

NHS Grampian and Community Pharmacies

Information Governance – Data Protection

Community Pharmacy Prescribing (CoPPr)

What is happening and how is my data being used?

CoPPr is software developed by NHS Grampian which allows an authenticated electronic prescription to be sent to community pharmacies in the Grampian region.

It is based on the Core Discharge Document (CDD) product, which is in use currently and routinely shared with community pharmacies for consenting patients.

CoPPr is designed to replace the need to send a paper prescription to community pharmacies. Clinicians will be able to send electronic prescriptions directly to pharmacies to facilitate timely access to medication.

This is especially important in situations where patients access health services remotely (either by video call, telephone call or other consultation platform).

Prescribers that will access the system include community optometrists and dentists with NHS contracts. The product will also be used by directly employed NHSG staff in clinical specialties.

The system is hosted in by NHS Grampian data centres and requires any user to have authenticated access to NHS Grampian's systems.

Personal data and Special categories of personal data

The information processed in COPPR is your name, date of birth and CHI number (all used to identify you) and your health data. Specifically, the medications prescribed to you and an indication of the condition for which they have been prescribed. This is a safety measure as the same drug can be used for treating different conditions, and the dose and duration can vary according to the condition being treated.

Data controller

NHS Grampian is the data controller for the information shared with your pharmacist from the COPPR system where it resides in our systems. It is retained in the same way as the other medical information we hold about you. Please see our full privacy notice for more information - https://foi.nhsgrampian.org/globalassets/foidocument/foi-public-documents1---all-documents/nhs_grampian_data_protection_notice.pdf.

When the prescription is passed to a community pharmacy via the COPPR system, the community pharmacy becomes the data controller for that information. You should consult their privacy notice for information on how they use and retain your data.

Lawful processing

We assert that it is lawful for us to process your personal data in this way as:

- 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;
- processing [may be] necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for compliance with a legal obligation to which the controller is subject.

We assert that it is lawful for us to process special categories of your personal data in this way as:

- 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 Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards...;
- processing [may be] necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- processing [may be] necessary for reasons of public interest in the area of public health...
- processing [may be] necessary for the establishment, exercise or defence of legal claims...

Your rights

We respect your rights and preferences in relation to your data. If you wish to update, access, erase, limit, or complain about the use of your information, please let us know by emailing

nhsg.infogovernance@nhs.net in the first instance and we will consider your questions. You may also wish to contact your community pharmacy or the Information Commissioner's Office.