The Data Security and Protection Toolkit (DSPT) â€" submission deadline 31 March 2019.

The Data Security and Protection Toolkit (DSPT) replaced the Information Governance toolkit from April 2018. The DSPT is an online self-assessment toolkit that has to be used by all organisations that have access to NHS patient data and clinical systems.

The submissions deadline is 31 March 2019, so it is best to prepare now as it can take up to three months for a practice to meet the mandatory elements of the DSPT.

What has changed

The DSPT has moved away from levels 1, 2, 3 and towards mandatory evidence items.

Duplication has been removed and the DSPT has more precise requirements.

It is aligned with the 10 data security standards and the General Data Protection Regulation (GDPR).

Practices must complete all of the mandatory items to be deemed ‘satisfactory’.

Practices must now demonstrate that 95% of all staff have received data security training and show understanding of who has access to practice systems as well as demonstrating an awareness of data flows within the practice. It is worth noting that if you have mapped your practice data and created a Record of Processing Activity (ROPA) for GDPR then you will already have met this requirement.

How to prepare

As it can take up to three months for a practice to prepare all of the information required to meet the mandatory assertions it is worth starting to prepare now.

First register your practice on the DSPT.

Then the best place to start is to look at the spreadsheet of assertions and which ones are mandatory for GPs and what evidence is required.

Then look at the e-training available to meet the 95% of all staff to have had security training.

You will need to provide details of your Data Protection Officer (DPO) in your submission, so if you have not yet appointed one or secured DPO services, you will need to do so. Your CCG is required to provide a DPO support service and training, ask them what this will include, if they have yet to provide you with details of this. You could also ask your federation if they have any plans to provide DPO support.

If you have not started mapping your practice’s data flows and/or created a ROPA for your practice, or you are not sure generally where to start with GDPR and DPA 18 compliance, then there is a useful practical resource produced by the NWL IG group with support from an IG consultancy. It takes two practices that are merging through GDPR and DPA 18 compliance, and there is a series of blogs and resources created from this exercise which are helpful in understanding GDPR compliance within a general practice setting, particularly in regard to data mapping and ROPAs. We have been given permission by the NLW IG group to share the link to this resource, but with the awareness that it is not legal advice.

For most practices, the submission to the DSPT will be their first test of GDPR compliance unless they have a CQC (Care Quality Commission) inspection before it. For CQC, all health and care organisations must assure themselves they are implementing the data security standards and meeting their statutory obligations on data protection and data security. This comes under the CQC’s key line of enquiry W6 which asks: “Is appropriate and accurate information being effectively processed, challenged and acted on?”. It is expected that submissions to the DSPT will help demonstrate how practices are assuring themselves in this area.