

Pharmacy First Service Privacy Notice for person accessing this service “Protecting & Using Your Information”

At _____ (*insert pharmacy details*) we are committed to the highest privacy standards. During your Pharmacy First consultation with our pharmacist, we will only collect data that is necessary for us to deliver the best possible service. This policy provides detailed information on why we collect your personal information as part of this service, how we use it and the very limited conditions under which we may disclose it to others. Personal information that is processed about you is governed by the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

What is a Pharmacy First Service?

Pharmacy First Service is a service whereby patients are encouraged to consult with their community pharmacist first rather than their GP, for a list of common conditions. The aim of a Pharmacy First Service is to move activity, including consultations and advice for common conditions, from GP practices to community pharmacies. As part of this service, **personal information will be processed about you.**

Why are you processing my personal information / Lawful basis for processing?

- Your personal information will be processed to enable the provision of the Pharmacy First Service.
- We rely on the following lawful basis when processing your personal information for the Pharmacy First Service:
 - Legitimate Interests: processing is necessary for the purposes of the legitimate interests pursued by this Pharmacy except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject; and
 - Public Task: processing is necessary for a task carried out in the public interest.

As the information we process about you constitutes health data it is classed as ‘Special Category’ data therefore a further lawful basis is required which we have identified as:

- Processing is necessary for the purposes of preventive or occupational medicine.

What categories of personal data are you processing?

Patient identifiable information including your name, address, health & care number, date of birth, contact details (address & telephone number) and details about the symptoms you are suffering. If appropriate, information about medicines you have been supplied, or reasons why you require onward referral to your GP.

Where do you get my personal data from?

Your personal data originates from information that you provide during the Pharmacy First consultation. Personal details such as your health & care number, address and date of birth may already be recorded on the pharmacy’s Patient Medication Record system and used during the consultation. Personal data held by your GP practice may also be accessed via your Electronic Care Record.

Do you share my personal data with anyone else?

Your personal data may be shared with the following:

- Your GP practice to help them provide care for you
- The DoH Strategic Planning & Performance Group (SPPG) for service evaluation and audit

- The SPPG and the Business Services Organisation (BSO), for the purposes of administering and managing health and social care services and to verify that the service has been delivered by the pharmacy as part of post-payment verification.
- With Medicines Optimisation Innovation Centre (MOIC) for the purposes of service evaluation

How long do you keep my personal data?

This record will be retained in the pharmacy for a period of eight years after the conclusion of treatment for adults; for children and young people, the record will be kept until the patient's 25th birthday or 26th if the young person was 17 at the conclusion of treatment or eight years after death. SPPG & BSO as health-care organisations hold information in line with the Department of Health Retention Policy identified in the document 'Good management, Good Records' which can be viewed at Department of Health's Good Management, Good Records Section M, outlines the requirements for retention and disposal of community pharmacy held records: <https://www.health-ni.gov.uk/articles/disposal-schedule-section-m>

What rights do I have?

- You have the right to obtain confirmation that your data is being processed, and access to your personal data
- You are entitled to have personal data rectified if it is inaccurate or incomplete
- You have a right to have personal data erased and to prevent processing, in specific circumstances
- You have the right to 'block' or suppress processing of personal data, in specific circumstances
- You have the right to data portability, in specific circumstances
- You have the right to object to the processing, in specific circumstances
- You have rights in relation to automated decision making and profiling

Further information on your rights is available at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>

How do I complain if I am not happy?

If you have any questions or concerns regarding how we use your personal information you can contact:

(insert name/contact details of relevant pharmacy staff member)

If we cannot resolve your concerns you have the right to lodge a complaint with the Information Commissioners office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk Website: <https://ico.org.uk/global/contact-us/>

Review - This document will be kept under review and updated as required; we reserve the right to make any changes and updates to this privacy policy without giving you notice as and when we need to. Our most up to date privacy policy is always available upon request.