NIS Directive Team
Department for Digital, Culture, Media & Sport
4th Floor
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LONDON
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By email: niscallforviews@culture.gov.uk

Friday, 29 September 2017

Dear Sir or Madam

Consultation on Security of Network and Information Systems

The General Pharmaceutical Council (GPhC) is the regulator for pharmacists, pharmacy technicians and registered pharmacy premises in England, Scotland and Wales. Our role is to protect, promote and maintain the health, safety and wellbeing of members of the public by upholding standards and public trust in pharmacy.
Our main work includes:

- setting standards for the education and training of pharmacists, pharmacy technicians, and approving and accrediting their qualifications and training

- maintaining a register of pharmacists, pharmacy technicians and pharmacies

- setting the standards that pharmacy professionals have to meet throughout their careers

- investigating concerns that pharmacy professionals are not meeting our standards, and taking action to restrict their ability to practise when this is necessary to protect patients and the public

- setting standards for registered pharmacies which require them to provide a safe and effective service to patients

- inspecting registered pharmacies to check if they are meeting our standards

Whilst the Consultation on Security of Network and Information Systems as a whole is of interest to us we do not feel that we can meaningfully contribute to any of the questions posed.

However as the regulator for pharmacy professionals and registered pharmacies we have the following observations which you may find helpful.

It may be wise to consider further the "Health Sector" category in light of the increasingly complex arrangements that are required for the safe and effective delivery of healthcare. In particular, it appears as if essential service appears to omit the primary health care setting (which may of course be deliberate) and in particular the registered community pharmacy setting.

Some of the issues you may wish to consider when reviewing the breadth of the health sector category are:

- The public is increasingly using both on-line pharmacies and remote prescribing services to obtain their medicines.
- Also repeat dispensing services provided by community registered pharmacies rely on successful electronic prescription transfer.
- Such services are increasingly becoming centralised in large automated dispensing facilities relying heavily on information technology where the risks of network, information security breaches or operational failure can result in many thousands of patients not receiving their medicines on time and being adversely affected.
- There may also be a need to take into account issues of the supply chain, especially, pharmaceutical and medical device manufacturers and wholesale distributors of medicines and medical devices.
- There is also an interplay between regulators (both of the people working in healthcare and of the settings of healthcare) and the information they hold and exchange with healthcare delivery organisations.

For information, we have published guidance for registered pharmacies providing pharmacy services at a distance including on the internet in which we refer to aspects of the high level security principles set out in Annex 3 of the consultation document. Our guidance, which was first published in April 2015, is due for review. We therefore look forward to including a reference to the National Cyber Security Centre's generic cross-sector security guidance in the revision.

Yours faithfully

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