

Briefing: Five-step checklist for completing the Data Security and Protection Toolkit

This briefing is designed to assist community pharmacy teams in completing the Data Security and Protection Toolkit (referred to as 'Toolkit') before the deadline on 30th June 2024. It is recommended to use this briefing in conjunction with <u>Community Pharmacy</u> England's guidance on the Toolkit.

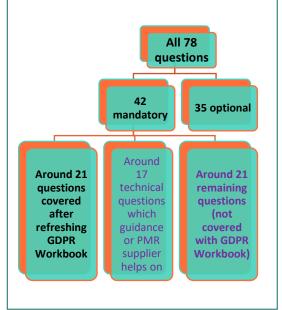
Pharmacy owners are required to provide information governance assurances to the NHS on an annual basis by completing the online self-assessment <u>Toolkit</u>.¹ The questions in the Toolkit align with the <u>General Data Protection Regulation (GDPR)</u> and the National Data Guardian's <u>Ten Data Security Standards</u>.

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 the information on your Toolkit 'Organisation Profile' webpage



- a) Ensure that you have refreshed your Community Pharmacy GDPR Workbook Part 3 ('GDPR WB'). Community Pharmacy England led the cross-sector Community Pharmacy GDPR Working Party and produced GDPR guidance, which can be found in the GDPR WB. If you have completed and reviewed the GDPR WB this year, you can confirm completion by typing or writing an updated (review) date on the front or back. If GDPR WB is marked as completed, then you can 'paste' into around half of the mandatory Toolkit questions 'See GDPR WB' answers.
- **b)** Confirm the identity of your Data Protection Officer (DPO).. Community Pharmacy England recommends an internal <u>DPO</u> for their local knowledge, but the reasoning for staff selection and any later conflicts can be noted per the guidance³.
- c) Confirm that <u>NHSmail</u> is the only email system that the pharmacy uses to transfer patient information so that the Toolkit questions about email will be automatically marked 'complete'.
- 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 members have received appropriate training within the past year.

Toolkit question 3.2.1 asks: "Have at least 95% of all staff completed on data security?". The tip links to pharmacy guidance materials such as <u>cpe.org.uk/dstraining</u>. Training can be re-circulated, and staff can sign to confirm that they have reviewed it. Some pharmacy teams also hold annual staff training session to discuss data security matters and identify opportunities for improvement in the coming year. It is essential to ensure that 95% of <u>all</u> current staff members have been (re-)trained within the Toolkit period.

4. Consider the Toolkit Parent Organisation Code (POC/HQ) 'batch submission' feature and check the correct pharmacies are listed against your POC

¹Note: The relevant links are listed at <u>cpe.org.uk/tk</u> if you are using a printed copy of this briefing.

² The Toolkit's login page. If you need to register: First register on <u>the Toolkit registration page</u> in sufficient time so that you can complete it before <u>30th June 2024</u>. 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: <u>cpe.org.uk/dsroles</u>



If you own three or more pharmacies, you may benefit from using the Toolkit '<u>POC</u> batch submission' feature, which allowsfor a single 'master' submission for all pharmacies if the standards are coordinated across each branch. To understand the process, read the <u>Toolkit: Using the Data Security and Protection Toolkit's POC</u> <u>batch submission feature: step-by-step guide</u>. This guide explains how to check if your POC is connected to the correct pharmacies using the ODS portal and the Toolkit POC feature webpages. Additionally, you may need to request the activation of the POC feature by contacting the Exeter helpdesk.

5. Visit the Toolkit Assessment section and refer to Community Pharmacy England's guidance to assist you in completing the remaining mandatory questions, including all the technical questions.

Access the 'Assessment' section of the Toolkit and utilise the filtering options on the top-right of the screen to display the mandatory questions. Some questions will display your previous answers, but you must review them to mark them as complete. The 'optional' questions do not require completion, and it is recommended to consider them only if you are fully satisfied with all your mandatory answers.

Use the <u>Question-by-question Community Pharmacy England Toolkit guidance</u> (available in PDF or spreadsheet formats) to answer the remaining mandatory questions. Work through the Toolkit questions from top to bottom, ensuring that the mandatory questions not marked 'completed' are addressed. You may choose to begin with new or reworded questions before reviewing your answers from your previous submission. It is up to the contractor's discretion whether to include sensitive information in these answers. For some of your answers, you may state that the information requested can be found within a particular document where this is the case (e.g. *Template 6 "Asset Register"* at <u>cpe.org.uk/dstemplates</u>) instead of disclosing what could be considered as potentially sensitive information.

For technical questions, Community Pharmacy England has worked closely with PMR suppliers on various Toolkitrelated matters. We expect PMR suppliers to provide information to support your completion of up to 18 of the Toolkit's technical questions in multiple ways, e.g. via guidance documents or their helpdesk. Some PMR suppliers may choose to utilise the improved <u>Toolkit PMR feature</u>. 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 will likely occur at a pre-set time, which your PMR supplier will advise. You can 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 all the 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 if they choose not to use it this year.

Further support and information

Additional guidance for dealing with <u>all</u> Toolkit questions can be found at <u>Toolkit completion: Question-by-</u> <u>question guidance (all)</u>. Read more at: <u>cpe.org.uk/ds</u>, <u>cpe.org.uk/dsfaqs</u> and <u>dsptoolkit.nhs.uk/help</u>.

Requests for technical support can also be made to <u>exeter.helpdesk@nhs.net</u> or 0300 3034034.

If you have questions about this Community Pharmacy England Briefing, please contact <u>Daniel Ah-Thion</u>, <u>Community Pharmacy IT Policy Manager</u>, <u>it@cpe.org.uk</u>, or <u>Katrina Worthington</u>, <u>Regulations Officer</u>.

Note: Community Pharmacy England has collaborated with the DSPTK team on some of our Toolkit guidance, and the DPSTK team has informally endorsed the information contained within this guidance. Please note that Toolkit completion does not equal auto-alignment to <u>Warranted</u> <u>Environment Specification (WES)</u>.

Read Community Pharmacy England's step by step guide:

Preparing for and using the Toolkit HQ batch feature