

Health and Social Care Northern Ireland

Data Controller and Data Processing Memorandum of Understanding (MoU)

Issued under Article 28(3) of the General Data Protection Regulation ('GDPR')

BETWEEN

The Health and Social Care organisations set out in Appendix 21 ('The HSC Clients')

AND

The Business Services Organisation (BSO)

In Support of the Service Level Agreements (SLAs) between BSO and the HSC Clients

This Agreement is made on: 15/11/2021

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1 Background Information

The HSC Clients and BSO have entered into a series of SLAs, which requires the processing of personal data for the purposes specified within these SLAs. This agreement neither overrides nor replaces the main service level agreement, but instead is an addendum to it.

Because the Health and Social Care (Northern Ireland) (HSC) requires BSO to process personal data, DPA 2018 is engaged. This establishes BSO as the Data Processor who is processing personal data on behalf of the HSC Clients, who are the Data Controllers¹ and legally responsible for that data processing under the Act.

2 Scope

This agreement must include clear written instruction on:

- what personal information is to be processed, and what BSO is permitted to do with this personal data;
- what security measures must be in place to protect the personal data;
- what procedures must be followed if there is a security breach (incident); and
- any other arrangements i.e. sub-agreementing, termination of agreement etc. that need to be included to secure and control the data

3 Responsibilities

3.1 Data Controllers

DPA 2018 and GDPR require a data controller, when using the services of another organisation or company to process personal data on their behalf, to “use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of [DPA 2018 and GDPR] and ensure the protection of the rights of the data subject”

As data controllers, the HSC Clients remain legally responsible for the data processing carried out, and are responsible for:

- ensuring the personal data that they hold is processed fairly and lawfully and in accordance with DPA 2018 and GDPR;
- taking steps to ensure that this personal data remains protected, and that the liabilities and risks are appropriately managed.

The HSC Clients shall not instruct BSO to process personal data on their behalf under this agreement where they do not have a secure basis in law to process that data or to process the data in a manner which is outside the legislative framework existing at that time.

¹ It is recognised that in some instances The BSO and The HSC Clients may be joint data controllers, in line with conditions set out within GDPR Article 26. Further, in some instances it is anticipated that both BSO and The HSC Clients will operate as data controllers in their own right (also termed ‘data controllers in common’). Please see Appendix 1 for further definitions.

The HSC Clients are entitled during the term of this agreement, to require BSO to provide annual assurance, via Internal Audit, that the technical and organisational security measures adequately protect the personal data it is agreed to process. This includes the entitlement to audit BSO's premises, systems, procedures, documents and staff as may be desirable or necessary to ensure compliance with this agreement, the service agreement and/or with the law. A reciprocal arrangement may be agreed from time to time to ensure confidence in the end to end processing of data.

3.2 Data Processor

BSO, as the Data Processor shall at all times process personal data only as instructed to do so by the HSC Clients, for the purposes set out in Appendices 2 to 20 below and in accordance with data protection principles.

BSO shall have in place appropriate technical and organisational security measures that protect the personal data it has agreed to process on behalf of the HSC Clients from unauthorised or unlawful processing, accidental loss, destruction or damage. The BSO will work towards achieving ISO 27001 accreditation for Information Security.

BSO shall provide reasonable assurances and guarantees to the HSC Clients that those technical and organisational security measures in place are both appropriate and effective in protecting the processing of personal data.

BSO shall not share the personal data with any third party, outside of the HSC Clients and DoH, without the prior written permission of the HSC Clients, unless required to do so by law, or process personal data in any way or for any purpose that has not been instructed and authorised by the HSC Clients. Where required by law to share personal data with a third party, BSO shall inform the HSC Clients of that legal requirement before processing, unless the law prohibits such information on important grounds of public interest.

Neither shall BSO sub-agreement a third party to process the HSC Clients' personal data without their prior knowledge and written agreement, and only then having provided all the necessary assurance and guarantees of their adequate organisational and technical security measures.

BSO shall not transfer personal data to any third country, unless the conditions set out in GDPR (Chapter 5) are complied with

4 Data Security Requirements

Having regard to the state of technological development and to the cost of implementing any measures, BSO shall provide a level of security (including appropriate technical and organisational measures) appropriate to the harm that might result from unauthorised or unlawful processing of personal data or the accidental loss, damage or destruction of personal data and the nature of that personal data

Specifically, BSO shall ensure and provide evidence that:

- Access to the personal data is limited to those employees who need access to meet the Data Processor's obligations under this agreement;
- Staff have received appropriate training in data protection prior to their use of the personal data;
- Staff have signed a written undertaking, via contract of employment, that they understand and will act in accordance with their responsibilities for confidentiality;
- It has properly configured access rights for its staff, including a well-defined starters and leavers process to ensure appropriate access control;
- Suitable and effective authentication processes are established and used to protect personal data;
- Personal data is backed up on a regular basis and that any back up data is subject to vigorous security measures as necessary to protect the availability, integrity and confidentiality of the data;
- Robust and tested business continuity measures are in place to protect the confidentiality, integrity and availability of the Customer's personal data;
- Data transferred electronically is encrypted in accordance with national standards;
- Staff are not able to access the data remotely e.g. from home or via their own electronic device or internet portal other than through a secure electronic network and in accordance with organisational remote working policy, and that no data shall be stored in such devices;
- Data that requires disposal is disposed of securely and confidentially in accordance with the secure destruction requirements specified in section 6.

5 Information Breach Management / Reporting

BSO shall have procedures in place to monitor access and to identify unauthorised and unlawful access and use of personal data.

BSO shall report any breaches of personal information, including cybersecurity incidents, to the Data Protection Officer (DPO) of the client organisation immediately, and not later than 24 hours after becoming aware of it. BSO shall also immediately report any serious personal information security incident in accordance with the HSCNI Serious Adverse Incident Process.

BSO will also fully cooperate with the HSC Clients' incident investigation requirements.

The HSC Clients will ensure that appropriate internal escalation processes regarding such alerts are in place and operating effectively.

In so far as the HSC Clients are responsible for personal data, it is their responsibility to ensure that the incident is reported to the Information Commissioner's Office (ICO) and data subjects in accordance with legislation and the Adverse Incident Process as appropriate. Further, it is the responsibility of the client organisation to report any cybersecurity incidents to The National Cyber Security Centre (NCSC). BSO must provide a full investigation and details of the incident to the client organisations within the NIS Timeframes to enable this.

6 Secure Destruction

BSO shall ensure that personal data is disposed of securely and appropriately when no longer required, and in accordance with the data controller's retention and disposal schedule².

Personal data held in paper form (regardless of whether originally provided by the HSC Clients or subsequently printed) will be destroyed using a cross-cut shredder or sub-agreement to a confidential waste company that complies with industry standards.

Electronic storage media used to hold or process information will be destroyed or overwritten to current National Cyber Security Centre (NCSC) guidance .

In the event of any bad or unusable sectors that cannot be overwritten, BSO shall ensure complete and irretrievable destruction of the media itself.

BSO shall provide the Data Controller with copies of all relevant overwriting verification reports and/or certificates of secure destruction of personal data at the conclusion of the agreement.

7 Review and Monitoring of MOU

This document should be reviewed annually. This should include a review of the availability, security and integrity of the ICT Infrastructure Services and Application Services³.

Performance against this MoU will be monitored bi-annually through Contract Review meetings. This will be monitored against agreed Key Performance Indicators which will be agreed between the Trust / ALB and BSO.

8 Process for agreeing variations

Any variation to the terms of this agreement shall be agreed in writing by the parties and in accordance with the agreement management conditions set out in the SLAs.

² <https://www.health-ni.gov.uk/topics/good-management-good-records>

³ Refer to Appendix 1 of BSO IT Services SLAs and Appendix 10 of this document

9 Dispute resolution process

Both parties shall aim to resolve all disputes, differences and questions by means of co-operation and consultation and in accordance with the dispute resolution process specified in the SLAs.

Where disputes cannot be resolved via the above means, either party may refer the matter to the Department of Health (DoH) for determination, in line with Article 8 of The Health and Personal Social Services (Northern Ireland) Order 1991

10 Exit from agreement

In the event of termination of agreement in regard to any of the services provided by BSO, BSO agrees to:

- To store and process personal data securely, and destroy it confidentially when it is no longer necessary and instructed by the HSC Clients;
- To return to the HSC Clients any personal data held at the end of the agreement, ensuring secure transfer, or to make arrangements for its secure disposal upon the instruction of the HSC Clients

Data Processing Agreement between The HSC Client and BSO

On behalf of The HSC Client:

Signed 

Name : Brieg Donaghy, Chief Executive RQIA

(Print name & position of authorised signatory)

Date: 14 March 2022

On behalf of BSO:

Signed: 

Name: Karen Bailey
Position: Interim BSO Chief Executive
Date: 18/11/2021

Appendix 1: Definitions

Personal data: (GDPR, Article 4) “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”

Data Controller: (GDPR, Article 4) “the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law”

Data Processor: (GDPR, Article 4) “a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller”

Joint Data Controller: (GDPR, Article 26) “Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers”. This covers a situation where the determination is exercised by data controllers acting together, typically with written agreements setting out the purposes for processing, the manner of processing and the means by which joint data controller responsibilities will be satisfied.

Data controller in common is not defined within DPA 2018 and GDPR, but refers to where two or more data controllers share a pool of personal data often disclosing data to each other but with each processing the data independently of the other. Each needs to exercise due diligence in ensuring that all parties involved are meeting their requirement of the law.

Data Processing: (GDPR, Article 4) “any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”

Appendix 2: Clinical Education Centre (CEC) and HSC Leadership Centre (HSCLC)

Purpose: The CEC & HSCLC provide an education service to nurses, midwives and allied health professionals across HSC, and consultancy services to the voluntary, community and independent sectors.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email & postal address • Telephone number • Employment details • Attendance information (e.g. programmes attended and results) • Disability / dietary details (if applicable) 	<ul style="list-style-type: none"> • Contact individuals about matters arising from bookings / attendance at events; • Distribute a delegate list and information such as special requirements to teaching staff; • Deliver training; • Issue attendance reports to client organisations • Engage with external suppliers to deliver training as required 	<ul style="list-style-type: none"> • Contact trainees to help inform internal quality assurance activities (i.e. course booking and online evaluation information); 	<ul style="list-style-type: none"> • 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. • CEC & HSCLC may use external suppliers to deliver training • Oasis to store / retrieve archived documentation

Appendix 3: Corporate Services

Purpose: BSO Corporate Services provide Information Governance, Estates and Health and Safety services to some HSC Clients. In relation to the processing of personal information, BSO Corporate Services provides the following functions:

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email & postal address • Telephone number • Identification • Photographs • Information relevant to subject access requests, across the range of BSO's Services 	<ul style="list-style-type: none"> • Process information requests submitted under DPA and FOI legislation; • Provide a bespoke 'data protection officer service' • Manage information security incidents; • Manage health & safety incidents; • Workstation / Desktop Screen Equipment Assessments • Produce identification badges and maintain access controls associated with these (PHA and HSCB only) 	<ul style="list-style-type: none"> • Produce internal performance reports 	<ul style="list-style-type: none"> • Oasis to store / retrieve archived documentation • H&J Martin (ICO Registration Number Z3646757)

Appendix 4: Counter Fraud & Probity Services (CFPS)

Purpose: CFPS provides a broad range of support services to the HSC in relation to the prevention, detection and investigation of fraud, corruption and other financial irregularities.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Date of Birth • Email / postal address • National Insurance Number • Staff Number • Medical conditions • Dental treatments, ophthalmic services/products, medication and pharmaceutical services provided, certain types of general medical services • Social Care Records • Financial Information 	<ul style="list-style-type: none"> • Assessment of eligibility of individuals to receive treatment under the NHS • Assessment of eligibility of individuals to received assistance with dental & ophthalmic treatments costs • Entitlement under the Day Care Foods Scheme • Processing of vouchers under the Healthy Start Scheme • Post Payment Verification (including record reviews, checking clinics and contact with patients) 	<ul style="list-style-type: none"> • Investigations into concerns received (whistleblowing, professional concerns and referrals from other bodies) 	<ul style="list-style-type: none"> • CFPS will engage with The Department of Social Protection (DSP) Ireland to assess eligibility for treatment under the NHS • Oasis to store / retrieve archived documentation

Appendix 5: Equality Unit

Purpose: The Equality Unit holds information on behalf of its client organisations to support them on matters relating to equality, diversity and human rights

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Organisation • Email / postal address • Religious belief • Political opinion • Racial group • Age • Marital Status • Sexual orientations • Gender • Disability • Dependency status 	<ul style="list-style-type: none"> • Conduct public consultation exercises on behalf of clients collaboratively where agreed, to include the management of the consultation process and the provision of feedback to consultees • Gather information relevant to equality across client organisations to produce annual reports • Facilitate training across clients 	<ul style="list-style-type: none"> • Contact individuals on consultation / engagement exercises and events relating to equality, diversity and human rights 	<ul style="list-style-type: none"> • Oasis to store / retrieve archived documentation

Appendix 6: Family Practitioner Service (FPS)

Purpose: FPS process information in relation to a range of statutory and contractual services they provide on behalf of HSCB and DoH. FPS also processes information in order to collate information relating to regional statistical requirements, health planning purposes and the honest broker service.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Registration information • HSC service information • Superannuation • Maternity / paternity information • National Insurance number • Details held in personnel files • Bank details • Passport information / status • Health Records • Social Care Records • Representative body details 	<ul style="list-style-type: none"> • Validation and processing for payment of all General Dental, Pharmaceutical & Ophthalmic Services claims • Processing and validation of payments to contractors, salaried dental services and tendered dental services • Processing Requests for Prior Approval of Treatment, including administration of pre-treatment examinations • Refund of patient charges • Document storage and retrieval, including the dispatch, recall and archive of GP records • Assistance with sample selection of DF1 patients on an annual basis. • Administrative service for disciplinary hearings • Registration of patients onto, and removal of 	<ul style="list-style-type: none"> • 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"> • Oasis to store / retrieve archived documentation

	<p>patients from, the NHAIS patient index</p> <ul style="list-style-type: none"> • Issuing of medical cards • Assessment of entitlement to primary care services for individuals entering NI from outside the UK • Assignment of Patients unable to secure voluntary acceptance on a Contractor's List • Removal and assignment of violent patients • Administration of letters to patients where change in Practice circumstances require information to be disseminated • Publication and maintenance of the Primary Medical Services Performers List • Publication and maintenance of the Medical List • Processing of Exemption Certificates • Screening for eligibility for dispensing doctors' lists • Provision of information to the HSC Information Centre to enable analysis of GP earnings 		
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	<ul style="list-style-type: none"> • Provision of information to academic researchers working in the GMS field • Provision of death data to HSC Trusts • Provision of prior approvals (ophthalmic) • Administration of the ophthalmic list and statutory dental lists • Process all prescription forms dispensed in primary care in Northern Ireland • Process PV1 vouchers • Process Hospice Forms • Process Stock Forms • Process SP1/SP2 Forms • Process (information from) PCD1s/Private Controlled Drug Requisitions • Process prescription invoices (Pilot 18/19) • Process/Make Payment in relation to HSCB Schemes: • Process Adjustments to prescription items • Retrieve Prescription Images • Provide Advice and Guidance on Prescribing Processes and Pharmacy Initiatives 		
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	<ul style="list-style-type: none">• Process the Annual Levy for payment to CPNI• Process Oxygen Concentrator Payment• Process Previous Months Returns• Maintenance of the practice prescribing database• Bowel Screening (PHA only)• Cytology screening and recall (PHA only)		
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Appendix 7: Honest Broker Service (HBS)

The Business Services Organisation has established an Honest Broker Service (HBS) for Health and Social Care (HSC). The aim is to enable non-identifiable data to be safely shared to maximise the uses and health service benefits which can be gained from it, including planning, commissioning of services and public health monitoring. The HBS enables access to anonymised, aggregated and in some cases pseudonymised health and social care data to the DoH, HSC organisations and for anonymised data for health and social care related research.

A separate Memorandum of Understanding is already in place for HBS. Please refer to:

[http://www.hscbusiness.hscni.net/pdf/Memorandum%20of%20Understanding%20\(MOU\)%20Revised%20Apr%202018.pdf](http://www.hscbusiness.hscni.net/pdf/Memorandum%20of%20Understanding%20(MOU)%20Revised%20Apr%202018.pdf)

Appendix 8: Finance

Purpose: BSO Finance processes information in relation to statutory and contractual services they provide on behalf of the Northern Ireland Department of Health (DoH).

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Registration information • HSC service information. • National Insurance number • Details held in personnel files • Bank details • Passport information / status • Information concerning health and clinical treatment 	<ul style="list-style-type: none"> • Maintenance of a central banking service through which can be processed salaries, wages and traders payments in accordance with the agreed timetable. • To monitor for fraud and immediately notify client organisations if fraud is suspected. • Liaise with Shared Services Teams and finance staff in client organisations in case of difficulties with Payroll 	<ul style="list-style-type: none"> • Finance may 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"> • Oasis to store / retrieve archived documentation • Advanced Business Solutions for FPL (ICO Registration Number Z5562268)

Appendix 9: HSC Pension Service

Purpose: The HSC Pension Service administers the Pension Scheme across the HSC including Directional Bodies and GP Practices.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • DOB • Email / postal address • Telephone number • Relationship status • Dependent Children details • Employment details • Salary • Pensionable record • Maternity / paternity information. • National Insurance number • Bank details • Information concerning health • Sickness / absence/unpaid leave 	<ul style="list-style-type: none"> • Calculation of superannuation payments 	<ul style="list-style-type: none"> • HSC Pension Service may be obliged to provide personal information to other statutory 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"> • Oasis to store / retrieve archived documentation

Appendix 10: Human Resources (HR)

Purpose: HR provides a range of staff administration services for client organisations.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Family details (e.g. next of kin) • Education • Training • Salary • Sickness / absence • Details held in personnel files • Religious beliefs • Racial / Ethnic Origin • Offences, criminal proceedings, outcomes and sentences • Trade Union membership • Employment tribunal applications • Complaints • Accidents / Incidents 	<ul style="list-style-type: none"> • Monitor attendance / absence • Facilitate grievance / disciplinary / capability proceedings • Maintain accurate records on HRPTS / personnel files • Ensure new starts, promotions and secondments are processed correctly • Probation and performance management • Manage maternity / paternity / adoption leave • Maintain leavers' information (including calculation of final payments and exit interviews) • Facilitate employment / industrial tribunal cases 	<ul style="list-style-type: none"> • Conduct staff satisfaction surveys to assess quality of service and drive improvements • 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"> • Oasis to store / retrieve archived documentation • HCL Axon for HRPTS (ICO Registration Number Z7008137)

Appendix 11: Information Technology Service (ITS)

Purpose: ITS hosts a vast range of information systems of behalf of HSC Organisations

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> ITS processes a vast range of personal information, across systems and information used by HSC 	<ul style="list-style-type: none"> Ensure the availability, security and integrity of the ICT Infrastructure Services* and Application Services Provide a centralised service desk Manage contracts with 3rd parties Development, implementation and support of an online appraisal and revalidation system for doctors and dentists <p><i>*Refer to Appendix 1 of the ITS SLAs for a list of these services</i></p>	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Oasis to store / retrieve archived documentation

Appendix 12: Internal Audit (IA)

Purpose: IA with an objective evaluation of and opinion on the overall adequacy and effectiveness of their organisation’s framework of governance, risk management and control.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Human Resources Information (refer to HR) • Payroll Information (refer to PSSC) • Service User Information (refer to FPS) • Paying Patients (which includes Name, address, DOB, clinical information eg procedure, H&C number, Hospital Number, Private Insurance details, national insurance number. Information accessed from invoice backup from SSAR/eFin and from PAS) • Suppliers – where they are individuals/self-employed (Refer to APSS appendix) • 	<p>Review, appraise & report on, for each HSC organisation:</p> <ul style="list-style-type: none"> • The effectiveness of the governance and risk management arrangements • The adequacy and effectiveness of the systems of financial, operational and management controls and their operation in practice in relation to the identified business risks • The suitability, accuracy, reliability and integrity of financial and other management information and the means used to identify, measure, classify and report such information • The extent of compliance with policies, standards, plans and procedures established and the extent of compliance with the DoH guidance, laws and regulations, including 	<ul style="list-style-type: none"> • IA may be required to share information with the Northern Ireland Audit Office (NIAO) or their appointed representatives 	<ul style="list-style-type: none"> • Oasis to store / retrieve archived documentation

	<p>reporting requirements.</p> <ul style="list-style-type: none"> • The integrity of processes and systems to ensure that controls offer adequate protection against error, fraud and loss of all kinds • Instances of suspected fraud and irregularity • The extent to which the assets and interests of organisation are acquired economically, used efficiently, accounted for and safeguarded from loss of all kinds • Value for money considerations, where appropriate and relevant. • The follow-up action taken to remedy weaknesses identified by Internal Audit. 		
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NB: It is not possible to document the precise systems/datasets that Internal Audit will require to complete their function. The nature of each audit as per approved Annual Plan will dictate the types of data to which access is required (including but not limited to staff data as per payroll and human resources, patient data, service user data, supplier/contractor data, etc.). Access to all such personal data is necessary to complete programmes of work for each client, as approved by the client.

Appendix 13: Department of Legal Services (DLS)

Purpose: DLS is the sole provider of legal services for the Health and Social Care Sector (HSC) in Northern Ireland.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Family details (for example, next of kin) • Employment details (for example, salary and HSC service information, sickness absence) • Details held in personnel files • Medical records • Social care records 	<p>DLS aims to provide a high quality legal service to enable its clients to discharge their statutory functions and meet legal obligations in relation to:</p> <ul style="list-style-type: none"> • Family Law • Administrative Law • Employer and Public Liability Claims • Employment Law • Contract Law • Mental Health Law • Procurement Law • Commercial Law • Inquests • Professional Negligence • Debt recovery • Conveyancing • General Advice 	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Oasis to store / retrieve archived documentation • DLS may engage with 3rd party solicitors, courts and experts in the course of managing legal issues, as part of legal processes.

Appendix 14: Office for Research Ethics Committees Northern Ireland (ORECNI)

Purpose: 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.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Professional background and CV • Email / postal address • Telephone number • Bank details 	<ul style="list-style-type: none"> • CVs of researchers / research teams are processed as part of the research application process. 	<ul style="list-style-type: none"> • CVs of researchers / research teams will be visible during audit by the Health Research Authority (England). • 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. 	<ul style="list-style-type: none"> • Oasis to store / retrieve archived documentation

Appendix 15: Procurement and Logistics Service (PaLS)

Purpose: PaLS process personal information to facilitate the delivery of goods and services provided on behalf of other HSC organisations to the general public.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Family details (e.g. next of kin) 	<ul style="list-style-type: none"> • Provide a comprehensive, professional operational procurement service for stock commodities and non-stock goods and services in support of client organisations • Capture all relevant data in respect of purchasing activity on the non-stock system. • Retain records for audit purposes in accordance with PaLS procedures for governance purposes. • Pick, issue and deliver stock goods in accordance with warehouse process cycles to meet customer requirements. • Pack goods securely for delivery in a timely manner in accordance with defined delivery cycles • Manage the contract award process in accordance with 		<ul style="list-style-type: none"> • PaLS provide personal information to 3rd party contractors in order to facilitate delivery of goods and services. • Oasis to store / retrieve archived documentation • Advanced Business Solutions for FPL (ICO Registration Number Z5562268)

	<p>current regulations</p> <ul style="list-style-type: none">• Within available resources manage key contracts throughout their term including supplier performance, resolve disagreements and support supplier audits where required by contract terms.		
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Appendix 16: Shared Services Accounts Payable (APSS)

Purpose: APSS has full responsibility for managing the payments function for all of HSC.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Bank details • DOB • Health & Care Number • National Insurance Number • Staff number • Hospital Number (backup to patient travel claims) • Backup to invoices may include data of 3rd parties eg names /addresses of meals on wheels recipients / childrens's names /DOB 	<ul style="list-style-type: none"> • Match incoming purchase invoices • Process social care payments • Process invoices for suppliers to client organisations • Process patient travel forms • Process petty cash reimbursements • Duplicate payments identification and recovery • Detect / prevent fraud • 	<ul style="list-style-type: none"> • 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"> • Oasis to store / retrieve archived documentation • Advanced Business Solutions for FPL (ICO Registration Number Z5562268)

Appendix 17: Shared Services Accounts Receivable (SSAR)

Purpose: SSAR process personal information provided by other HSC Organisations for the purposes of raising HSC invoices and for the recovery process of public money.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Date of Birth • Bank details • Family details (e.g. next of kin) • Employment details (salary, HSC Service and absence information) • Medical information (e.g. details of clinical procedures) • Hospital number • Health & Care number • National insurance number • Private insurance details • Debit/credit card details • Staff number 	<ul style="list-style-type: none"> • Ensure prompt recovery of HSC funds / credit management • Bill customers of client organisations • Detect and prevent fraud • Receive/receipt money from payment of invoices • Process debit /credit card payments • Undertake bank reconciliations • Attend court re non payment of invoices • Trace customers 	<ul style="list-style-type: none"> • SSAR 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"> • Oasis to store / retrieve archived documentation • Advanced Business Solutions for FPL (ICO Registration Number Z5562268) • Capita

Appendix 18: Interpreting Service (NIHSCIS)

Purpose: NIHSCIS is the first point of contact for all HSC Language Interpreting in Northern Ireland. The main aim of the Service is to improve access to Health and Social Care for Patients who do not speak English as a first or competent second language

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<p>Interpreters:</p> <ul style="list-style-type: none"> • Name • Date of Birth • Email / postal address • Telephone number • Qualifications • Right to work documentation • Access NI checks • Proof of identity • Bank details • Complaints <p>Patients / Clients:</p> <ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Limited medical information 	<ul style="list-style-type: none"> • Booking and delivering of interpreters • Investigating complaints into the interpreting service 	<ul style="list-style-type: none"> • NIHSCIS 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"> • Personal information relating to patients / clients will be shared with interpreters in order to fulfil the service. • Oasis to store / retrieve archived documentation

Appendix 19: Payroll Services Centre (PSC)

Purpose: PSC is responsible for the end to end processing of employee and payroll information, and manages all travel and subsistence claims, for the HSC.

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Email / postal address • Telephone number • Date of Birth • Bank details • Family details (e.g. next of kin) • Employment details (salary, HSC Service and absence information) • Maternity details • Staff number • National insurance number • Sickness information including diagnosis • 	<p>PSC manage the following on behalf of HSC:</p> <ul style="list-style-type: none"> • Regular payroll run • Overpayments • Underpayments • Off cycle processing • Completion of relevant HSC Pensions Forms for all leavers (retirements / VES / death in service, etc.) • Provision of TSR figures • Generation of paper payslips • Submission of Earlier Year Updates • Issuing of P60s • Issuing of P11ds • Processing of expense claims • Provision of confirmation of employee earnings to mortgage providers and/or legal 	<ul style="list-style-type: none"> • PSC 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"> • HCL Axon for HRPTS (ICO Registration Number Z7008137) • Oasis to store / retrieve archived documentation

	<p>representatives</p> <ul style="list-style-type: none">• Sickness / absence payroll activity		
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Appendix 20: Recruitment Shared Services Centre (RSSC)

Purpose: RSSC is responsible for the management of all recruitment activity for its client organisations

Personal Data Processed	BSO Data Processor Activity	BSO Data Controller Activity	Sub-processors used
<ul style="list-style-type: none"> • Name • Email / postal address • Telephone number • Date of Birth • Gender • Marital Status • National Insurance Number • Work experience • Referee details • Education • Training • Professional Qualifications / Registration Status • Residency / Immigration • Community Background • Religious belief • Racial / Ethnic Origin • Nationality • Caring responsibilities • Disability • Sexual Orientation • Political opinion 	<ul style="list-style-type: none"> • Advertisement process • Shortlisting • Interview/Assessment • Offer Management • Pre-Employment Checking • Managing the creation/maintenance and usage of Regional/Trust Wide Waiting lists 	<ul style="list-style-type: none"> • RSSC 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"> • HCL Axon for HRPTS (ICO Registration Number Z7008137) • Oasis to store / retrieve archived documentation

Appendix 21: List of HSC Clients & Services

	CEC	Corporate Services	CFPS	Equality	FPS	Finance	Honest Broker Service	HSC Leadership Centre	HSC Pensions	HR	ITS	IA	DLS	ORECNI	PaLS	APSS	SSAR	NIHSCIS	PSC	RSSC
Belfast HSC Trust	✓	X	✓	X	✓	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Contractors (GPs, Dentists, Pharmacy)	X	X	X	X	X	✓	✓	✓	X	X	X	X	X	X	X	X	X	X	X	X
Health And Social Care Board	X	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
NI Ambulance Service	✓	X	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
NI Blood Transfusion Service	X	X	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
NI Guardian Ad Litem Agency	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
NI Medical & Dental Training Agency	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
NI Practice & Education Council	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
NI Social Care Council	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
Northern HSC Trust	✓	X	✓	X	✓	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Patient Client Council	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
Public Health Agency	X	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
Regulation & Quality Improvement Authority	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	X	✓	✓	✓	✓	✓	✓
South Eastern HSC Trust	✓	X	✓	X	✓	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Southern HSC Trust	✓	X	✓	X	✓	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Western HSC Trust	✓	X	✓	X	✓	X	✓	✓	✓	X	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

NB: Northern Ireland Practice & Education Council avail only of BSO's Data Protection Officer Service within Corporate Services.