



March 2019

GDPR Compliance

GDPR

Compliance

Dr. Julian Brown
IG Governance Lead

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Prescribing Services Ltd
2 Regis Place
King's Lynn
England
PE30 2JN

Company No: 05913240

Data Protection Registration Number: Z2536678



GPSoC
NHS Digitally assured
NHS England
Section 251 Accredited

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PS/GDPR/220518/NTL/GB

Prescribing Services Ltd

Accreditations & Governance Summary

NHS Digital

Assurance of Prescribing Services Ltd.
Advice & Guidance Service

Phase 1 Assurance December 2016

Phase 2 Assurance October 2017

**Full Rollout Approval (FRA) Certificate
issued Nov 2017**

NHS England Section 251

Prescribing Services are accredited as a supplier
of risk stratification solutions.

GPSoc

Organisation Name: Prescribing Services Ltd
Lot 1 & Lot 2 Qualification

SCCIO129

Organisation Name: Prescribing Services Ltd
Clinical Risk Management

ISO 27001 : 2013

Organisation Name: Prescribing Services Ltd
Certificate Number: 14128929
Original Approval: 29 July 2013
Current Certificate: 22 February 2018
Certificate Expiry: 28 July 2023

ISO 9001 : 2015

Organisation Name: Prescribing Services Ltd
Certificate Number: 14127268
Original Approval: 12 July 2013
Current Certificate: 01 November 2017
Certificate Expiry: 11 July 2023

ISO 14001 : 2015

Organisation Name: Prescribing Services Ltd
Certificate Number: 14127269
Original Approval: 21 August 2013
Current Certificate: 01 November 2017
Certificate Expiry: 20 August 2023

ICO. Data Protection Register

Organisation Name: Prescribing Services Ltd
Registration Reference: Z2536678
Date Registered: 04 February 2011
Registration Expires: 03 February 2020

Information Governance Toolkit

Organisation Name: Prescribing Services Ltd
Organisation Type: Commercial Third Party
Organisation Code: 8HX18
Assessment: Version 13 (2015-2016)
Date Published: 30/03/2016
Date Reviewed: 26/04/2016
Grade: Satisfactory

Approved NHS Health Research Authority database

Scholar (Secure Clinical Hub Leading to Online
Learning And Reporting)
Date Approved: October 2017

GDPR Statement

INTRODUCTION

The European Union's General Data Protection Regulation (GDPR) comes into effect on 25th May 2018 bringing with it wide ranging changes and new responsibilities for organisations that process personal data. These changes will affect all organisations which hold or process personal data, including Prescribing Services Ltd (PSL).

This statement outlines the anticipated impact on PSL and our approach to ensuring our compliance with the new legislation.

ARE WE A DATA CONTROLLER OR A DATA PROCESSOR?

A 'data controller' is an entity that controls how and why personal data is processed and a 'data processor' uses, handles or works with the data under the instruction of the controller. Therefore, PSL is a data processor for existing data privacy legislation and GDPR. PSL is also a data controller in that we store and manage data about our customers, suppliers and staff.

HOW DOES THE GDPR AFFECT US?

The GDPR affects PSL in its capacity as a data controller for the information we store and manage about our customers, suppliers and staff. However, our core business is providing patient safety and risk stratification software solutions for the NHS. In this respect we process data under the instruction of a data controller and therefore we are a data processor. Consequently, we must take heed and be compliant with the requirements for both data controllers and processors.

HOW ARE WE BECOMING COMPLIANT?

PSL has always taken its responsibility for information security and data protection seriously. Consequently, we have always operated high standards of information security and data protection and we are committed to maintaining those high standards.

PSL has two main areas of focus in preparing for GDPR:

1. Ensuring our own compliance.
2. Assisting the users of our software applications with their compliance.

OUR COMPLIANCE

Prior to the GDPR, PSL implemented company-wide information security and data protection controls through its ISO certified Information Security Management Systems (ISO27001, 9001, 14001) and has had additional accreditation from NHS Digital and NHS England (Level 1 and 2 Central Assurance, Section 251 Accreditation).

PSL has undertaken an analysis of our existing controls against the GDPR's requirements to understand where they need to be augmented or where additional controls need to be introduced.

PSL has used the output from this analysis to inform and establish a GDPR compliance programme which includes the following key activities:

- A review of all data processing activities including confirmation of our lawful bases and purposes for processing data, where data resides, how data is secured and who can access or change data.
- Refreshing our staff Data Privacy Awareness Training
- Updates to our internal security processes to meet GDPR requirements including processes associated with data subject rights, personal data breach response, privacy by design and third-party compliance
- Updates to internal policies, procedures and privacy notices. A review of the contractual/data sharing terms between PSL and our clients and suppliers
- PSL has also appointed a Data Protection Officer (DPO) with responsibility for advising and monitoring our compliance with all applicable data protection laws.

OUR CLIENTS' COMPLIANCE

PSL is acutely aware that customers trust us and our software solutions to protect their data. We therefore commit to ensuring that the security of our customer's data continues to be at the forefront of everything we do and demonstrating this commitment by continuing to submit our ISMS for external validation against ISO 27001 and other industry standards.

Similarly, customers will need to be confident that PSL can assist them in meeting their GDPR obligations. As such, we are committed to applying the principles of privacy by design and default to our products. This includes providing features within our software that customers can leverage for their own compliance, particularly in relation to data subject rights and data protection impact assessments (DPIAs). We will inform our customers when new features become available.

PSL understands the importance of informing our customers of any incidents or breaches that affect their data. PSL is confident that our technical and organisational measures significantly reduce the risk of data breaches however, in the unfortunate event that a breach does occur, we are prepared to provide timely notification to customers and to assist with any ensuing investigation.

WILL OUR CONTRACTS CHANGE?

GDPR contains a legal requirement obliging organisations to update existing contracts that deal with data protection to a more detailed standard. To comply with this requirement PSL is amending our standard terms which sets out each party's obligations in relation to data protection. In incorporating these updates, the document sets out in more detail, each party's responsibilities in relation to how and for what reason either party is collecting, using or handling personal data.

FURTHER QUESTIONS

If you have any further questions, please contact us at;

enquiries@prescribingservices.org

What Does Prescribing Services Deliver to the NHS: Advice & Guidance (Eclipse Live)

RISK STRATIFICATION

Our systems assist GP practices in identifying those patients needing urgent intervention. Automated patient alerts are highly specific in order to identify patients with genuine reversible risk. These are delivered without the need for patient identifiable information.

ACTIVE MONITORING OF YOUR PATIENTS

Over 10% of your patients need enhanced monitoring, these are often the same patients that do not present at the GP Practice. Through the validated Advice and Guidance (Eclipse Live) service optimal monitoring is supported without the need for patients to present.

LONG TERM CONDITIONS INTERFACE

25% of patients have a long term condition. These patients will benefit from support in delivering appropriate monitoring, treatment targets and remote support. Our digitally assured Diabetes Complete module has enabled our surgeries to obtain best practice compliance. ie. 97% of Key Care Processes

ENHANCED PRESCRIBING SAFETY AND IMPROVED PATIENT OUTCOMES

Advice and Guidance (Eclipse Live) is the only validated system shown to reduce patient admissions and A&E attendances.

REDUCED GP WORKLOAD

Central patient tracking and standardised calls to action enables GPs to delegate workload to their wider team whilst ensuring clinical excellence.

SURGERY VALIDATION AND PROFESSIONAL DEVELOPMENT

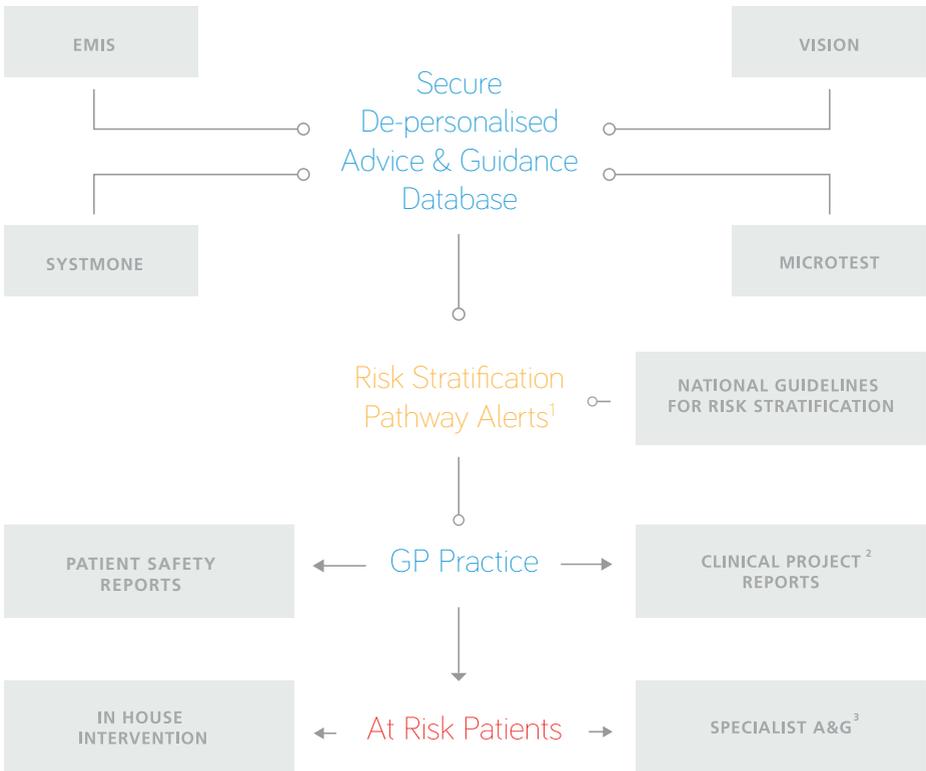
Standardised evaluation of patient outcomes enables optimisation of clinical resources. In addition the reference data can be used for CQC inspections, annual appraisals and re-validation.

All alerts addressed and advice and guidance accessed is logged for each clinician's professional development plan.

How Does Advice and Guidance (Eclipse Live) Work?

Secure data extracts are taken from your principal clinical system either daily or weekly (GP Practice preference).

The centrally assured alerts are run each Sunday and your patients in need of action identified ready for Monday. Patients can be dealt with in house or referred onto your Advice and Guidance team.

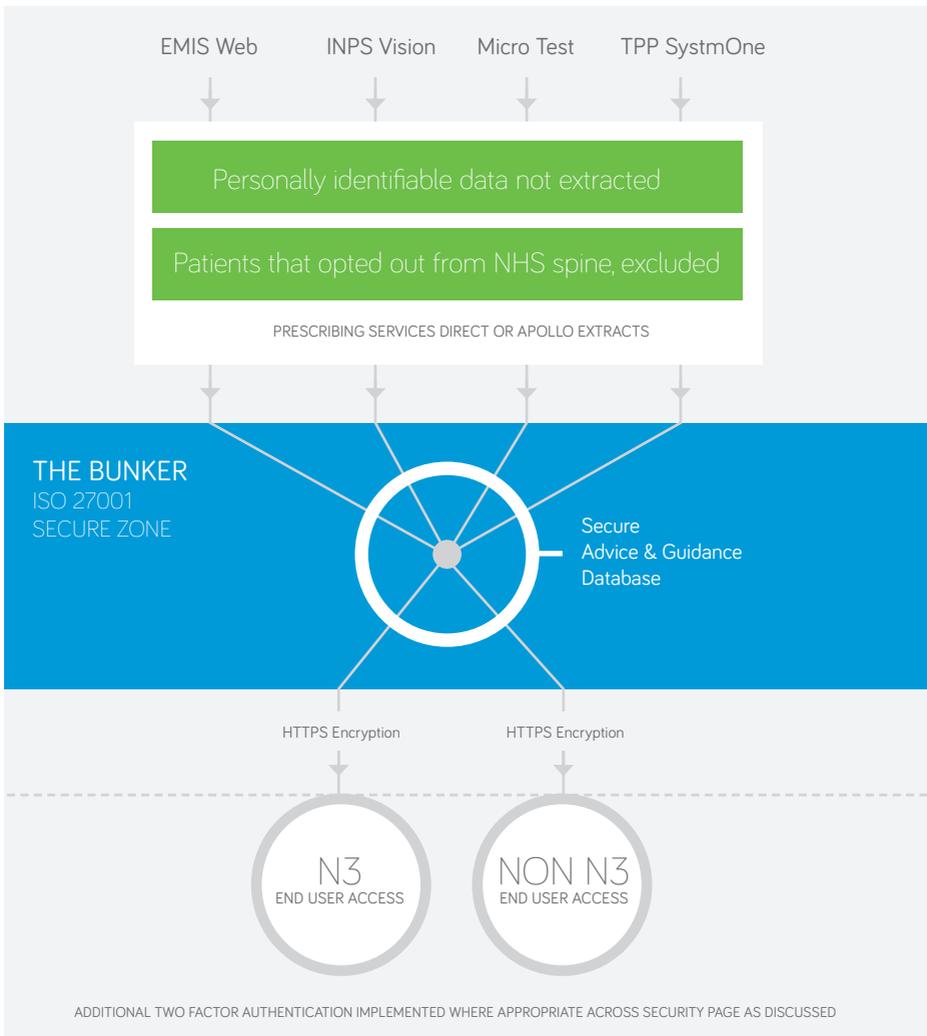


1 – Medication Specific Alerts (Radar) & Condition Specific Alerts (Sonar)

2 – Diabetes Complete

3 – Eclipse24

Technical Specification



- Advice & Guidance (Eclipse Live) is accessed as a secure encrypted website.
- Capable of fully integrating with all GP systems.
- No modifications are required to existing systems.
- The Project is capable of significant expansion within the Trust and within the region.
- No personally identifiable patient data is extracted.
- Any data relating to patients that have opted out of the IT is excluded.
- All data is strongly encrypted (a combination of symmetric and asymmetric encryption algorithms, Triple DES and RSA 1024) before transmission and utilises public and private key pairs unique to each project.

Data Handling and Storage

Data is stored encrypted within the Prescribing Services data centres. These are high security data facilities with dual N3 connectivity.

Only de-personalised data can be accessed through this interface.

Pseudonymised data is stored in a restricted access data centre and is only available within the N3 network with enhanced permission and appropriate consent.

Access Rights

Access is restricted to healthcare professionals with NHS email addresses and 2 factor authentication is mandatory for all users.

Pseudonymised data access is limited to GPs accessing the N3 network for their own patients and approved individuals with appropriate consent.

Integrated Partners

OUR PARTNERS

In order to attain NHS Digital assurance we have ensured our software systems are aligned with the key NHS organisations.



COMPATIBLE WITH



Find Out More

For more information please contact our Data Protection Officer – Stephen Harrington

01553 615555

enquiries@nhspathways.org

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Accredited NHS England
Risk Stratification Supplier

NHS Digital Assured