



# Four key deadlines approaching

A newsletter to aid your compliance with clinical governance requirements

Helping you to complete or work towards completing the clinical governance requirements by 31st March 2019

The end of the financial year (31 March) is approaching and community pharmacy contractors are reminded of four key deadlines relating to the clinical governance aspects of their terms of service.

The clinical governance requirements of the Community Pharmacy Contractual Framework (CPCF) cover a range of quality related issues. Adherence with the clinical governance requirements is a part of your terms of service.

The LPC urges contractors to ensure that they have completed, or are working towards completing, the clinical governance requirements highlighted below to meet the end of year deadline.

## Summary of actions to be completed by 31 March 2019

This clinical governance requirement, whilst not due by 31 March, should be completed shortly afterwards and as such it is best to begin work towards achieving this alongside the other requirements.

<b>COMPLAINTS REPORT</b>	To prepare an annual report each year and send a copy to the local NHS England team.	<b>As soon as practicable after 31 March 2019</b>
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TOPIC	REQUIREMENTS	BY WHEN
<b>Data Security and Protection (formerly IG) Toolkit</b>	To complete and submit an annual Data Security and Protection Toolkit.* *Note that PSNC has published <a href="#">new guidance to support submission of the new Toolkit.</a>	<b>31st March 2019</b>
<b>Community Pharmacy Patient Questionnaire (CPPQ)</b>	To conduct an annual CPPQ and publish the results.	<b>31st March 2019</b>
<b>Clinical Audit</b>	To conduct two audits each year: one on a topic of your choice* and one <a href="#">nationally determined</a> by NHS England. *Please note, the non-steroidal anti-inflammatory drug (NSAID) audit for the Quality Payments Scheme cannot be used as the pharmacy own audit.	<b>Pharmacy own audit deadline: 31 March 2019</b> <b>National audit deadline: Midnight was on 30 December 2018</b>

I will now describe how to comply with these requirements with links if necessary to the appropriate pages on PSNC website.

## DSP Toolkit

Providers of NHS services in England, including community pharmacies, must provide information governance assurances to the NHS on an annual basis. These assurances are provided through completion of an online assessment tool, the DSP Toolkit (previously IG Toolkit). The Toolkit questions were updated to incorporate the General Data Protection Regulation and the National Data Guardian's Ten Data Security Standards.

PSNC has developed a [briefing and guidance document](#) which may assist community pharmacy contractors to complete the new DSP Toolkit.

### FAQ

#### What about Brexit?

At present, the position remains unchanged – the GDPR will apply to the United Kingdom. It may be that any EU law not implemented as UK national law but which takes effect in the UK as a result of the UK's EU membership, such as the GDPR, may no longer apply post-Brexit depending on the terms of the negotiated agreement to leave the EU – the position is likely to become clearer as the UK approaches closer to formally leaving the EU.

### Webinar

PSNC and NHS Digital will be holding a 'Data Security and Protection (IG) Toolkit Workshop' on **Wednesday 30th January at 7.00pm**.

During the 60-minute webinar representatives from PSNC and NHS Digital will discuss the questions in the Toolkit, talk you through the guidance materials available and answer viewers' questions on how to make the declaration.

With contractors required to finalise their pharmacy's Data Security and Protection Toolkit submission by 31st March 2019, this webinar provides the perfect opportunity to make good headway in its completion.

To make the most of this session, we would advise taking a look at [PSNC's guidance documents](#) and [registering for the Toolkit](#) in advance of the webinar. Once registered for the webinar, you can also submit questions before the event. Registration now available <https://psnc.org.uk/our-events/data-security-and-protection-ig-toolkit-workshop/>

Alternatively, toolkit completion step by step can be found here: <https://psnc.org.uk/wp-content/uploads/2018/12/Completing-Data-Security-IG-Protection-Toolkit-PSNC-questions-guidance-PDF-ver.pdf>

Requests for support can also be made by email to [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) or telephone 0300 3034034. If you have queries on this PSNC Briefing, please contact either [william.goh@psnc.org.uk](mailto:william.goh@psnc.org.uk), Regulations Officer or [daniel.Ah-Thion@psnc.org.uk](mailto:daniel.Ah-Thion@psnc.org.uk), Community Pharmacy IT Lead.

### Here are some important points to note:

For contractors who have completed the Community Pharmacy GDPR Workbook, there is an initial question which if completed 'yes' automatically pre-populates almost half of the 70 mandatory questions.

PSNC have been liaising with the main PMR suppliers to ensure that they complete up to 12 technical questions on behalf of the contractor – the contractor will need to complete various initial profile questions on the toolkit. Once the contractor has put down the PMR supplier, the PMR supplier will add information to the Toolkit.

If a contractor has done the GDPR Workbook and the PMR supplier completes some of the 12 questions, there are at still at least 26 mandatory questions to complete and help with those is provided in the links above.

One of those questions relates to training – that 95% of employees must complete the training - NHS Digital has confirmed that if contractors have provided training using the shorter form of guidance on GDPR – Guidance Book 2 – this is sufficient. Contractors need to make sure that at least 95% of all staff have had such training – or the equivalent – to the appropriate level.

## CPPQ

All community pharmacies are required to conduct an annual community pharmacy patient questionnaire. The questionnaire allows patients to provide valuable feedback to community pharmacies on the services they provide.

Q. Do I need to have do anything with the CPPQ results?

A. Yes, the pharmacy must publish the results of the survey. The results must be published via one or more of the following options:

- a) in the pharmacy, as a leaflet or poster;
- b) on the pharmacy's website (if it has one);
- c) on the pharmacy's NHS website profile (NB one of the five gateway criteria...see page 7 of this newsletter)

Q. Do I need to send the results of CPPQ to NHS England?

A. No, there is no statutory requirement to send the survey report to the local NHS England Team.

For further information, please visit our webpage at: [psnc.org.uk/cppq](https://psnc.org.uk/cppq)\*

The NPA has published a toolkit to help its members to implement the CPPQ and a number of organisations offer packages of support that include provision of questionnaires and the collation of results. These include AAH and Webstar. Others are listed in the link above\*.

## Clinical audit

Community pharmacies must undertake a clinical audit each year, the topic of which they choose\*. In addition to this pharmacy-based audit, they must also complete an audit on a topic that has been determined by NHS England. (NB deadline for submission of the NHS England determined audit was 30/12/18).

Q. When do I need to have completed the pharmacy own audit?

A. Community pharmacies need to complete the audit chosen by them no later than 31 March 2019.

Q. Do I need to send the results of the pharmacy own audit to NHS England?

A. No, it is not a requirement in the terms of service to send the results of the pharmacy own audit to NHS England.

Q. Has NHS England determined the national audit?

A. Yes. the focus of the national audit for 2018/19 was the provision of advice to people with diabetes on the importance of them receiving a seasonal influenza vaccination. The data collection period for the national audit has ended and the deadline to submit data has now passed.

For more information, please visit the webpage at:  
[psnc.org.uk/audit](https://psnc.org.uk/audit)

\*Please note, the NSAID audit for the Quality Payments Scheme cannot be used as the pharmacy chosen audit.

There is additional useful information from RPS on conducting your clinical audit here: <https://www.rpharms.com/resources/ultimate-guides-and-hubs/clinical-audit-hub>

One suggestion in particular caught my eye: owings and out of stock items.

You could consider two stands for this audit:

- Pharmacy supply related issues
- Patient focussed medicines management issues

Use the link above to access some data collection forms to assist you in capturing information on your owings and out of stock items. These forms are downloadable in Word format and can be used as a whole, or you can adapt them for your particular needs. They are intended as suggestions for data collection and not all the data or standards may be relevant to your particular service. You may need to tweak. *If you are collecting and storing patient data you will need to ensure that you comply with data protection policies.*

The forms have been divided up so that you can print off those which best match the data you wish to collect.

## Complaints report

All pharmacy contractors must have in place arrangements which comply with the requirements of The Local Authority



Social Services and National Health Service Complaints (England) Regulations 2009 (the Regulations) for the handling and consideration of any complaints. As part of these arrangements, each contractor must prepare an annual report for each year ending 31 March.

Q. When do I need to have prepared my annual complaints report by?

A. Community pharmacies must prepare an annual report for each year ending 31 March

Q. I have not received any complaints. Do I need to prepare an annual report? A. Yes.

Q. Do I need to send a copy of the annual report to NHS England?

A. Yes, as soon as reasonably practicable after 31 March.

For more information, please visit our webpage at: [psnc.org.uk/complaints](https://psnc.org.uk/complaints)

Your report will:

- specify the number of complaints which the pharmacy contractor received;
- specify the number of complaints which the pharmacy contractor decided were well-founded;
- specify the number of complaints which the pharmacy contractor has been informed have been referred to the Health Service Commissioner to consider under the 1993 Act

Your report will indicate:

- the subject matter of complaints that the pharmacy contractor received;
- any matters of general importance arising out of those complaints, or the way in which the complaints were handled;
- any matters where action has been or is to be taken to improve services as a consequence of those complaints.

To assist pharmacies, PSNC has prepared a template summary of complaints, which can be used as an index of complaints as they are received and closed. All the information necessary to produce the annual report can then be collated from this summary at the end of each year.

[Summary of complaints \(MS Word\)](#)

[Summary of complaints \(PDF\)](#)



Guidance on all aspects of Clinical Governance can be found here <https://psnc.org.uk/contract-it/essential-service-clinical-governance/>

The clinical governance requirements of the community pharmacy contractual framework (CPCF) cover a range of quality related issues not just the ones highlighted in this newsletter. These must also be actioned or undertaken as part of the clinical governance requirements of the terms of service and NHS England may ask for evidence to check pharmacy contractors are meeting the requirements.

Additional guidance on the CPPQ gateway criterion which states that on the day of the review (15th February 2019), the results of the last completed CPPQ is publicly available on the pharmacy's NHS website profile (we previously called this NHS Choices) page or for distance selling pharmacies (DSPs), displayed on their website, can be viewed at <https://psnc.org.uk/our-news/quality-payments-cppq-gateway-criterion/>

If you need further help, particularly with points that require local details, please get in touch with the LPC through Anne-Marie [chiefofficer@pharmacynorthamptonshire.co.uk](mailto:chiefofficer@pharmacynorthamptonshire.co.uk) (Tel:07889412690) or if a general regulation query, please try: [william.goh@psnc.org.uk](mailto:william.goh@psnc.org.uk) , Regulations Officer

## Public Health Campaigns Deadline 31st January

This does not come under clinical governance but I thought it was worth including since the deadline is imminent.

The promotion of healthy lifestyles is an important and mandatory part of the Community Pharmacy Terms of Service for ALL pharmacies, including distance selling pharmacies. To be consistent with other Area Teams, in future NHS England will be running the campaigns over a calendar year (January to December).

Use a blank data collection form which you can annotate and use for each campaign (you participated in 4) for recording your interventions. Completed data collection forms for each of the campaigns should be retained at the pharmacy and a copy of the summary form should be completed for each of this year's campaigns and following completion should be submitted as one sheet at the end of the year –

**by the end of January 2019**, to NHS England Midlands & East (Central Midlands) by email to: [england.pharmacy-athsm@nhs.net](mailto:england.pharmacy-athsm@nhs.net).

### **IMPORTANT – please note the change in date for submissions.**

Without submission of the summary form there is no confirmation that a pharmacy has participated in the public health campaigns which form part of the essential services. Pharmacies are advised to also retain their own copies as evidence for contractual monitoring.

Thank you for your support and full and enthusiastic participation in this important and mandatory element of the pharmacy contract. The campaigns for this year can be found on LPC website. <https://psnc.org.uk/northamptonshire-and-milton-keynes-lpc/public-health-promotion-campaigns-2015-16/>  
Details of the recording and reporting will follow in due course from NHS England.

Please do make full use of the free training available from Virtual Outcomes: <https://www.virtualoutcomes.co.uk/pharmacy-training/>

Please contact Anne-Marie if you need a copy of the data collection or summary sheet for 2018

