Registering for and completing the Data Security and Protection Toolkit for Social Care Providers

This guidance is applicable to CQC registered residential, nursing and home care services.

There are different ways to register your organisation on the Data Security and Protection Toolkit (https://www.dsptoolkit.nhs.uk/). This will depend on your organisation's structure.

There is guidance on how to complete your Toolkit submission here: https://www.digitalsocialcare.co.uk/protecting-my-information/data-security-and-protection-toolkit/.

Understanding ODS Codes

To register you will need to know your Organisation Data Service (ODS) code. All CQC registered adult social care providers will have ODS Codes. All Care Home and Domiciliary Care providers will have at least 2 codes.

- **An HQ code or "parent" code**. This is 4 digits and normally starts with an A or C, i.e. A*** or C***.
- **One or more site or "child" codes.** This is 5 digits and normally starts with V, i.e. V****. Each site code belongs to a single HQ code

Some organisations, particularly those that provide a wide range of services may also have additional ODS codes such as those for non-NHS organisations, e.g. 8***** etc. However, for the purposes of Care Home or Domiciliary Care provision such codes will not cover your sites on the Data Security and Protection Toolkit; see section 4 below for further explanation.

If you do not know your ODS codes you can look them up at https://odsportal.hscic.gov.uk/Organisation/Search or contact the NHS Digital helpdesk at exeter.helpdesk@nhs.net to request for them to be sent to you. There is more guidance on ODS codes available here: https://www.digitalsocialcare.co.uk/latest-guidance/how-to-find-your-ods-code/

There are different code hierarchies dependent on the size of your business. This is explained in more detail below.

1. Single Site Organisations (including Domiciliary Care operating out of one office location)
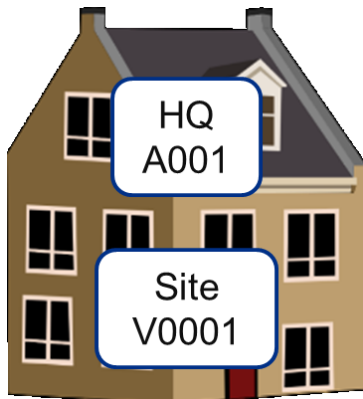
You will have both an HQ code and a site code. You can use either code to register for the Data Security and Protection Toolkit. Using the HQ code allows your business to expand/acquire new homes and add to them to the same Toolkit submission in the future.

(Note however that if you are subsequently applying for NHSmail via the National Administration Service (NAS) you must use your site code (V****) for that.

2. Multisite care home organisations which are one legal entity
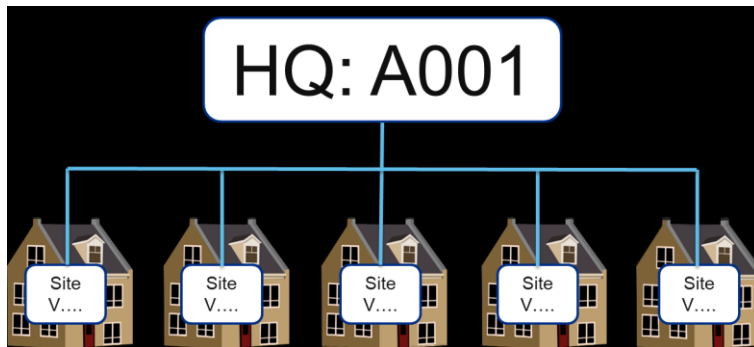
If you meet the following criteria, you can make one Data Security and Protection Toolkit submission to cover all sites in your organisation:-

- You are a single legal entity with multiple sites
- You have a single ICO (Information Commissioner's Office) registration number or can explain how your ICO registrations cover all of your sites.
- You believe that all your sites should have an identical Data Security and Protection Toolkit submission (i.e. the policies and procedures are exactly the same in all of your sites). Note that if you operate different types of service (e.g. both supported living and care homes) it is unlikely that your policies are identical and therefore this is not likely to be a good route for you.
- You have a single HQ ODS code (A*** or C***) and several site ODS codes (V****). (The functionality described here does not work for Domiciliary Care and other types of ODS Code, see section 4 below for details on what to do in that situation)

In this scenario the process is fairly straightforward; you should register for the Data Security and Protection Toolkit using the HQ code.

You should then contact the exeter.helpdesk@nhs.net and ask for HQ functionality to be turned on for you headquarters site.
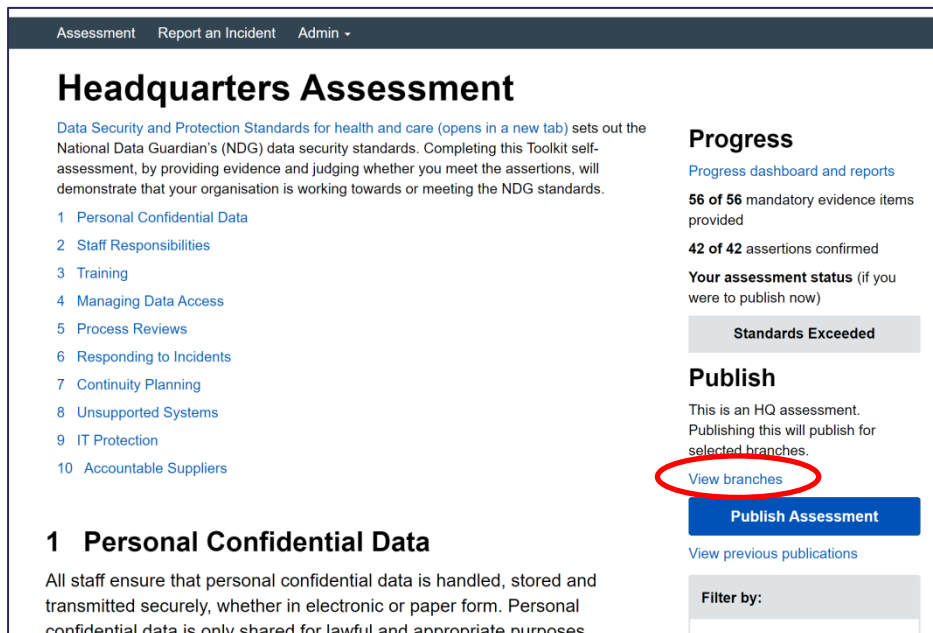
The HQ functionality can be turned on at any time while completing the Data Security and Protection Toolkit. This means that if you have already started your submission you can still ask for this change to made. You can also start completing your Toolkit submission while you wait for the Exeter Helpdesk to change your functionality.

When you log in, select your headquarters (it will say Headquarters in the top right of the organisation). This will take you into the assessment where you can record all the relevant evidence and, when complete, confirm the assertions.

When you have completed all necessary assertions, your Assessment page will look like this:

You can choose which of your sites/branches should be part of your assessment. Click on the view branches link to see which branches are related to your headquarters. You can export the list to a CSV if it is easier to view it in a spreadsheet.

The list should reflect your CQC registrations but if it list is incorrect, please [contact](#) the Data Security and Protection Toolkit team to provide details of missing/incorrect branches and request that the ODS record is updated.

It may be that you wish to publish for some of your sites straightaway, even if others are not ready, e.g. if relevant training has not yet been cascaded across the whole organisation. If the list contains branches that you don't wish to publish for (i.e. because they are either incorrect or not ready) you can choose to exclude them at the "*publish*" step. It is fine to add them in at a later date, and the system allows you to do this.

When you are ready to publish for your chosen sites, click the "*publish*" button on the assessment page.

3. Care Home Multisite organisations which are more than one legal entity

This route is for organisations which have two (or more) LTD businesses registered with Companies House, delivering care at multiple sites, BUT which act as a single business under a single trading name.

Because you have multiple legal entities you will have multiple HQ codes which will each have different site codes affiliated with them.

If you want to complete the Data Security and Protection Toolkit and cover all of your sites you have 2 options:

a) When all sites have the same processes and procedures (even with separate ICO registrations)

Choose one HQ code from your organisation, complete the Data Security and Protection Toolkit. In the section covering ICO registration it is perfectly acceptable to list more than one, if appropriate. You should ensure you cover all the details of your ICO registrations and which sites they cover in the format described below

ICO codes for the group are as follows:

Name_1 (ODS HQ code), Postcode, ICO registration no
Name_2 (ODS HQ code), Postcode, ICO registration no

Publish this toolkit. Then email exeter.helpdesk@nhs.net and ask for the publication to be copied onto your other sites. Please provide a list of the codes of the other sites to be copied to.

Once this is completed you can follow the directions described in section 2 above to publish for all the sites.

b) When sites have different processes and procedures
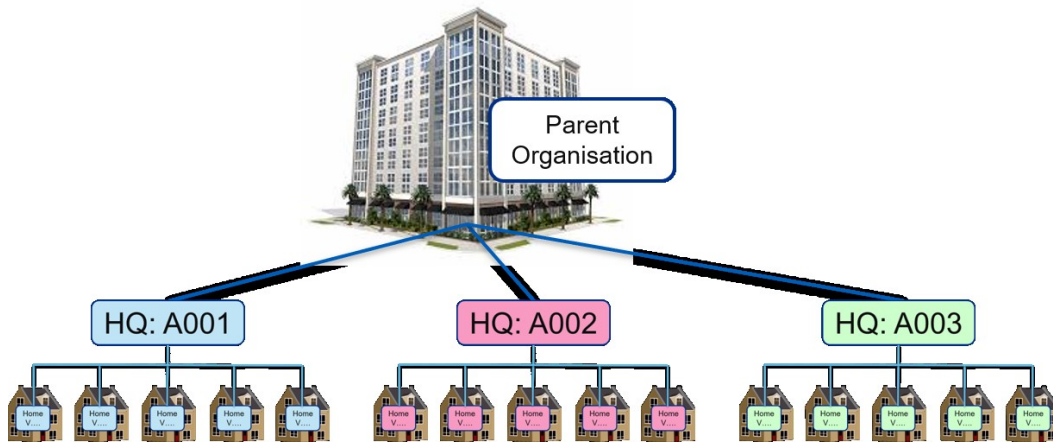
If your organisation consists of multiple legal entities which operate in substantively different ways, and do not have common processes or procedures, it is unlikely that a single Data Security and Protection Toolkit submission will be suitable. However, some responses may be common between organisations.

For the purposes of this document it is assumed that the sites under a particular HQ are covered by the same processes and procedures.

You should register each of your HQ codes (either A*** or C***). Ensure that for each one you have registered your email as an admin and completed the organisation profile for each one.

You will then see all of your organisations listed in the Organisation screen as below.

You then have two choices:

1. **Separate submission for each HQ**
Complete the Data Security and Protection Toolkit for each HQ code separately, by selecting each one in turn. Then publish on behalf of the sites as described in section 2.

2. **Provide evidence for multiple organisations in one go**
You could save time by choosing this option.

You can select multiple organisations and review their evidence responses and provide responses to questions in bulk. To do this you should click on "Provide evidence for multiple organisations in one go". You will still need to confirm assertions, provide responses to document questions and publish each assessment separately as usual.

You should consider which evidence can be shared with which associated HQ code (For example Anti-Virus details might not be common to all). Select the codes and for each evidence item you can record the correct evidence and it will be added to all the organisations you have selected.

The *"Provide evidence for multiple organisations in one go"* function enables individuals to respond to <u>text</u>, <u>date</u> and <u>checkbox</u> questions in bulk. Please note though that at the time of writing this document it is not possible to change responses to <u>document</u> evidence items in bulk; they are read only and can only be reviewed. Future expansion of this functionality is under consideration.

Once you have shared all the evidence you will need to go into each organisation, complete the bespoke evidence and publish for each site.

4. Domiciliary Care Organisations and Organisations that have non-social care ODS Codes

Domiciliary care organisations:

If you are a domiciliary care organisation and:

- You have a single ICO (Information Commissioner's Office) registration number or can explain how your ICO registrations cover all of your sites.
- You believe that all your sites should have an identical Data Security and Protection Toolkit submission (i.e. the policies and procedures are exactly the same in all of your sites.)

Then you should:

1. Publish a single toolkit for one of your sites to be the master publication
2. Email exeter.helpdesk@nhs.net and request your master publication (provide code) is applied to all of your sites. You will need to provide a site list with ODS Codes and postcodes as a minimum. You should include confirmation that this Data Security and Protection Toolkit will cover all the sites listed.
3. The Data Security and Protection Toolkit team will apply the publication to your sites and confirm.

Organisations with non-social care ODS codes:

Some organisations, particularly those that provide a wide range of services may also have additional ODS codes such as those for non-NHS organisations, e.g. 8***** etc. This situation is likely to arise for those organisations who have previously requested for codes to be created and have been set up with non-social care specific codes.

Whilst these codes are valid, for the purposes of Care Home or Domiciliary Care provision such codes will not cover your sites on the Data Security and Protection Toolkit.

It may be that you still need a Data Security and Protection Toolkit submission in respect of the separate services covered under such

codes. If that is the case you should publish against that code and then use the relevant option described in section 3 to extend coverage to the appropriate A***/C*** codes, followed by publishing on behalf of the sites as described in section 2.

If the site can be linked to an existing Data Security and Protection Toolkit submission under a A***/C*** code, you should publish your submission and contact the Data Security and Protection Toolkit team via exeter.helpdesk@nhs.net to have the submission linked to the relevant HQ code.