# Independent Prescriber Pathfinder Programme in Community Pharmacy

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| **Data Controller(s)** | Humber & North Yorkshire Integrated Care Board &  The Community Pharmacies participating in the IP Pathfinder Programme across Humber & North Yorkshire |
| **Purpose** | NHS England is developing a programme of pilot sites, referred to as 'pathfinder' sites, across integrated care systems enabling a Pharmacist Independent Prescriber to support primary care clinical services from a community pharmacy setting.  As part of the programme, the ICB along with all ICBs implementing Pathfinder in their regions, will   * support the NHS England commissioned evaluation partner (Academic University) where needed and provide access to anonymised and aggregated activity data * require activity level data to support the community pharmacy monthly claims process (in relation to the IP sessions delivered) * to support equality monitoring audit and performance monitoring by the ICB. |
| **Type of information Used** | **Pseudonymised data** – The ICB processes pseudonymised data which may include the following data items - age, gender, postcode district, patient initials, presenting condition, prescribed medication, registered GP.  **Potentially identifiable** – the ICB will process pharmacy details and staff names which are potentially identifiable to process claims. |
| **Legal basis** | **Article 6 1 (e)** of the UK GDPR: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.  **Article 9 2 (h)** of the UK GDPR:  processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of domestic law.  **Common Law Duty of Confidentiality:**  In order to satisfy the Common Law Duty of Confidentiality:  The pharmacy contractor and/or the pharmacist independent prescriber delivering the service will be required to obtain consent from the person eligible to receive the service for the following purposes:  To participate in the pathfinder programme and agree to a consultation and clinical review in line with the service specification. To share referral advice and shared decisions with the person’s registered general practice.To share demographic and clinical data People accessing the service will be asked in the pharmacy if they consent to being contacted by a service evaluation team to complete a service user survey and/or interview. If a person does not consent to participate in the service evaluation, they can still access the service. |
| **How we collect (the source) and use the information** | **IP Pathfinder Direct Care:**  Patient identifiable data will be collected electronically directly onto the PharmOutcomes system by the Pharmacist Independent Prescribers, during patient consultation, within the Community Pharmacy.  It will also be collected by the Pharmacist Independent Prescribers using the EPS IT system to generate an electronic prescription for the patient during the consultation taking place within the Community Pharmacy.  As part of the consultation by the Pharmacist Independent Prescribers, they are likely to access the patients record.  **Secondary Uses of IP Pathfinder Data:**  •NHS England commissioned evaluation  •monthly claims process (in relation to the IP sessions delivered)  •equality monitoring, audit and performance monitoring by the ICB  Data will be collected through requests being made by the ICB to Community Pharmacy West Yorkshire (who are contracted by WY ICB on behalf of NHS Humber & North Yorkshire ICB to extend their existing contract with PharmOutcomes to include the patient consultation and GP post event notification). Community Pharmacy West Yorkshire will in turn use their existing reporting access to the PharmOutcomes system to configure bespoke de identified reports to support the secondary use purposes detailed above.  As part of the NHS England commissioned evaluation, NHS England are requesting that Pharmacist Independent Prescribers (PIPs) to fill out a short anonymous form after each patient consultation. ICBs are provided by NHS England with a summarised version of that data collection for the purposes of the ICBs own internal programme evaluation and monitoring. |
| **Data Processors** | [Community Pharmacy West Yorkshire (CPWY)](https://www.cpwy.org/)  [PharmOutcomes](https://www.emishealth.com/privacy-policy) |
| **Your Rights** | * To be informed about the processing of your information (this notice) * Of access to the information held about you * To have the information corrected in the event that it is inaccurate * To object to it being processed or used * Not to be subject to automated decision-taking or profiling * To be notified of data breaches |
| **How long we will keep the information** | **IP Pathfinder Direct Care:**  The records entered onto PharmOutcomes by providers remain their data because it can form part of a clinical record for a healthcare professional/provider. This information is held by PharmOutcomes under the current NHS guidelines (Records Management NHS Code of Practice 2016).  **Secondary Uses of IP Pathfinder Data:**  Secondary use data will be held by CPWY in line with the requirements of the PharmOutcomes Service Administration Agreement.  Pseuonymised row level data held by the ICB will be destroyed following the end of the Pathfinder programme (April 2025) once the evaluation report has been published by NHS England. |
| **Who we will share the information with (recipients)** | [NHS England](https://www.england.nhs.uk)  [University of Manchester](https://www.manchester.ac.uk/) (commissioned to complete formative evaluation of IP Pathfinder Programme nationally) |