

NHS Somerset Integrated Care Board Fair Processing/Privacy Notice

This privacy notice outlines how NHS Somerset Integrated Care Board (“the ICB”) uses your personal information when you contact us or use our services.

Our contact details

Name: NHS Somerset Integrated Care Board

Address: Wynford House, Lufton Way, Yeovil, BA22 8HR

General phone number: 01935 384000

General enquiries email address: somicb.enquiries@nhs.net

Website: <https://nhssomerset.nhs.uk/>

Somerset ICB is registered as a Data Controller with the Information Commissioner’s Office (ICO). Our registration number on the Data Protection Register is ZB363198 and our entry is located here: <https://ico.org.uk/ESDWebPages/Entry/ZB363198>

Data Protection Officer contact details

Our Data Protection Officer (DPO) is Kevin Caldwell, Head of Information Governance and Risk.

The DPO is responsible for monitoring our compliance with data protection requirements. You can contact them with queries or concerns relating to the use of your personal data by emailing: somicb.dataprotection@nhs.net

How do we get information and why do we have it?

We may collect personal information directly from you for one of the following reasons:

- you have sought funding for continuing health care or personal health budget support
- you have applied for a job with us or work for us
- you have signed up to our newsletter/patient participation group
- you have made a complaint
- you have used our Patient Advice and Liaison Service (PALS)

- you asked us for our help or involvement with your healthcare, or where we are required to fund specific specialised treatment for a particular condition that is not already covered in our contracts with organisations providing NHS care

We may also receive personal information about you indirectly from others, in the following scenarios:

- from other health and care organisations involved in your care so that we can assess your eligibility for Continuing Healthcare funding
- to assess and evaluate safeguarding concerns
- where you have asked us to look into an incident or complaint relating to another healthcare organisation

Additionally, we receive commissioning datasets from NHS Digital and through local data flows in anonymised or pseudonymised form. The data used may relate to primary care (such as activity from GP practices, dentists, optometrists, etc.) or secondary care (acute, community or mental health services).

What information do we collect?

Personal information

We currently collect and use the following personal information:

- personal identifiers and contact details (for example, name and contact details)
- photographic identity (photo ID) (for example, photographs of staff for ID badge, ID verification for subject access requests)

More sensitive information

We may process the following more sensitive data (including special category data):

- data concerning physical or mental health (for example, Continuing Health Care records)
- data revealing racial or ethnic origin
- data concerning a person's sex life
- data concerning a person's sexual orientation
- genetic data (for example, details about a DNA sample taken from you as part of a genetic clinical service)
- biometric data (where used for identification purposes)
- data revealing religious or philosophical beliefs
- data relating to criminal or suspected criminal offences

Who do we share information with?

We may share information with the following types of organisations:

- third party data processors (such as IT systems suppliers)
- health and social care provider organisations (such as Somerset NHS Foundation Trust)

In some circumstances we are legally obliged to share information. This includes:

- when required by NHS England to develop national IT and data services
- when reporting some infectious diseases
- when a court orders us to do so
- where a public inquiry requires the information

We will also share information if the public good outweighs your right to confidentiality. This could include:

- where a serious crime has been committed
- where there are serious risks to the public or staff
- to protect children or vulnerable adults

We may also process your information in order to de-identify it, so that it can be used for purposes beyond your individual care, whilst maintaining your confidentiality. These purposes will include to comply with the law and for public interest reasons.

Is information transferred outside the UK?

Your information will not be sent outside of the United Kingdom or European Economic Area (EEA) where the laws do not protect your privacy to the same extent as the law in the UK unless we are satisfied that equivalent arrangements exist to provide the same level of security as would otherwise be found in the EEA. We will never sell any information about you.

If we send information outside of the UK or European Economic Area (EEA), we will explain this within the Processing Activities section of this notice.

What is our lawful basis for using information?

Personal information

Under the UK General Data Protection Regulation (UK GDPR), we may rely on one of the following Article 6 legal bases when processing personal data:

(a) We have your consent - this must be freely given, specific, informed and unambiguous.

(b) We have a contractual obligation - between a person and a service, such as a service user and privately funded care home.

(c) We have a legal obligation - the law requires us to do this, for example where NHS England or the courts use their powers to require the data. See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

(e) We need it to perform a public task - a public body, such as an NHS organisation or Care Quality Commission (CQC) registered social care organisation, is required to undertake particular activities by law. See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

(f) We have a legitimate interest - for example, a private care provider making attempts to resolve an outstanding debt for one of its service users.

Please see a breakdown of the processing activities that we undertake at Appendix 1 of this Privacy Notice; this identifies the Article 6 legal basis for specific ICB functions.

More sensitive data

For 'special category data', such as data concerning health and care, we require a GDPR Article 9 legal basis for processing it. As an NHS ICB, we are likely to be processing special category data under one of the following lawful bases:

(b) We need it for employment, social security and social protection reasons (if authorised by law). See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

(f) We need for a legal claim or the courts require it.

(g) There is a substantial public interest (with a basis in law). See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

(h) To provide and manage health or social care (with a basis in law). See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

(i) To manage public health (with a basis in law). See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

(j) For Archiving, research and statistics (with a basis in law). See [this list](#) for the most likely laws that apply when using and sharing information in health and care.

Please see a breakdown of the processing activities that we undertake at Appendix 1 of this Privacy Notice; this identifies the Article 9 legal basis for specific ICB functions (where applicable).

Common law duty of confidentiality

Where we hold confidential health and care information, we will only disclose this in particular circumstances; which may include:

- where you have provided us with your consent
- where we have support from the Secretary of State for Health and Care following an application to the [Confidentiality Advisory Group \(CAG\)](#) who are satisfied that it isn't possible or practical to seek consent
- where we have a legal requirement to collect, use and share the data
- for specific individual cases, where we have assessed that the public interest to share the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime). This will always be considered on a case-by-case basis, with careful assessment of whether it is appropriate to share the particular information, balanced against the public interest in maintaining a confidential health service

How do we store your personal information?

Your information is securely stored for the time periods specified in the [Records Management Code of Practice](#). We will then dispose of the information as recommended by the Records Management Code; for example, we will:

- securely dispose of your information by shredding paper records, or wiping hard drives to legal standards of destruction
- archive your information at a secure paper records storage facility

What are your data protection rights?

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information (known as a [subject access request](#)).

Your right to rectification - You have the right to ask us to [rectify personal information](#) you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at somicb.dataprotection@nhs.net if you wish to make a request.

National data opt-out

You have the right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered. Any individual has the right to register for a national data opt-out, to make such a request, please follow the link <https://digital.nhs.uk/services/national-data-opt-out>

NHS Somerset ICB meets the requirements of the National Data Opt-out Policy. A copy of the ICB National Data Opt Out checklist is available upon request from us via somicb.dataprotection@nhs.net

These are commitments set out in the NHS Constitution, for further information please visit <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

You can contact us via the details provided in this privacy notice if you have any questions or concerns about your data protection rights. We will discuss alternative arrangements you can make and explain the consequences

How do I complain?

If you have any concerns about our use of your personal information, you can make a complaint to us at somicb.dataprotection@nhs.net

Following this, if you are still unhappy with how we have used your data, you can then complain to the ICO.

The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Version Control and Date of Last Review

This is version 2 of the NHS Somerset ICB Privacy Notice. It was approved by the ICB's Information Governance, Records Management and Caldicott Committee on 24/04/2024.

Appendix 1 – Processing Activities/ICB Functions

The following table provides some detail about the functions that the ICB undertakes and the personal data that we process in order to deliver them.

Activity/Function	Type and Nature of Personal Data Processed	Purpose for Processing Personal Data	Article 6 Legal Basis	Article 9 Legal Basis
Complaints	<p>When we receive a complaint from a person we create a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.</p> <p>We will only use the personal information we collect to process the complaint and to check on the level of service being provided. We may need to seek your written authority to access your information from other service providers, such as hospitals, GP practices or clinics.</p> <p>We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying them to be disclosed, we will try to respect that; however, it may not be possible to handle a complaint on an anonymous basis.</p>	To identify you and to investigate/assist with your complaint	<p>6(1)(e) – Public task</p> <p>The ICB has a duty as to the improvement in quality of services under Section 14R NHS Act 2006</p> <p>To satisfy the Common Law Duty of Confidentiality, will seek your consent to share your personal data with, and access your personal data from, members of the public and/or organisations in the process of handling your complaint</p>	9(2)(h) – Provision of health systems and services

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<p>Evidence-Based Intervention (EBI)</p>	<p>We will collect and process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our contracts with providers.</p> <p>This may be called an “Evidence Based Intervention” (EBI).</p> <p>Where an application is received from a clinician on your behalf for an EBI procedure or treatment, the EBI team within the ICB will create a case file relating to you with details recorded in a database. The information collected will be the minimum needed to support your application and will be provided by the clinician who refers you.</p> <p>We will keep personal information relating to EBI applications in line with national guidance on records management as set out in the NHS Records Management Code of Practice. For EBI files, we currently retain records for 8 years following conclusion of the application process.</p> <p>The clinical professional who first identifies that you may need the treatment will explain to you the information that we need to collect and process in order for us to assess your needs and commission your care, and gain your agreement to proceed with an application.</p>	<p>To assess your application for treatment not already covered in our contracts with providers</p>	<p>6(1)(e) – Public task</p>	<p>9(2)(h) – Provision of health systems and services</p>

Activity/Function	Type and Nature of Personal Data Processed	Purpose for Processing Personal Data	Article 6 Legal Basis	Article 9 Legal Basis
Continuing Healthcare (CHC)	We will collect and process your identifiable information where you have asked us to undertake assessments for Continuing Healthcare (a package of care for those with complex medical needs) and commission resulting care packages.	To assess your needs and commission your care	6(1)(e) – Public task	9(2)(h) – Provision of health systems and services
Safeguarding	Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It is key in providing high-quality health and social care. The ICB, as an NHS statutory organisation, has a duty to participate in Serious Case Reviews for children and adults and Domestic Homicide Reviews undertaken by either the local Children's Partnership Safeguarding Boards, the Adult Safeguarding Boards or the Community Safety Partnership for continued learning, to minimize risk and to improve services.	To assess and evaluate any safeguarding concerns	6(1)(e) – Public task The ICB has a statutory responsibility under the Children Act 2004, Care Act 2014 and safeguarding provision within the Data Protection Act 2018 – Schedule 1, Part 2, subsections 18 and 19 to ensure the safety of all children, and the safety of adults at risk of abuse and neglect	9(2)(h) – Provision of health systems and services
Summary Care Record	The NHS uses an electronic record called the Summary Care Record (SCR) to support patient care. The SCR is a copy of key information from your GP record. It provides authorised care professionals with faster, secure access to essential information about you when you need care. Whenever a care professional accesses your SCR a log is kept.	Designated members of staff within the ICB carrying out specific roles have appropriate access to the Summary	6(1)(e) – Public task	9(2)(h) – Provision of health systems and services

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		Care Record to enable them to fulfil their duties. These roles are: <ul style="list-style-type: none"> • Home Oxygen Service • Individual Funding Applications • Finance - Invoice validation 		
Population Health Management	<p>The ICB will use Pseudonymised data to analyse and understand the local population needs, so that support and services can be provided where they will have the greatest impact.</p> <p>GPs use personal data to identify patients who are at risk of developing certain conditions, to enable the offer of a preventative service to them.</p>	Health and care service providers across Somerset work together as 'Integrated Care Systems' (ICS) and are sharing data to: <ul style="list-style-type: none"> • Understand the health and care needs of the care system's population, including health inequalities • Provide support to where it will have the most impact 	6(1)(e) – Public task	9(2)(h) – Provision of health systems and services

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		<ul style="list-style-type: none"> Identify early actions to keep people well, not only focusing on people in direct contact with services but, looking to join up care across different partners. 		
<p>Risk Stratification</p>	<p>Risk stratification is a process for identifying and managing patients who are at high risk of emergency hospital admission.</p> <p>NHS England encourages ICBs and GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions (such as Chronic Obstructive Pulmonary Disease) and to help and prevent avoidable admissions.</p> <p>Knowledge of the risk profile of our population will help the ICB to commission appropriate preventative services and to promote quality improvement in collaboration with our GP practices.</p> <p>This data is also shared with the Symphony project, a project which enables general practices and hospital services to work together and implement new models of care, such as enhanced primary care.</p>	<p>To identify and manage patients who are at high risk of emergency hospital admission</p>	<p>6(1)(e) – Public task</p> <p>We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality.</p> <p>The use of identifiable data by ICBs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the</p>	<p>9(2)(h) – Provision of health systems and services</p>

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	<p>Further information is available at: https://www.symphonyhealthcareservices.com/about-us/</p> <p>The ICB commissions third party analytic partners to conduct risk stratification on behalf of itself and its GP practices. Third party suppliers use algorithms to analyse the data in pseudonymised form to produce a risk score for individuals.</p>		<p>Health Research Authority.</p> <p>A section 251 exemption enables us to process patient identifiable information without patient consent, for the purposes of risk stratification.</p>	
<p>Invoice Validation</p>	<p>A small amount of information that could identify you is used within a secure area, known as a Controlled Environment for Finance (CEfF), so that the organisations that have provided you with care/treatment are reimbursed correctly. This is known as Invoice Validation.</p> <p>NHS Shared Business Services (SBS), based in Wakefield, are involved in the processing of the majority of our invoices on a daily basis. SBS provides this service via a contract with NHS England, which requires them to meet information governance standards – see Data Security and Protection Toolkit. You can find out more about them here: https://www.sbs.nhs.uk/</p>	<p>To ensure that we are paying the right organisation the right amount for the right service(s) to the right people.</p>	<p>6(1)(e) – Public task</p> <p>A Section 251 exemption enables us to process patient identifiable information without patient consent for the purposes of invoice validation.</p> <p>Section 251 applications are approved by the Secretary of State for Health, who imposes very tight conditions on what information</p>	<p>9(2)(h) – Provision of health systems and services</p>

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	<p>SBS receive invoices from suppliers of goods and services to process on behalf of the ICB. They do not require, and should not receive, any patient confidential data to do this.</p> <p>For other invoices, the invoice validation process may currently involve us occasionally using your name or initials. Where possible, we use GP Practice codes (each GP Practice has one and use of this confirms services are being provided to our patients) and/or another agreed identifier which does not include personal confidential data.</p> <p>Commissioners, like Somerset ICB, have a duty to detect, report and investigate any incidents where there has been a breach of confidentiality. If we receive any invoices with personal confidential data on, we have a responsibility to work with suppliers to ensure that invoices from them do not breach patient confidentiality.</p> <p>NHS England has published guidance on how invoices must be processed: https://www.england.nhs.uk/ourwork/tsd/ig/in-val/invoice-validation-faqs/</p>		<p>can be processed and by whom.</p> <p>On behalf of ICBs, NHS England made a Section 251 application, which was approved by the Secretary of Health for invoice validation, and extended until September 2024 to allow time for systems to be established to ensure that personal confidential data is processed lawfully.</p>	

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<p>Patient and Public Involvement</p>	<p>If you have asked us to keep you informed and up to date about the work of the ICB or if you are actively involved in our engagement and consultation activities or patient participation groups, we will collect and process personal confidential data which you share with us.</p> <p>Where you submit your details to us for involvement purposes, we will only use your information for this purpose. You can opt out at any time by contacting us using our contact details in this notice.</p>	<p>To provide you with information about the work of the ICB and receive your feedback, with your consent.</p>	<p>6(1)(a) - Consent</p>	<p>9(2)(a) - Consent</p>
<p>Commissioning</p>	<p>Hospitals and community organisations that provide NHS-funded care must submit certain information to NHS England about the services that they provide to patients.</p> <p>This information is generally known as commissioning datasets. The ICB obtains these datasets from NHS England and they relate to service users registered with GP Practices in Somerset. The datasets include information about the service users who have received care and treatment from those services that NHS Somerset ICB is responsible for funding.</p> <p>These datasets are then used in a format that does not directly identify you, for wider NHS purposes such as managing and funding the NHS, monitoring activity to understand and plan the health needs of</p>	<p>To help us understand the health and care needs of our patient population, so that we can plan and buy services to meet those needs.</p>	<p>6(1)(e) – Public task</p>	<p>9(2)(h) – Provision of health systems and services</p>

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	<p>the population, and to gain evidence that will improve health and care through research.</p> <p>The ICB is unable to identify you from these datasets. They do not include your name, home address, NHS number, post code or date of birth. However, information such as your age, ethnicity and gender, as well as coded information about any clinic or accident and emergency attendances, hospital admissions and treatment will be included.</p> <p>We are obliged to follow specific terms, conditions and security controls when using these commissioning datasets.</p> <p>We also receive similar information, that does not identify you, from GP Practices within our ICB. We use these datasets for purposes such as:</p> <ul style="list-style-type: none"> • performance managing contracts • reviewing the care delivered by providers to ensure quality and cost effective care • to prepare statistics on NHS performance to understand health needs and support service re-design, modernisation and improvement • to help us plan future services to ensure they meet our local population needs • to reconcile claims for payments for services received in your GP Practice • to audit NHS accounts and services 			

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	<p>If you do not wish for your information to be included in these datasets, even though it does not directly identify you to us, please contact your GP Practice and they can apply a code to your records that will stop your information from being included.</p>			
<p>Pharmacy, Opticians and Dental (POD)</p>	<p>From 1 April 2023, the ICB has taken on delegated responsibility for pharmaceutical, general ophthalmic and dental (POD) services. In carrying out these responsibilities we will process personal information about contractors, clinicians and in certain cases patients (e.g. complaints).</p>	<p>We require this information to perform a number of activities including Contract management, recruitments, complaints handling and financial management.</p>	<p>6(1)(e) – Public task</p>	<p>9(2)(h) – Provision of health systems and services</p>
<p>National Fraud Initiative</p>	<p>NHS Somerset ICB is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for; auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud.</p> <p>We participate in the Cabinet Office’s National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide specific sets of data to the Minister for the Cabinet Office for matching for each exercise, as detailed at:</p>	<p>To meet our legal obligations in respect of providing information to the Cabinet Office, as part of the National Fraud Initiative</p>	<p>6(1)(c) – Legal obligation</p>	<p>N/A</p>

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	<p>https://www.gov.uk/government/collections/national-fraud-initiative</p> <p>The Cabinet Office conducts data matching exercises to assist in the prevention and detection of fraud as part of its responsibility for public sector efficiency and reform. Part 6 of the Local Audit and Accountability Act 2014 enables the Cabinet Office to process data as part of the National Fraud Initiative (NFI).</p> <p>Data matching involves comparing sets of data, such as payroll, held by one body, against other records held by the same or another body to see how far they match. This is usually personal information and ICB creditors' data. The data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.</p> <p>Further information on the Government National Fraud Initiative may be found by reference to the following: https://www.gov.uk/government/publications/fair-processing-national-fraudinitiative/fair-processing-level-3-full-text</p>			

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National Registries	National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.	To meet our obligations in respect of maintaining National Registries	6(1)(e) – Public task	9(2)(h) – Provision of health systems and services
Employment	Personal data, including special categories, is processed for the purpose of fulfilment of employment contracts between employees and the ICB. This includes, but is not limited to, activity covering payroll, publication of employee declarations of interest, performance management, staff appraisal, training, occupational health and workforce reporting.	Management of employees	6(1)(b) – Performance of a contract	9(2)(b) – Obligations and rights of the controller in the field of employment
Freedom of Information Requests	Where we receive a request from you under the Freedom of Information Act 2000, we will use your name and correspondence address to discuss your request with you and to provide a response.	To fulfil our obligations under the Freedom of Information Act 2000	6(1)(c) – Legal obligation	N/A
Data Protection Rights/Requests	Where you have contacted us to exercise any of your rights under GDPR, we will use the information that you have provided to verify your identity, locate your personal data, and to assess and respond to your request. We will require evidence to prove your identity and entitlement to receive your personal data.	To fulfil our obligations under GDPR	6(1)(c) – Legal obligation	9(2)(h) – Provision of health systems and services

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<p>For Other organisations to provide support services for us</p>	<p>We have entered into contracts with other NHS and third-party organisations to provide some services for us or on our behalf.</p> <p>Where these organisations process personal data on our behalf, they are known as “data processors”, in accordance with GDPR.</p> <p>Below are details of our data processors and the function that they carry out on our behalf:</p> <ul style="list-style-type: none"> • NHS South, Central and West Commissioning Support Unit: Risk Stratification, Invoice Validation, Commissioning Intelligence analysis (add value to the analyses of data that does not directly identify individuals) • NHS Bristol, North Somerset and South Gloucestershire ICB (shared services) • Grant Thornton LLP (External auditor): Audit our accounts and services with specific case reviews from time to time (add value to the analyses of data that does not directly identify individuals) • BDO LLP (Internal auditor): Audit our accounts and services with specific case reviews from time to time • TIAA Ltd: Counter Fraud investigations and audits • NHS Resolution – Claims Management 	<p>These organisations are subject to the same legal rules and conditions for keeping personal confidential data and secure and are underpinned by a contract with us.</p> <p>Before awarding any contract, we ensure that organisations will look after your information to the same high standards that we do.</p> <p>Those organisations can only use your information for the service we have contracted them for and cannot use it for any other purpose.</p>	<p>6(1)(e) – Public task</p>	<p>9(2)(h) – Provision of health systems and services</p>

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	<ul style="list-style-type: none"> • Shred It - Confidential Waste Disposal Company to shred information in a secure environment • NHS Shared Business Service –Invoice Validation (see section above) • Somerset County Council – Jointly commission services, safeguarding • Somerset Partnership NHS Foundation Trust – Payroll services • University of York – economic evaluation of pseudonymised data • Prescribing Services Ltd – risk stratification – medicines management 			