

May 2022

## PSNC Briefing 15A/22: Five step checklist for completing the Data Security and Protection Toolkit

This briefing assists 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 ahead of the deadline on **30th June 2022**.

### Background

Contractors are required to give information governance assurances to the NHS annually via the online self-assessment **Toolkit**.<sup>1</sup> The Toolkit questions align with **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**.<sup>2</sup>

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

- Confirm that you have refreshed your Community Pharmacy GDPR Workbook Part 3 ('GDPR WB')**. PSNC led the cross-sector Community Pharmacy GDPR Working Party and produced the following **GDPR guidance**. If you have completed and reviewed the GDPR WB this year, which includes marking any staff and contract changes or other changes, you can confirm completion and should type or write an updated (review) date on the front or back. If GDPR WB is marked as completed then about half of the mandatory questions will be automatically marked as 'completed' in the Toolkit.
- 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<sup>3</sup>.
- Confirm that NHSmail is the only email system that the pharmacy uses to transfer patient information** so that the two Toolkit questions about email will be automatically marked 'complete'.
- Confirm if you have a Caldicott Guardian** (not mandatory).<sup>3</sup>

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

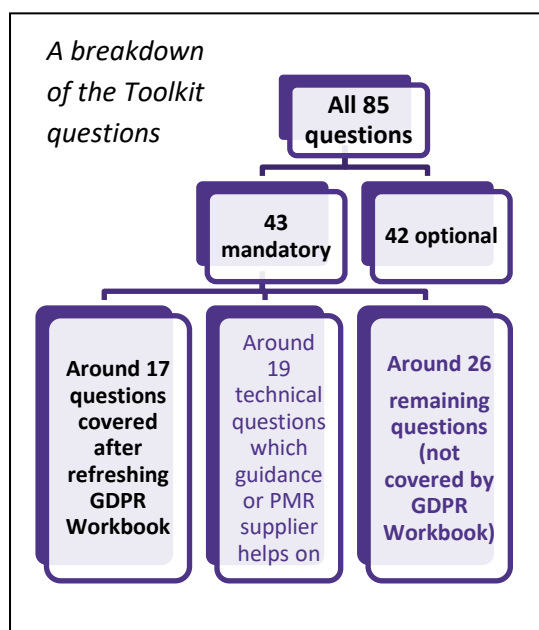
#### 3. Consider whether all staff have had appropriate training within the last year

Toolkit question 3.2.1 asks: "Have at least 95% of all staff completed **training on data security**". The tip links to pharmacy guidance such as the **Pharmacy data security and IG training (for induction or refreshment)** or **GDPR**

<sup>1</sup> Note: The relevant links are listed at [psnc.org.uk/tk](https://psnc.org.uk/tk) if you are using a printed copy of this briefing.

<sup>2</sup> 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 2022**. 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.

<sup>3</sup> For related guidance see: [psnc.org.uk/dsroles](https://psnc.org.uk/dsroles)



[guidance for Community Pharmacy \(Part 2\) staff training booklet](#). Training can be re-circulated and you can 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 Parent Organisation Code (POC/HQ) 'batch submission' feature and check the correct pharmacies are listed against your POC

Pharmacy organisations with three or more pharmacies may benefit from using the Toolkit '[POC](#) batch submission' feature. This feature allows contractors to complete a single 'master' submission for all their pharmacies if the standards are coordinated across each branch. If you have three or more pharmacies, you should read the following: [Toolkit: Using the Data Security and Protection Toolkit's POC batch submission feature: step-by-step guide](#). This guidance explains that: (1) you can instantly check if your HQ code is connected to the correct pharmacies using the ODS portal and the Toolkit POC feature webpages; and that (2) you may need to request that the POC 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 can be found within a certain document where this is the case (e.g. *Template 6 "Asset Register"* at [psnc.org.uk/dstemplates](https://psnc.org.uk/dstemplates)), instead of disclosing what might be potentially sensitive information.

**Note about technical questions:** PSNC has been working closely with PMR suppliers on various Toolkit related matters. We expect PMR suppliers to provide information to support your completion of up to 19 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](mailto: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 take place at a pre-set time of which your PMR supplier will advise. 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 all the answers but would need to promise in writing not to collect, read or review these. You are advised not 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 all Toolkit questions can be found at: [Toolkit completion: Question-by-question guidance \(all\)](#). Read more at: [psnc.org.uk/ds](https://psnc.org.uk/ds), [psnc.org.uk/dsfags](https://psnc.org.uk/dsfags) and [dsptoolkit.nhs.uk/help](https://dsptoolkit.nhs.uk/help). Requests for technical support can also be made to [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) or 0300 3034034. If you have queries on this PSNC Briefing, please contact [Daniel Ah-Thion, NHS Community Pharmacy IT Policy Manager](#) or [it@psnc.org.uk](mailto:it@psnc.org.uk).

Note: PSNC has collaborated with NHS Digital on some of our Toolkit guidance. NHS Digital has informally endorsed information within this guidance. Toolkit completion doesn't equal auto-alignment to [Warranted Environment Specification \(WES\)](#).