals.</p>	
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