**Note – this agreement is adapted from the NHS Scotland national information sharing toolkit. It does not follow that template exactly to facilitate a rapid response during the COVID-19 outbreak.**

**INFORMATION SHARING AGREEMENT**

**Emergency Care Summary Access for Community Pharmacists during the COVID-19 Outbreak**

**31 March 2020**

**1 Introduction**

This agreement sets out the terms of access to the NHS Grampian Emergency Care Summary for Community Pharmacists during the COVID-19 outbreak. Access will be one-many from NHS Grampian to all Community Pharmacy signatories of this document.

The data shared will be demographic data, medications prescribed and allergies recorded for each patient.

The sharing of this data will facilitate Community Pharmacy support of patients during the COVID-19 outbreak, reducing the need for individuals to access primary and secondary care and therefore increasing capacity for the COVID-19 response in those clinical settings.

**2 Parties, Scope and Purpose**

**2.1 Name and details of the parties who agree to share information**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Legal Name** | **Address** |  |  |  | **Common name** | **Role in this Agreement (controller or processor)** |
| **Grampian Health Board** | Summerfield House | 2 Eday Road | Aberdeen | AB15 6RE | NHS Grampian | Data Controller |
| **Baird's Pharmacy** | 6-12 Mid Street | Fraserburgh | Aberdeenshire | AB43 9AJ | Baird's Fraserburgh | Data Controller |
| **Baird's Pharmacy** | 144-146 Mid Street | Keith | Aberdeenshire | AB55 5BJ | Baird's Keith | Data Controller |
| **Boots the Chemists Ltd** | 25 Market Place | Inverurie | Aberdeenshire | AB51 9TU | Boots Inverurie | Data Controller |
| **Boots the Chemists Ltd** | Units 1-2, Dyce Shopping Centre | Dyce | Aberdeen | AB21 7LW | Boots Dyce | Data Controller |
| **Clerkhill Pharmacy** | 53 Clerkhill Road | Peterhead | Aberdeenshire | AB42 2XF | Clerkhill | Data Controller |
| **Boots the Chemists Ltd** | 475 Great Western Road | Mannofield | Aberdeen | AB10 6NN | Boots Mannofield | Data Controller |
| **Blackburn Pharmacy** | Main Road | Blackburn | Aberdeenshire | AB21 0SS | Blackburn Pharmacy | Data Controller |
| **Boots the Chemists Ltd** | 7-11 Broad Street | Fraserburgh | Aberdeenshire | AB43 9AE | Boots Fraserburgh | Data Controller |
| **Torphins Pharmacy** | 1 Beltie Road | Torphins | Aberdeenshire | AB31 4JP | Torphins | Data Controller |
| **Boots the Chemists Ltd** | 21-23 Marischal Street | Peterhead | Aberdeenshire | AB42 1BS | Boots Peterhead | Data Controller |
| **Boots the Chemists Ltd** | 110-112 High Street | Elgin | Moray | IV30 1BW | Boots Elgin High Street | Data Controller |
| **Boots the Chemists Ltd** | 2-4 Evan Street | Stonehaven | Aberdeenshire | AB39 2EQ | Boots Stonehaven | Data Controller |
| **Boots the Chemists Ltd** | Bon-Accord Centre |  | Aberdeen | AB25 1UZ | Boots Bon Accord | Data Controller |
| **Anderson & Spence Ltd** | 31 Fountainhall Road |  | Aberdeen | AB15 4EW | Anderson and Spence | Data Controller |
| **Lloyds Pharmacy** | 359 North Deeside Road |  | Aberdeen | AB15 9SX | Lloyds Cults | Data Controller |
| **Lloyds Pharmacy** | 175 - 177 High Street | Elgin | Moray | IV30 1DW | Lloyds 176 Elgin High st. | Data Controller |
| **Christies of Fochabers Ltd** | 62 High Street | Fochabers | Moray | IV32 7DU | Christies Of Fochabers | Data Controller |
| **Wellness Pharmacy** | 31 Finlayson Street | Fraserburgh | Aberdeenshire | AB43 9JQ | Wellness | Data Controller |
| **Davidson Chemists** | The Pharmacy, Ballater Road | Aboyne | Aberdeenshire | AB34 5HT | Davidson's Aboyne | Data Controller |
| **Davidson Chemists** | 10 Bridge Street | Ballater | Aberdeenshire | AB35 5QP | Davidson's Ballater | Data Controller |
| **Davidson Chemists** | 340 Great Western Road |  | Aberdeen | AB10 6LX | Davidson's Aberdeen | Data Controller |
| **your local Boots pharmacy** | 4 High Street | Turriff | Aberdeenshire | AB53 4DS | Boots Turriff | Data Controller |
| **Websters Pharmacy** | 624 King Street |  | Aberdeen | AB24 1SN | Webster's King Street | Data Controller |
| **Baird's Pharmacy** | 519 King Street |  | Aberdeen | AB24 3BT | Baird's King Street | Data Controller |
| **Davidsons Chemists** | 61 High Street | Banchory | Aberdeenshire | AB31 5TJ | Davidson's Banchory | Data Controller |
| **Rosemount Pharmacy** | 1 Mount Street |  | Aberdeen | AB25 2RA | Rosemount | Data Controller |
| **Boots the Chemists Ltd** | 4 South Terrace, Union Square | Union Square | Aberdeen | AB11 5PF | Boots Union Square | Data Controller |
| **Bishopmill Pharmacy** | 20 North Street, Bishopmill | Elgin | Moray | IV30 4EF | Bishopmill | Data Controller |
| **Nicholas S Wilson Ltd** | The Pharmacy | Alford | Aberdeenshire | AB33 8PX | Alford | Data Controller |
| **Nicholas S Wilson Ltd** | 2a High Street | Insch | Aberdeenshire | AB52 6JF | Insch | Data Controller |
| **Lewis Road Pharmacy** | Unit 1 Lewis Road | South Sheddocksley | Aberdeen | AB16 6TU | Lewis Rd | Data Controller |
| **B A Christie Pharmacy** | Unit 3-4 Sclattie Park Shopping Centre | Bucksburn | Aberdeen | AB21 9QL | B.A. Christie | Data Controller |
| **Duke Street Pharmacy** | 26 Duke Street | Huntly | Aberdeenshire | AB54 8DL | Duke Street | Data Controller |
| **Cove Bay Pharmacy** | Unit 5, Loirston Avenue | Cove Bay | Aberdeen | AB12 3HE | Cove Bay | Data Controller |
| **Boots the Chemists Ltd** | Unit 2 Springfield Retail Park, Edgar Road | Elgin | Moray | IV30 6WQ | Boots Springfield | Data Controller |
| **Listermac Pharmacy** | 3 Seaview Road | Findochty | Moray | AB56 1QX | Findochty | Data Controller |
| **Clear Pharmacy** | 168 Holburn Street |  | Aberdeen | AB10 6AD | Clear Holburn St | Data Controller |
| **Listermac Pharmacy** | 3 Union Street | Portknockie | Moray | AB56 4LF | Portknockie | Data Controller |
| **Aberlour Pharmacy** | 112 High Street | Aberlour | Moray | AB38 9NX | Aberlour | Data Controller |
| **Garden's Pharmacy** | 49 Mid Street | Fraserburgh | Aberdeenshire | AB43 9AJ | Garden's | Data Controller |
| **Lloyds Pharmacy** | Sainsbury Superstore | Berryden Road | Aberdeen | AB25 3SA | Lloyds Sainsbury | Data Controller |
| **Crimond Pharmacy** | Crimond Medical Centre | Crimond | Aberdeenshire | AB43 8QJ | Crimond | Data Controller |
| **Lloyds Pharmacy** | 48 High Street | Elgin | Moray | IV30 1BU | Lloyds 48 Elgin High St. | Data Controller |
| **Lloyds Pharmacy** | 453-455 Great Northern Road | Woodside | Aberdeen | AB24 2EH | Lloyds Great Northern Rd | Data Controller |
| **Lloyds Pharmacy** | Unit 26, Westhill Shopping Centre | Westhill | Aberdeenshire | AB32 6RL | Lloyds Westhill | Data Controller |
| **Tarland Pharmacy** | 1 The Square | Tarland | Aberdeenshire | AB34 4YL | Tarland | Data Controller |
| **Newtonhill Pharmacy** | 1 Skateraw Road | Newtonhill | Aberdeenshire | AB39 3PU | Newtonhill | Data Controller |
| **Clear Pharmacy** | 3 Alford Place |  | Aberdeen | AB10 1YD | Clear Aberdeen | Data Controller |
| **Charles Michie Pharmacy** | 67 High Street | Banchory | Aberdeenshire | AB31 5TJ | Michie's Banchory | Data Controller |
| **Charles Michie Pharmacy** | Old Village Road | Portlethen | Aberdeenshire | AB12 4JS | Michie's Portlethen | Data Controller |
| **Clear Pharmacy** | 99 High Street | Forres | Moray | IV36 1AA | Clear Forres | Data Controller |
| **Albyn Pharmacy** | 156 Union Grove |  | Aberdeen | AB10 6SR | Albyn | Data Controller |
| **Strachan Pharmacy** | 69 High Street | Banff | Aberdeenshire | AB45 1AN | Strachan's Banff | Data Controller |
| **Dufftown Pharmacy** | 15 Balvenie Street | Dufftown | Moray | AB55 4AB | Clark's Dufftown | Data Controller |
| **New Deer Pharmacy** | 14-16 Main Street | New Deer | Aberdeenshire | AB53 6TA | New Deer | Data Controller |
| **Baird's Pharmacy** | 302-304 Clifton Road | Woodside | Aberdeen | AB24 4HP | Baird's Woodside | Data Controller |
| **Gardner Drive Pharmacy** | 68 Gardner Drive | Kincorth | Aberdeen | AB12 5SD | Gardner Drive | Data Controller |
| **Ferryhill Pharmacy** | 9 Millburn Street | Ferryhill | Aberdeen | AB11 6SS | Ferryhill | Data Controller |
| **Holburn Pharmacy** | 560 Holburn Street |  | Aberdeen | AB10 7LJ | Holburn | Data Controller |
| **Buckpool Pharmacy** | 12 St Andrews Square | Buckie | Moray | AB56 1BU | Buckpool | Data Controller |
| **Peterculter Pharmacy** | 187 North Deeside Road | Peterculter | Aberdeen | AB14 0UJ | Peterculter | Data Controller |
| **Tarves Pharmacy** | 8 Duthie Road | Tarves | Aberdeenshire | AB41 7JX | Tarves | Data Controller |
| **Rothes Pharmacy** | 26-28 High Street | Rothes | Moray | AB38 7AU | Rothes Pharmacy | Data Controller |
| **E I Mackie** | 7 Ramsay Crescent | Garthdee | Aberdeen | AB10 7BL | E.I. Mackie | Data Controller |
| **Charles Michie Pharmacy** | 57 King Street | Inverbervie | Aberdeenshire | DD10 0RB | Michie's Inverbervie | Data Controller |
| **Charles Michie Pharmacy** | 24 High Street | Laurencekirk | Aberdeenshire | AB30 1AB | Michie's Laurencekirk | Data Controller |
| **Charles Michie Pharmacy** | 391 Union Street |  | Aberdeen | AB11 6BX | Michie's Union st. | Data Controller |
| **Charles Michie Pharmacy** | 24 Market Square | Stonehaven | Aberdeenshire | AB39 2BE | Michie's Stonehaven | Data Controller |
| **Charles Michie Pharmacy** | 287 Rosemount Place | Rosemount | Aberdeen | AB25 2YB | Michie's Rosemount | Data Controller |
| **ASDA Pharmacy** | Jesmond Drive, Middleton Park | Bridge of Don | Aberdeen | AB22 8WQ | Asda BOD | Data Controller |
| **your local Boots pharmacy** | Unit 16 Greenfern Place | Mastrick Shopping Centre | Aberdeen | AB16 6JR | Boots Mastrick | Data Controller |
| **Normac Pharmacy** | Ardach Health Centre, Highfield Road | Buckie | Moray | AB56 1JE | Normac (Ardach) | Data Controller |
| **Superdrug Pharmacy** | Unit E1 St Nicholas Shopping Centre |  | Aberdeen | AB10 1HW | Superdrug | Data Controller |
| **Taylor's Pharmacy** | 1 High Street | Buckie | Moray | AB56 1AL | Taylor's (Norvik) | Data Controller |
| **Peterhead Health Centre Consortium** | Links Terrace | Peterhead | Aberdeenshire | AB42 2XA | Peterhead HC | Data Controller |
| **John Ross (Chemists) Ltd** | 37-39 Station Road | Ellon | Aberdeenshire | AB41 9AR | John Ross Ellon | Data Controller |
| **John Ross (Chemists) Limited** | Fyvie Post Office | Fyvie | Aberdeenshire | AB53 8JP | John Ross Fyvie | Data Controller |
| **George Ellis** | 1 Seafield Street | Portsoy | Aberdeenshire | AB45 2QL | Portsoy | Data Controller |
| **Abbotswell Pharmacy** | 2 Abbotswell Crescent | Kincorth | Aberdeen | AB12 5AR | Abbotswell | Data Controller |
| **TESCO Pharmacy** | Tesco Superstore, The Parkway | Bridge of Don | Aberdeen | AB22 8HB | Tesco | Data Controller |
| **Websters Pharmacy** | 7-9 Queen Street | Peterhead | Aberdeenshire | AB42 1TN | Webster's Peterhead | Data Controller |
| **Robert Whitelaw (Aberdeen) Ltd** | 3 Waverly Place |  | Aberdeen | AB10 1XH | Whitelaw's Waverly pl. | Data Controller |
| **Burghmuir Pharmacy** | 2A Burghmuir Drive | Inverurie | Aberdeenshire | AB51 4GY | Burghmuir | Data Controller |
| **Robert Whitelaw (Aberdeen) Ltd** | 46 Rosemount Viaduct | Rosemount | Aberdeen | AB25 1NT | Whitelaw's Rosemount | Data Controller |
| **Dickies Pharmacy** | 44 Moir Green | Northfield | Aberdeen | AB16 7GS | Dickie's Moir Green | Data Controller |
| **Robert Whitelaw (Aberdeen) Ltd** | 108 Victoria Street | Dyce | Aberdeen | AB21 7AU | Whitelaw's Dyce | Data Controller |
| **ASDA Pharmacy** | Asda Superstore, Portlethen Shopping Centre | Portlethen | Aberdeenshire | AB12 4XP | Asda Portlethen | Data Controller |
| **your local Boots pharmacy** | Glassgreen Centre, 2 Thornhill Road | Elgin | Moray | IV30 6GQ | Boots Glassgreen | Data Controller |
| **John Ross (Chemists) Ltd** | 1 The Square | Kintore | Aberdeenshire | AB51 0UA | John Ross Kintore | Data Controller |
| **John Ross (Chemists) Ltd** | 109 Hayton Road |  | Aberdeen | AB24 2RN | John Ross Tillydrone | Data Controller |
| **Boots Pharmacy** | Foresterhill Health Centre | ARI, Westburn Road | Aberdeen | AB25 2UZ | Boots Foresterhill HC | Data Controller |
| **John Ross (Chemists) Ltd** | 34 Queen Street | Lossiemouth | Moray | IV31 6PJ | John Ross Lossiemouth | Data Controller |
| **Robert Whitelaw (Aberdeen) Ltd** | 68 Victoria Road | Torry | Aberdeen | AB11 9DS | Whitelaw's Torry | Data Controller |
| **Lloyds Pharmacy** | 9-11 Inverurie Road | Bucksburn | Aberdeen | AB21 9LJ | Lloyds Bucksburn | Data Controller |
| **Lloyds Pharmacy** | 157 Duff Street | Macduff | Aberdeenshire | AB44 1TL | Lloyds Macduff | Data Controller |
| **Lloyds Pharmacy** | 23a Clifton Road | Lossiemouth | Moray | IV31 6DJ | Lloyds Lossiemouth | Data Controller |
| **Clark's Pharmacy** | 12-18 Regent Street | Keith | Moray | AB55 5DU | Clark's Keith | Data Controller |
| **your local Boots pharmacy** | 27 Scotstown Road | Bridge of Don | Aberdeen | AB22 8HH | Boots Scotstown | Data Controller |
| **Strachan Pharmacy** | 29 Main Street | Turriff | Aberdeenshire | AB53 4AB | Strachan's Turriff | Data Controller |
| **Kemnay Pharmacy Ltd** | 17 High Street | Kemnay | Aberdeenshire | AB51 5NB | Kemnay | Data Controller |
| **your local Boots pharmacy** | 88/94 High Street | Forres | Moray | IV36 1NX | Boots Forres | Data Controller |
| **Largue Pharmacy** | 10-12 Gordon Street | Huntly | Aberdeenshire | AB54 8AJ | Largue | Data Controller |
| **Boots the Chemists Ltd** | Unit 1 Garthdee Retail Park | Garthdee | Aberdeen | AB10 7QA | Boots Garthdee | Data Controller |
| **Rowlands Pharmacy** | The Square | Mintlaw | Aberdeenshire | AB42 5EH | Rowlands Mintlaw | Data Controller |
| **Rowlands Pharmacy** | 32 Market Street | Ellon | Aberdeenshire | AB41 9JD | Rowlands Ellon | Data Controller |
| **Rowlands Pharmacy** | 381a North Deeside Road | Cults | Aberdeen | AB15 9SX | Rowlands Cults | Data Controller |
| **Will Chemists (Inverurie) Ltd** | 35 West High Street | Inverurie | Aberdeenshire | AB51 9QQ | Will Inverurie | Data Controller |
| **Rowlands Pharmacy** | City Hospital, Park Road |  | Aberdeen | AB24 5AU | Rowlands City Hospital | Data Controller |
| **Rowlands Pharmacy** | 695 George Street |  | Aberdeen | AB25 3XP | Rowlands George st. | Data Controller |
| **Rowlands Pharmacy** | 10 Byron Square | Northfield | Aberdeen | AB16 7LL | Rowlands Byron Square | Data Controller |
| **Douglas Dickie Chemist** | 96 Victoria Road | Torry | Aberdeen | AB11 9DU | Dickie's Torry | Data Controller |
| **Dickies Pharmacy** | Kingswood Drive | Kingswells | Aberdeen | AB15 8SB | Kingswells | Data Controller |
| **Websters Pharmacy** | 4 Hilton Drive | Hilton | Aberdeen | AB24 4NU | Webster's Hilton | Data Controller |
| **Buchanhaven Pharmacy** | 23 Skelton Street | Peterhead | Aberdeenshire | AB42 1HR | Buchanhaven | Data Controller |
| **Meldrum Pharmacy** | 37 Market Square | Oldmeldrum | Aberdeenshire | AB51 0AA | John Ross Oldmeldrum | Data Controller |
| **Lloyds Pharmacy** | 12a Arnhall Business Park | Westhill | Aberdeenshire | AB32 6SN | Lloyds Arnhall | Data Controller |
| **Parkhead Pharmacy** | 18 Grant Street | Burghead | Moray | IV30 5UE | Burghead | Data Controller |
| **Parkhead Pharmacy** | 26 Harbour Street | Hopeman | Moray | IV30 5RU | Hopeman | Data Controller |
| **John Ross (Chemists) Ltd** | 17 Oldmeldrum Road | Newmachar | Aberdeenshire | AB21 0PJ | John Ross Newmachar | Data Controller |
| **Morrisons Pharmacy** | 215 King Street |  | Aberdeen | AB24 5DA | Morrison's | Data Controller |
| **Websters Pharmacy** | 86A High Street | New Pitsligo | Aberdeenshire | AB43 6NN | Webster's New Pitsligo | Data Controller |
| **Websters Pharmacy** | 45 High Street | Strichen | Aberdeenshire | AB43 6SQ | Webster's Strichen | Data Controller |
| **Aberchirder Pharmacy** | 55 Main Street | Aberchirder | Aberdeenshire | AB54 7ST | Aberchirder | Data Controller |
| **Dickies Pharmacy** | Unit 3, Rowan Drive | Balmedie | Aberdeenshire | AB23 8SW | Balmedie | Data Controller |
| **Braemar Pharmacy** | 23 Mar Road | Braemar | Aberdeenshire | AB35 5YP | Braemar | Data Controller |
| **Summerhill Pharmacy Ltd** | Unit 16 Langstracht Shopping Centre | Summerhill | Aberdeen | AB15 6TW | Summerhill | Data Controller |
| **Braehead Pharmacy** | Braehead Way Shopping Centre | Bridge of Don | Aberdeen | AB22 8RR | Braehead | Data Controller |
| **Cruden Pharmacy** | Aulton Road | Cruden Bay | Aberdeenshire | AB42 0NJ | Cruden Bay | Data Controller |
| **Lhanbryde Pharmacy** | 32 St Andrews Road | Lhanbryde | Moray | IV30 8NZ | Lhanbryde | Data Controller |
| **Bairds Pharmacy** | 11 Castle Street | Banff | Aberdeenshire | AB45 1DH | Baird's Banff | Data Controller |
| **Cullen Pharmacy** | 28-30 Seafield Street | Cullen | Moray | AB56 4RS | Cullen | Data Controller |
| **Clear Pharmacy** | 83 High Street | Forres | Moray | IV36 1AA | Clear Pharmacy Forres | Data Controller |

The nature of the data being shared means that NHS Grampian acts as the initial data controller for the Emergency Care Summary (ECS) and holds it in its totality. Access will be provided to Community Pharmacists so that they can consult records on a patient by patient basis as required. They will not hold or access the totality of the ECS for all NHS Grampian patients.

Once any Community Pharmacy accesses data concerning a patient that they are supporting, they become the data controller for that record where that data is being processed for their purposes and subject to all rights and responsibilities commensurate with that role.

**2.2 Business and legislative drivers for sharing data.**

To open ECS records to community pharmacists during the COVID-19 to facilitate their support of NHS Grampian patients for routine matters, reducing the pressure on other parts of the system.

The data provided will be limited to biographical data, prescribing data and data concerning allergies. Additional datasets may be considered in due course and will be assessed separately.

NHS Grampian is aligning with the request of the Scottish Government in this domain made 17 March and signed by AIDAN GRISEWOOD Deputy Director, Primary Care, JONATHAN CAMERON Deputy Director, Digital Health and Care and ROSE MARIE PARR, Chief Pharmaceutical Officer.

**2.2.1 Purpose(s) of the information sharing**

|  |  |
| --- | --- |
| Indicate how the data controllers will decide upon changes in the purpose(s) of the information sharing | Jointly or independently |
| Independently once any patient record is accessed by any Community Pharmacy. At that point the Community Pharmacy becomes the controller for the information they use from the system in respect of their own records and recordkeeping. |

**2.2.2 Legal basis for the processing and constraints**

Without detriment of any other legal basis that may be applicable (e.g. criminal investigation, etc.) the following are the core legal basis for each of the parties to this agreement:

|  |  |  |
| --- | --- | --- |
| Basis – personal data | Guidance | Parties |
| Vital interest | The processing is necessary to protect someone’s life | ALL – where processed to prevent risk to life |
| Public Task | The processing is necessary to perform a task in the public interest or for official functions | ALL |
| Legal Obligation | The processing is necessary to comply with the law | ALL - insofar as statutory reporting etc may be required |

|  |  |  |
| --- | --- | --- |
| Basis – special categories of personal data | Guidance | Parties |
| Vital Interest | The processing is necessary to protect someone’s life | ALL – where processed to prevent risk to life |
| Health or Social Care | The processing is necessary for the provision of health or social care treatment | ALL |
| Public Health | The processing is necessary for the protection of public health | ALL – COVID-19 outbreak |

**3 Description of the information to be shared**

The patient Emergency Care Summary:

|  |  |  |
| --- | --- | --- |
| Data category | Data type | Data Controller(s) |
| Demographic data (name, address, CHI No, DoB etc) | Personal data | NHS Grampian in the core system. When used by Community Pharmacies, they become data controller for those records and data they hold concerning any patient. |
| Data concerning medicines prescribed and allergies of any patient | Special category personal data – health data | NHS Grampian in the core system. When used by Community Pharmacies, they become data controller for those records and data they hold concerning any patient. |

The parties agree this is the minimum amount of data needed to properly fulfil the purposes of this agreement.

**4 Description and manner of information sharin****g**

**4.1 Data flows**

In phase 1 (week of 30 March 2020) a NHS account will be created for each Pharmacy signing this agreement. A web interface will provide access to the ECS. This functionality is built into the ECS software provided by NHS National Services Scotland.

In phase 2 (c.3 weeks after phase 1), Community Pharmacy staff will be transitioned to their own unique log-in.

The process is:

An authorised user at each pharmacy will log in using the account for their pharmacy (or own log-in once issued)> Land on search page > Can find patient by CHI or Searching Name and DOB > Opens Emergency Care Summary>Marks consent for access.

**4.2 How data/information is to be accessed, processed and used**

A work instruction has been prepared for Community Pharmacies.



Fair warning will be applied to the system. A work instruction has been produced for Community Pharmacists concerning that system.



Access to the ECS via the web is read-only. Community Pharmacies may not alter data in the core record, download or seek to exfiltrate data from the system.

**4.3 Summary of how decisions are going to be made with regards to the manner of the processing.**

NHS Grampian has facilitated access for Community Pharmacies per the Scottish Government requirement per the terms of this agreement. Community Pharmacies will implement all necessary technical and organisational security controls to ensure the security of the data once in their environments. If they are unable to ensure that security they must refer to NHS Grampian. Once any Community Pharmacy takes a decision to access any data from the ECS system they become the data controller for that data for their purposes and subject to all associated rights and obligation. Any evidence of improper access to personal data detected by NHS Grampian will be reported to the General Pharmaceutical Council.

**5 Impact assessments and preparatory work**

The proposal to open the ECS to Community Pharmacies has been the subject of a Rapid Access Risk Assessment by NHS Grampian. A full DPIA will follow should this access extend beyond the COIVD-19 outbreak. Community Pharmacies may also wish to risk assess/conduct a data protection impact assessment in respect of this purpose.

**6 Privacy information (transparency requirement)**

Privacy information has been prepared for sharing with patients by Community Pharmacies when the ECS is accessed.



**7 Accuracy of the information**

The information is that maintained by NHS Grampian in the ECS for each patient. Community Pharmacists are not permitted to change the core record. Community Pharmacies are responsible for the accuracy of any data in their records or systems for which they act as data controller.

**8 Data retention and secure disposal**

Data will be retained in the ECS per normal NHS Grampian practice and the Scottish Government Records Management: NHS Code of Practice (or successor document). Community Pharmacies will be responsible for their own compliant retention and disposal practices should they become data controller for any data accessed via the ECS.

**9 The rights of individuals**

Individual rights are not changed by this proposal. Any individual may exercise their rights in respect of their data with any or all of the data controllers who may be processing it for this purposes.

Secondary use of data, automated decision making including profiling and direct marketing using ECS data are expressly prohibited.

**10 Security, risk and impact of the processing**

All Community Pharmacy signatories to this agreement shall:

10.1 Not engage a data processor to process ECS data on their behalf without the written authorisation of NHS Grampian.

10.2 Process data from the ECS only in connection with the purposes of this agreement (ie patient support during the COVID-19 outbreak). They shall access the ECS record only where there is a clinical need to do so and shall not access records where that need does not exist. They shall not access the ECS record for any other purpose without the express written permission of NHS Grampian, unless required to do so by law.

10.3 Ensure that only those persons required to access patient information for clinical purposes do so. A log shall be kept of who accessed ECS records and when. Such logs shall be made available to NHS Grampian for audit and investigation purposes as required by NHS Grampian.

10.4 Ensure that all persons accessing the system have been training appropriately, understand the limits of their access and are aware of the use of the Fair Warning system per 4.2 above.

10.5 Ensure that any person accessing patient information via the ECS has signed a confidentiality agreement or has a similar contractual control in place. Any improper access to or use of the ECS shall result in the same contractual penalties as improper access to or use of other special categories of personal data under the control of the Community Pharmacy.

10.6 Implement and maintain at its own expense all technical and organisational measures required to ensure the security of and prevent inappropriate access to the ECS, including maintaining the security of usernames and passwords for access to the ECS and ensuring that all devices from which the ECS is accessed are password protected. Access to the ECS for Community Pharmacies is read-only and they may not in any circumstances seek to download or otherwise transfer data (for example via screen-shot) from the ECS to non-NHS Grampian end user devices or records.

10.7 Assist NHS Grampian with any requests from data subjects in respect of their data rights. NHS Grampian shall provide the same assistance to Community Pharmacies.

10.8 Inform NHS Grampian within 24 of the identification of any suspected data breach or similar data loss event concerning the data shared under this agreement. NHS Grampian will collaborate with the Community Pharmacy concerning any response and/or statutory notification to the Information Commissioner’s Office or data subjects. This includes triggering investigations using the Fair Warning system (see 4.2 above).

**11 International transfers of personal data**

International transfers of data subject to this agreement is not permitted and data may not be transferred outwith the UK.

**12 Implementation of the information sharing agreement**

**12.1 Dates when information sharing commences/ends**

Information sharing commences upon the signing and return of the agreement by Community Pharmacies (expected to be on or around 1 April 2020). Sharing will end at the cessation of the measures to respond to the COVID-19 outbreak, unless the agreement is extended (and subject to further to review). The date of cessation will be agreed by NHS Grampian in conjunction with Community Pharmacies.

**12.2 Training and communications**

All Community Pharmacy staff with access must complete local data protection training prior to being given access to ECS and be trained per the requirements of 4.2 above.

**12.3 Information sharing instructions and security controls**

Controls shall be as specified by this agreement.

**12.4 Non-routine information sharing and exceptional circumstances**

Any sharing not covered by this agreement shall be agreed by NHS Grampian and the relevant Community Pharmacy prior to that sharing taking place.

**12.5 Monitoring, review and continuous improvement**

This sharing agreement will be reviewed at the cessation of measures to respond to the COIVD-19 outbreak.

**13 Sign-off**

We the undersigned agree to the details and controls recorded in this Information Sharing Agreement and are committed to the ongoing monitoring and review of the scope, purpose and manner of the information sharing.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Legal Name | Address |  |  |  | Authorised Signatory | Name and Designation |
| Grampian Health Board | Summerfield House | 2 Eday Road | Aberdeen | AB15 6RE |  | Professor Nick Fluck, Medical Director, Caldicott Guardian and SIRO |
| Baird's Pharmacy | 6-12 Mid Street | Fraserburgh | Aberdeenshire | AB43 9AJ |  |  |
| Baird's Pharmacy | 144-146 Mid Street | Keith | Aberdeenshire | AB55 5BJ |  |  |
| Boots the Chemists Ltd | 25 Market Place | Inverurie | Aberdeenshire | AB51 9TU |  |  |
| Boots the Chemists Ltd | Units 1-2, Dyce Shopping Centre | Dyce | Aberdeen | AB21 7LW |  |  |
| Clerkhill Pharmacy | 53 Clerkhill Road | Peterhead | Aberdeenshire | AB42 2XF |  |  |
| Boots the Chemists Ltd | 475 Great Western Road | Mannofield | Aberdeen | AB10 6NN |  |  |
| Blackburn Pharmacy | Main Road | Blackburn | Aberdeenshire | AB21 0SS |  |  |
| Boots the Chemists Ltd | 7-11 Broad Street | Fraserburgh | Aberdeenshire | AB43 9AE |  |  |
| Torphins Pharmacy | 1 Beltie Road | Torphins | Aberdeenshire | AB31 4JP |  |  |
| Boots the Chemists Ltd | 21-23 Marischal Street | Peterhead | Aberdeenshire | AB42 1BS |  |  |
| Boots the Chemists Ltd | 110-112 High Street | Elgin | Moray | IV30 1BW |  |  |
| Boots the Chemists Ltd | 2-4 Evan Street | Stonehaven | Aberdeenshire | AB39 2EQ |  |  |
| Boots the Chemists Ltd | Bon-Accord Centre |  | Aberdeen | AB25 1UZ |  |  |
| Anderson & Spence Ltd | 31 Fountainhall Road |  | Aberdeen | AB15 4EW |  |  |
| Lloyds Pharmacy | 359 North Deeside Road |  | Aberdeen | AB15 9SX |  |  |
| Lloyds Pharmacy | 175 - 177 High Street | Elgin | Moray | IV30 1DW |  |  |
| Christies of Fochabers Ltd | 62 High Street | Fochabers | Moray | IV32 7DU |  |  |
| Wellness Pharmacy | 31 Finlayson Street | Fraserburgh | Aberdeenshire | AB43 9JQ |  |  |
| Davidson Chemists | The Pharmacy, Ballater Road | Aboyne | Aberdeenshire | AB34 5HT |  |  |
| Davidson Chemists | 10 Bridge Street | Ballater | Aberdeenshire | AB35 5QP |  |  |
| Davidson Chemists | 340 Great Western Road |  | Aberdeen | AB10 6LX |  |  |
| your local Boots pharmacy | 4 High Street | Turriff | Aberdeenshire | AB53 4DS |  |  |
| Websters Pharmacy | 624 King Street |  | Aberdeen | AB24 1SN |  |  |
| Baird's Pharmacy | 519 King Street |  | Aberdeen | AB24 3BT |  |  |
| Davidsons Chemists | 61 High Street | Banchory | Aberdeenshire | AB31 5TJ |  |  |
| Rosemount Pharmacy | 1 Mount Street |  | Aberdeen | AB25 2RA |  |  |
| Boots the Chemists Ltd | 4 South Terrace, Union Square | Union Square | Aberdeen | AB11 5PF |  |  |
| Bishopmill Pharmacy | 20 North Street, Bishopmill | Elgin | Moray | IV30 4EF |  |  |
| Nicholas S Wilson Ltd | The Pharmacy | Alford | Aberdeenshire | AB33 8PX |  |  |
| Nicholas S Wilson Ltd | 2a High Street | Insch | Aberdeenshire | AB52 6JF |  |  |
| Lewis Road Pharmacy | Unit 1 Lewis Road | South Sheddocksley | Aberdeen | AB16 6TU |  |  |
| B A Christie Pharmacy | Unit 3-4 Sclattie Park Shopping Centre | Bucksburn | Aberdeen | AB21 9QL |  |  |
| Duke Street Pharmacy | 26 Duke Street | Huntly | Aberdeenshire | AB54 8DL |  |  |
| Cove Bay Pharmacy | Unit 5, Loirston Avenue | Cove Bay | Aberdeen | AB12 3HE |  |  |
| Boots the Chemists Ltd | Unit 2 Springfield Retail Park, Edgar Road | Elgin | Moray | IV30 6WQ |  |  |
| Listermac Pharmacy | 3 Seaview Road | Findochty | Moray | AB56 1QX |  |  |
| Clear Pharmacy | 168 Holburn Street |  | Aberdeen | AB10 6AD |  |  |
| Listermac Pharmacy | 3 Union Street | Portknockie | Moray | AB56 4LF |  |  |
| Aberlour Pharmacy | 112 High Street | Aberlour | Moray | AB38 9NX |  |  |
| Garden's Pharmacy | 49 Mid Street | Fraserburgh | Aberdeenshire | AB43 9AJ |  |  |
| Lloyds Pharmacy | Sainsbury Superstore | Berryden Road | Aberdeen | AB25 3SA |  |  |
| Crimond Pharmacy | Crimond Medical Centre | Crimond | Aberdeenshire | AB43 8QJ |  |  |
| Lloyds Pharmacy | 48 High Street | Elgin | Moray | IV30 1BU |  |  |
| Lloyds Pharmacy | 453-455 Great Northern Road | Woodside | Aberdeen | AB24 2EH |  |  |
| Lloyds Pharmacy | Unit 26, Westhill Shopping Centre | Westhill | Aberdeenshire | AB32 6RL |  |  |
| Tarland Pharmacy | 1 The Square | Tarland | Aberdeenshire | AB34 4YL |  |  |
| Newtonhill Pharmacy | 1 Skateraw Road | Newtonhill | Aberdeenshire | AB39 3PU |  |  |
| Clear Pharmacy | 3 Alford Place |  | Aberdeen | AB10 1YD |  |  |
| Charles Michie Pharmacy | 67 High Street | Banchory | Aberdeenshire | AB31 5TJ |  |  |
| Charles Michie Pharmacy | Old Village Road | Portlethen | Aberdeenshire | AB12 4JS |  |  |
| Clear Pharmacy | 99 High Street | Forres | Moray | IV36 1AA |  |  |
| Albyn Pharmacy | 156 Union Grove |  | Aberdeen | AB10 6SR |  |  |
| Strachan Pharmacy | 69 High Street | Banff | Aberdeenshire | AB45 1AN |  |  |
| Dufftown Pharmacy | 15 Balvenie Street | Dufftown | Moray | AB55 4AB |  |  |
| New Deer Pharmacy | 14-16 Main Street | New Deer | Aberdeenshire | AB53 6TA |  |  |
| Baird's Pharmacy | 302-304 Clifton Road | Woodside | Aberdeen | AB24 4HP |  |  |
| Gardner Drive Pharmacy | 68 Gardner Drive | Kincorth | Aberdeen | AB12 5SD |  |  |
| Ferryhill Pharmacy | 9 Millburn Street | Ferryhill | Aberdeen | AB11 6SS |  |  |
| Holburn Pharmacy | 560 Holburn Street |  | Aberdeen | AB10 7LJ |  |  |
| Buckpool Pharmacy | 12 St Andrews Square | Buckie | Moray | AB56 1BU |  |  |
| Peterculter Pharmacy | 187 North Deeside Road | Peterculter | Aberdeen | AB14 0UJ |  |  |
| Tarves Pharmacy | 8 Duthie Road | Tarves | Aberdeenshire | AB41 7JX |  |  |
| Rothes Pharmacy | 26-28 High Street | Rothes | Moray | AB38 7AU |  |  |
| E I Mackie | 7 Ramsay Crescent | Garthdee | Aberdeen | AB10 7BL |  |  |
| Charles Michie Pharmacy | 57 King Street | Inverbervie | Aberdeenshire | DD10 0RB |  |  |
| Charles Michie Pharmacy | 24 High Street | Laurencekirk | Aberdeenshire | AB30 1AB |  |  |
| Charles Michie Pharmacy | 391 Union Street |  | Aberdeen | AB11 6BX |  |  |
| Charles Michie Pharmacy | 24 Market Square | Stonehaven | Aberdeenshire | AB39 2BE |  |  |
| Charles Michie Pharmacy | 287 Rosemount Place | Rosemount | Aberdeen | AB25 2YB |  |  |
| ASDA Pharmacy | Jesmond Drive, Middleton Park | Bridge of Don | Aberdeen | AB22 8WQ |  |  |
| your local Boots pharmacy | Unit 16 Greenfern Place | Mastrick Shopping Centre | Aberdeen | AB16 6JR |  |  |
| Normac Pharmacy | Ardach Health Centre, Highfield Road | Buckie | Moray | AB56 1JE |  |  |
| Superdrug Pharmacy | Unit E1 St Nicholas Shopping Centre |  | Aberdeen | AB10 1HW |  |  |
| Taylor's Pharmacy | 1 High Street | Buckie | Moray | AB56 1AL |  |  |
| Peterhead Health Centre Consortium | Links Terrace | Peterhead | Aberdeenshire | AB42 2XA |  |  |
| John Ross (Chemists) Ltd | 37-39 Station Road | Ellon | Aberdeenshire | AB41 9AR |  |  |
| John Ross (Chemists) Limited | Fyvie Post Office | Fyvie | Aberdeenshire | AB53 8JP |  |  |
| George Ellis | 1 Seafield Street | Portsoy | Aberdeenshire | AB45 2QL |  |  |
| Abbotswell Pharmacy | 2 Abbotswell Crescent | Kincorth | Aberdeen | AB12 5AR |  |  |
| TESCO Pharmacy | Tesco Superstore, The Parkway | Bridge of Don | Aberdeen | AB22 8HB |  |  |
| Websters Pharmacy | 7-9 Queen Street | Peterhead | Aberdeenshire | AB42 1TN |  |  |
| Robert Whitelaw (Aberdeen) Ltd | 3 Waverly Place |  | Aberdeen | AB10 1XH |  |  |
| Burghmuir Pharmacy | 2A Burghmuir Drive | Inverurie | Aberdeenshire | AB51 4GY |  |  |
| Robert Whitelaw (Aberdeen) Ltd | 46 Rosemount Viaduct | Rosemount | Aberdeen | AB25 1NT |  |  |
| Dickies Pharmacy | 44 Moir Green | Northfield | Aberdeen | AB16 7GS |  |  |
| Robert Whitelaw (Aberdeen) Ltd | 108 Victoria Street | Dyce | Aberdeen | AB21 7AU |  |  |
| ASDA Pharmacy | Asda Superstore, Portlethen Shopping Centre | Portlethen | Aberdeenshire | AB12 4XP |  |  |
| your local Boots pharmacy | Glassgreen Centre, 2 Thornhill Road | Elgin | Moray | IV30 6GQ |  |  |
| John Ross (Chemists) Ltd | 1 The Square | Kintore | Aberdeenshire | AB51 0UA |  |  |
| John Ross (Chemists) Ltd | 109 Hayton Road |  | Aberdeen | AB24 2RN |  |  |
| Boots Pharmacy | Foresterhill Health Centre | ARI, Westburn Road | Aberdeen | AB25 2UZ |  |  |
| John Ross (Chemists) Ltd | 34 Queen Street | Lossiemouth | Moray | IV31 6PJ |  |  |
| Robert Whitelaw (Aberdeen) Ltd | 68 Victoria Road | Torry | Aberdeen | AB11 9DS |  |  |
| Lloyds Pharmacy | 9-11 Inverurie Road | Bucksburn | Aberdeen | AB21 9LJ |  |  |
| Lloyds Pharmacy | 157 Duff Street | Macduff | Aberdeenshire | AB44 1TL |  |  |
| Lloyds Pharmacy | 23a Clifton Road | Lossiemouth | Moray | IV31 6DJ |  |  |
| Clark's Pharmacy | 12-18 Regent Street | Keith | Moray | AB55 5DU |  |  |
| your local Boots pharmacy | 27 Scotstown Road | Bridge of Don | Aberdeen | AB22 8HH |  |  |
| Strachan Pharmacy | 29 Main Street | Turriff | Aberdeenshire | AB53 4AB |  |  |
| Kemnay Pharmacy Ltd | 17 High Street | Kemnay | Aberdeenshire | AB51 5NB |  |  |
| your local Boots pharmacy | 88/94 High Street | Forres | Moray | IV36 1NX |  |  |
| Largue Pharmacy | 10-12 Gordon Street | Huntly | Aberdeenshire | AB54 8AJ |  |  |
| Boots the Chemists Ltd | Unit 1 Garthdee Retail Park | Garthdee | Aberdeen | AB10 7QA |  |  |
| Rowlands Pharmacy | The Square | Mintlaw | Aberdeenshire | AB42 5EH |  |  |
| Rowlands Pharmacy | 32 Market Street | Ellon | Aberdeenshire | AB41 9JD |  |  |
| Rowlands Pharmacy | 381a North Deeside Road | Cults | Aberdeen | AB15 9SX |  |  |
| Will Chemists (Inverurie) Ltd | 35 West High Street | Inverurie | Aberdeenshire | AB51 9QQ |  |  |
| Rowlands Pharmacy | City Hospital, Park Road |  | Aberdeen | AB24 5AU |  |  |
| Rowlands Pharmacy | 695 George Street |  | Aberdeen | AB25 3XP |  |  |
| Rowlands Pharmacy | 10 Byron Square | Northfield | Aberdeen | AB16 7LL |  |  |
| Douglas Dickie Chemist | 96 Victoria Road | Torry | Aberdeen | AB11 9DU |  |  |
| Dickies Pharmacy | Kingswood Drive | Kingswells | Aberdeen | AB15 8SB |  |  |
| Websters Pharmacy | 4 Hilton Drive | Hilton | Aberdeen | AB24 4NU |  |  |
| Buchanhaven Pharmacy | 23 Skelton Street | Peterhead | Aberdeenshire | AB42 1HR |  |  |
| Meldrum Pharmacy | 37 Market Square | Oldmeldrum | Aberdeenshire | AB51 0AA |  |  |
| Lloyds Pharmacy | 12a Arnhall Business Park | Westhill | Aberdeenshire | AB32 6SN |  |  |
| Parkhead Pharmacy | 18 Grant Street | Burghead | Moray | IV30 5UE |  |  |
| Parkhead Pharmacy | 26 Harbour Street | Hopeman | Moray | IV30 5RU |  |  |
| John Ross (Chemists) Ltd | 17 Oldmeldrum Road | Newmachar | Aberdeenshire | AB21 0PJ |  |  |
| Morrisons Pharmacy | 215 King Street |  | Aberdeen | AB24 5DA |  |  |
| Websters Pharmacy | 86A High Street | New Pitsligo | Aberdeenshire | AB43 6NN |  |  |
| Websters Pharmacy | 45 High Street | Strichen | Aberdeenshire | AB43 6SQ |  |  |
| Aberchirder Pharmacy | 55 Main Street | Aberchirder | Aberdeenshire | AB54 7ST |  |  |
| Dickies Pharmacy | Unit 3, Rowan Drive | Balmedie | Aberdeenshire | AB23 8SW |  |  |
| Braemar Pharmacy | 23 Mar Road | Braemar | Aberdeenshire | AB35 5YP |  |  |
| Summerhill Pharmacy Ltd | Unit 16 Langstracht Shopping Centre | Summerhill | Aberdeen | AB15 6TW |  |  |
| Braehead Pharmacy | Braehead Way Shopping Centre | Bridge of Don | Aberdeen | AB22 8RR |  |  |
| Cruden Pharmacy | Aulton Road | Cruden Bay | Aberdeenshire | AB42 0NJ |  |  |
| Lhanbryde Pharmacy | 32 St Andrews Road | Lhanbryde | Moray | IV30 8NZ |  |  |
| Bairds Pharmacy | 11 Castle Street | Banff | Aberdeenshire | AB45 1DH |  |  |
| Cullen Pharmacy | 28-30 Seafield Street | Cullen | Moray | AB56 4RS |  |  |
| Clear Pharmacy | 83 High Street | Forres | Moray | IV36 1AA |  |  |