

GDPR update for community pharmacies

As the requirements of GDPR are UK wide CPW will be signposting contractors in Wales to the comprehensive support provided by PSNC. The following is the latest update from PSNC.

PSNC UPDATE: With the introduction of new data protection legislation on the horizon, PSNC outlines the support being made available to help contractors with compliance.

Community pharmacy contractors should be aware that the General Data Protection Regulation (GDPR) is approaching – all organisations must comply with the GDPR by 25th May 2018. The GDPR and the UK data protection legislation that will accompany it represent an overhaul of data protection legislation and all organisations, including community pharmacy businesses, will need to take steps to ensure that they comply with it.

PSNC, with other stakeholders, is developing a guidance toolkit which will help community pharmacy contractors to comply with the regulation.

The guidance should be ready by the end of March and it will set out the steps that contractors need to take to comply with GDPR, as well as providing templates for contractors to use, and answering key FAQs.

We are working on the guidance with the Community Pharmacy GDPR Working Group (which includes the National Pharmacy Association, the Company Chemists' Association, the Association of Independent Multiple Pharmacies, the Centre for Pharmacy Postgraduate Education and the Royal Pharmaceutical Society) and are liaising with the Information Commissioner's Office and NHS England. Contractors are asked to sign up to PSNC's emails to ensure that they are notified as soon as the guidance becomes available. Sign up at: psnc.org.uk/email

Background information on the GDPR is available on PSNC's website (psnc.org.uk/GDPR) and detailed information is available from the websites for the Information Commissioner's Office (ico.org.uk) and NHS Digital's Information Governance Alliance (digital.nhs.uk/information-governance-alliance).

A summary of the changes for pharmacy

- The need to demonstrate compliance with data protection principles and take other proactive steps for compliance including certain record keeping. For example, if you process personal data by consent (e.g. for direct marketing), the consent you have from data subjects must be GDPR compliant and you must have a record of that consent (before 25th May 2018 for existing data subjects).
- The need for a Fair Processing Notice to explain to data subjects how you process their data – what many are calling a Privacy Notice.

- The need to ensure you have appropriate agreements with those who process personal data for you or those whose personal data you process.
- The most problematic issue for community pharmacy is the Data Protection Officer (DPO). It may be that all

In addition pharmacy contractors will have to appoint a DPO, or, it may be that only those that process data concerning health on a 'large-scale' will have to appoint a DPO. (There is no clear definition of large-scale.) PSNC is working with other pharmacy and primary care organisations to try to limit the number of contractors who must appoint a DPO and, if this is unsuccessful, to ensure the guidance on DPOs is applied pragmatically to community pharmacy.

PSNC to hold GDPR compliance webinars

As we approach the date that all organisations must comply with General Data Protection Regulation (GDPR), PSNC will be holding a webinar for community pharmacies.

Community pharmacy contractors will have two opportunities to tune into a live webinar hosted by PSNC Director of Operations and Support, Gordon Hockey.

During each webinar Gordon will explain what GDPR is, clarify what that means for the average pharmacy business, outline the steps contractors will need to take to comply, and talk you through the templates PSNC has developed as part of a cross-sector GDPR working group.

Gordon will also make sure you know where to find all the relevant resources created for contractors and where you can turn for additional support.

Each webinar is expected to last around 60 minutes with some time devoted to answering your questions; so please tune in to make sure you understand what GDPR means for your pharmacy.

The two webinars are scheduled for Wednesday 4th April and Thursday 12th April, both at 7.30pm.

Please sign up at: psnc.org.uk/webinar