

Date issued: April 2021

Data Matching: Community Pharmacy Pilot - Privacy Notice

This notice explains how your personal information is processed in connection with the Auditor General for Wales' community pharmacy data matching pilot exercise.

Who we are and what we do

The Auditor General for Wales' work includes examining how public bodies manage and spend public money, and the Wales Audit Office provides the staff and resources to enable him to carry out his work. Audit Wales is not a legal entity; it is the brand and umbrella identity of the Auditor General for Wales and the Wales Audit Office.

The relevant laws

We process personal data in relation to data matching exercises in accordance with our powers in Part 3A of the Public Audit (Wales) Act 2004 (sections 64A-64H) and in accordance with data protection legislation, including the Data Protection Act 2018 and the UK GDPR. We only process special category (sensitive) data when this is necessary for reasons of substantial public interest (with a basis in law) for the exercise of a function of the Auditor General for Wales.

Further information about the scope of these powers is available in the Code of Data Matching Practice, available on our [website](#).

Purpose

The purpose for conducting data matching exercises is to exercise powers under the Public Audit (Wales) Act 2004, to assist in the prevention and detection of fraud.

What happens during data matching

The focus of the pilot community pharmacy data matching exercise is to identify areas of risk of fraud and high cost. We will obtain datasets from NHS Wales Shared Services Partnership, jointly with NHS Counter Fraud Service Wales.

Data matching will involve analysing metrics of performance across pharmacies and practices, and comparing sets of such data, to facilitate the identification of fraudulent claims and areas of high cost. Where a match is found, it may indicate that there is an inconsistency which requires further investigation; it is not necessarily evidence of fraud or of inappropriate practice. It is for NHS Counter Fraud Services Wales to determine appropriate action to take on the basis of any anomalies detected in relation to fraud. Where no match is found, the data matching powers will have no material effect or impact on individuals whose data has been matched. Where we find areas of high cost, we will make the relevant Health Boards aware and it will be for them to determine appropriate action.

How data is shared

NHS Wales Shared Services Partnership will share data with us using an external file sharing application called Objective Connect.

We will share the base datasets received from NHS Wales Shared Services Partnership, as well as our data matching analysis with NHS Counter Fraud Service Wales, and the relevant Health Boards (Cwm Taf Morgannwg University Health Board and Swansea Bay University Health Board) in accordance with s64D of the Public Audit (Wales) Act 2004.

All sharing will be undertaken in accordance with the Data Sharing Protocol for the Pilot.

Retention

Your personal data will be kept securely by us for the periods set out in our Documents and Records Management Policy, which provides that most information collected for audit purposes will be kept securely for 6 years and then destroyed. Other bodies referred to in this notice which receive information from the data matching exercise may differ in their retention periods for the analysis and any subsequent investigation.

Individual rights

You have the right to request information about how your personal data are processed, and to request a copy of that personal data. You have the right to request that any inaccuracies in your personal data are rectified without delay. You have the right to request that your personal data are erased if there is no longer a justification for them to be processed. You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted. The processing of your data is

necessary for reasons of substantial public interest in the exercise of official authority vested in the Auditor General for Wales and other data matching controllers. You have the right to object to the processing of your personal data on grounds relating to your particular situation. If you object, we are required to demonstrate legitimate grounds for the processing.

Complaints about bodies participating in the Auditor General's data matching exercises should be addressed to those bodies. Complaints about how the Auditor General's functions are undertaken, including in respect how Wales Audit Office staff or others carry out work on his behalf, will be dealt with under the Wales Audit Office [complaints procedure](#).

Data Protection Officer (DPO)

If you wish to discuss any objections or concerns, or obtain a copy of the current personal information held about you, please write to: Martin Peters Data Protection Officer, Audit Wales, 24 Cathedral Road, Cardiff CF11 9LJ or by email to: infoofficer@audit.wales

Information Commissioner's Office (ICO)

If you require further information in relation to your rights under data protection law or want to complain about with how we are handling your personal data, you may contact the Information Commissioner at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF email: casework@ico.gsi.gov.uk