

## Policy on access to register data for research purposes

### 1. Introduction

- 1.1 The GPhC register holds details of the entire population of registered pharmacy professionals making it an ideal sampling frame for (quantitative) research purposes. We regularly receive requests from researchers, mostly based at universities, to access the register data, with many of these being requests for contact details of registrants.
- 1.2 The Pharmacy Order 2010 specifically prohibits the GPhC from publishing registrants' addresses as part of the register. As a data controller registered with the Information Commissioner's Office the GPhC must ensure that personal information is processed fairly and lawfully, in accordance with the principles of the Data Protection Act 1998 (DPA).
- 1.3 Our data protection statement states that we may share data with "third parties in pursuance of the GPhC's statutory aims, objectives, powers and responsibilities under the Pharmacy Order 2010, the rules made under the Order and other legislation." We include universities and research institutions in this statement.

### 2. Purpose

- 2.1 This policy sets out how we manage requests from researchers to access and use non-public domain data from the registers of pharmacy professionals, including how we make decisions and what criteria are used to assess requests.
- 2.2 Its purpose is to make sure that requests are dealt with fairly and in a way that protects registrants' personal data.

### 3. Policy statement

- 3.1 The GPhC will not give out registrants' contact details to researchers. Where a researcher wishes to carry out a survey of registrants, the GPhC may choose to help by sending emails with links to the survey to a sample of registrants on behalf of the researcher. Requests will be assessed on a case by case basis using the criteria set out in section 4 below.
- 3.2 Requests for other data from the register will be considered in line with our duties under the Freedom of Information Act 2000 and the DPA.

3.3 We may choose to recover costs for work we undertake for researchers and will confirm they are acceptable to the researcher before undertaking any activities for the project.

#### 4. Assessment criteria

4.1 The GPhC will assess how the proposed research project meets the following criteria in deciding whether the GPhC will support research by sending emails to registrants on behalf of the researcher.

- Researchers must demonstrate that a survey of registrants is the best means of obtaining the information. They must state what other methods of recruitment are available and show that these have been fully considered. They must choose a reasonable sample size; we would not contact all registrants. We must also be satisfied that information in the register allows adequate targeting in the sample.
- The proposed research project must support the GPhC's regulatory objectives and further understanding in at least one of the priority areas set out in the [strategic plan](#).
- It must align with and further understanding in at least one research priority area, particularly:
  - Understanding systems regulation and inspections;
  - The regulatory impact of new and emerging pharmacy business and service delivery models;
  - Patient centred professionalism in the pharmacy team; and
  - Pharmacy users and public expectations of pharmacy services.
- Research requests will be assessed on the extent to which they further understanding in one or more of GPhC's research priority areas.
- The research must meet the eligibility criteria:
  - Researchers must be based in a GB university or other charitable research organisation based in the GB;
  - Projects must be led by a senior researcher. Requests for PhD projects are only considered in exceptional circumstances, where the research question is particularly important to the GPhC and the PhD candidate works in a suitable educational and supervisory environment;
  - To be considered, research projects must have funding from a research funding organisation which undertakes peer review in making funding decisions; and

- Results from the research will be made public, for example published in a journal. Anonymised data from the research should also be deposited in a research data repository, such as the UK Data Archive.
- Researchers must provide a secure method to capture and process data and ensure that it is securely disposed of after the study.
- Any research meeting these criteria will be considered in the light of GPhC resources available at the time the survey is due to be carried out:
  - What resources are required?
  - What are the timescales for the research?
  - What is the impact on other GPhC activities?
- We will also consider the potential burden survey emails may place on registrants.

## **5. Evaluation, review and sign-off**

5.1 This policy will be reviewed annually or at other times as required, for example, if there are changes to GPhC research priorities.

5.2 Reviews will be carried out by the governance and regulatory development teams and signed off by the Director of Policy and Communications.

**Carole Gorman, Governance and Assurance Officer, Governance**

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