April 2021

PSNC Briefing 008A/21: Five steps for Data Security and Protection Toolkit completion (2020/21)

This briefing has been designed to help community pharmacy contractors with completing the Data Security and Protection Toolkit ('Toolkit'). It should be used alongside **Toolkit: Question-by-question PSNC guidance** to complete the Toolkit no later than the deadline on **30th June 2021 .**

Background

Contractors are required to give information governance assurances to the NHS each year via the online self-assessment **Toolkit**.[1] The Toolkit questions align with the **General Data Protection Regulation (GDPR)** and the National Data Guardian's **Ten Data Security Standards**.

Five steps to complete the Toolkit submission

1. Login to the Toolkit

Use your login details from last year to **login to the Toolkit**.[2]

2. Update information on your Toolkit 'Organisation Profile' webpage

a) **Confirm once you have refreshed your Community Pharmacy GDPR Workbook** Part 3 ('**GDPR WB**'). PSNC led the cross-sector Community Pharmacy GDPR Working Party and produced **GDPR guidance**. If you completed the GDPR WB and have reviewed it this year in case changes were required, then you may confirm completion and type or write an updated (review) date on the front or back. If GDPR WB is marked as completed then around half of the mandatory questions will be automatically marked as 'completed'.

b) **Confirm who your Data Protection Officer (DPO) is**. PSNC recommends an internal **DPO** for their local knowledge but the reasoning for staff selection and any later conflicts can be noted as per the guidance[3].

c) **Confirm that NHSmail is the only email system** that **the pharmacy uses to transfer patient information** so that two Toolkit questions about email will be automatically marked as 'completed'.

d) **Confirm if you have a Caldicott Guardian** (not mandatory).[3]

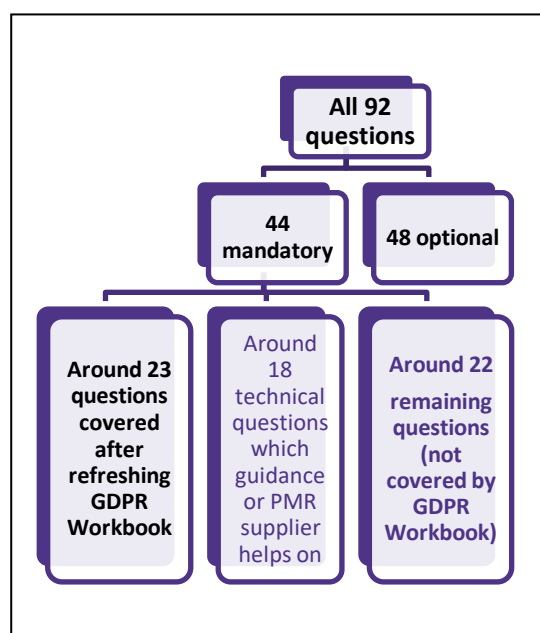You can return to the Organisation Profile webpage to update this.

3. Consider whether all staff have had appropriate training within the last year

Toolkit question 3.2.1 asks: "*Have at least 95% of all staff, completed their annual Data Security awareness training*" and the Tip refers to 'local materials' as being acceptable. NHS Digital has confirmed to PSNC that this question can

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[1] Note: The relevant links are listed at **psnc.org.uk/tk** if you are using a printed copy of this briefing.

[2] The Toolkit's login page, if needed. If you need to register: First register on **the Toolkit registration page** in sufficient time so that you can complete it before **30th June 2021**. You will need an email address (NHSmail or otherwise), your ODS (F) code, and a few minutes for the registration process. Once you have obtained your login credentials login to the Toolkit. The primary user can link other users.

[3] For related guidance see: **psnc.org.uk/dsroles**

Side diagram:

All 92 questions
- 44 mandatory
  - Around 23 questions covered after refreshing GDPR Workbook
  - Around 18 technical questions which guidance or PMR supplier helps on
- 48 optional
  - Around 22 remaining questions (not covered by GDPR Workbook)

be marked as complete if equivalent annual training takes place including the **Pharmacy data security and IG training (for induction or refreshment)** or **GDPR guidance for Community Pharmacy (Part 2) staff training booklet**. This can be re-circulated and you could ask staff to sign to confirm that they have reviewed it. Some contractors also have an annual staff training session in which data security matters are discussed including opportunities to improve further in the coming year. You must ensure 95% of **all** current staff have been re-trained within the Toolkit period.

4. Consider the Toolkit Headquarters (HQ) 'batch submission' feature and check the correct pharmacies are listed against your HQ code

Pharmacy organisations with three or more pharmacies may benefit from using the Toolkit 'HQ batch submission' feature to complete a single submission if the standards are coordinated across branches. You can register and begin completion of a 'master' submission. If you have three or more pharmacies, read **Toolkit: Using the Data Security and Protection Toolkit's HQ batch submission feature: step-by-step guide**. This explains that: (1) you could immediately check whether your HQ code is connected to the correct pharmacies using the ODS portal and the Toolkit Headquarters feature webpages; and that (2) you may need to request that the HQ feature is turned on by sending a request to the Exeter helpdesk.

5. Visit the Toolkit Assessment section and use PSNC's guidance to help you complete the remaining mandatory questions (including all the technical questions)

Click into the 'Assessment' section of the Toolkit and use the filtering options on the top-right of the screen, to display the mandatory questions. Some questions will include your previous answers but you still need to review these answers before they are marked as complete. The 'optional' questions do not require completion and it is recommended that you only consider these if you are fully satisfied with all your mandatory answers.

Use the **Question-by-question PSNC Toolkit guidance** (pdf or spreadsheet versions available) for the remaining mandatory questions. Work your way down the Toolkit questions from top to bottom completing the mandatory questions not marked 'completed'. You may wish to start with new or reworded questions before going back to review answers from your last submission. It is the contractor's decision whether to include sensitive information in these answers. For some of your answers you may state that the information requested is within a certain document where that is the case (e.g. *Template 6 "Asset Register"* at **psnc.org.uk/dstemplates**), in place of disclosing potentially sensitive information.

Note about technical questions: PSNC has been working with PMR suppliers on some Toolkit matters. We expect PMR suppliers to provide information to support your completion of up to 18 technical questions in a variety of ways, e.g. via guidance documents or their helpdesk. Some PMR suppliers may choose to utilise the improved **Toolkit PMR feature**. This feature involves your PMR supplier setting up an email address (e.g. igsupport@pmr.com) to be entered by you (within the 'Admin'>'User List' section of the Toolkit, as a 'Member') so that some information can be bulk-inserted for the mandatory technical questions. This is likely to be at a pre-set time of which your PMR supplier will advise you. You will be able to add or amend the answers entered by your PMR supplier to include more information after the final bulk-insertion, if needed. As a 'Member' your PMR supplier would technically have visibility of answers but would need to promise in writing not to collect, read or review these. You are advised <u>not</u> to wait for your PMR supplier to use the Toolkit PMR feature in case they choose not to use the feature this year.

Further support and information

Additional guidance for dealing with <u>all</u> Toolkit questions can be found at: **Toolkit completion: Question-by-question guidance (all)**. Read more at: **psnc.org.uk/ds**, **psnc.org.uk/dsfaqs** and **dsptoolkit.nhs.uk/help**. Requests for technical support can also be made by to **exeter.helpdesk@nhs.net** or 0300 3034034. If you have queries on this PSNC Briefing, please contact **Daniel Ah-Thion, Community Pharmacy IT Lead** or **it@psnc.org.uk**.

Note: PSNC and NHS Digital collaborated on some Toolkit work. NHS Digital has informally endorsed information within this guidance. Toolkit completion doesn't equal auto-alignment to **Warranted Environment Specification (WES)**.