

## Policy on research and third party contact with registrants

### 1. Introduction

- 1.1 The GPhC register holds details of the entire population of registered pharmacy professionals. 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 We are also regularly approached by other organisations with an interest in contacting registrants, either asking for contact details or for the GPhC to contact registrants on their behalf.

### 2. Purpose

- 2.1 This policy sets out our policy on disclosure of registrants' contact details. It also sets out how we assess requests to contact pharmacy professionals on behalf of researchers and other third parties.
- 2.2 Its purpose is to make sure that requests are dealt with fairly and in a way that protects registrants' personal data and privacy.

### 3. Policy statement

- 3.1 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). The GPhC will not, therefore, give out lists of registrants' contact details to researchers or other third parties<sup>1</sup>.
- 3.2 Where a researcher or other third party wishes to contact registrants to carry out a survey or for other purposes, the GPhC may choose to help by sending emails on their behalf with links to the survey or other information. We would usually limit this to a sample of the register or a limited subset of the register. Requests will be assessed on a case by case basis using the criteria set out in section 4 below.
- 3.3 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.

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<sup>1</sup> We may occasionally share data with public sector organisations where there is a legal basis for sharing.

3.4 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 Academic research

- 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 [GPhC strategy](#).
- It must align with and further understanding in at least one research priority area, particularly:
  - Factors affecting the quality of pharmacy services, including the impact of new and emerging business and service delivery models;
  - Patient centred professionalism in the pharmacy team; and
  - The experiences of 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.

#### **4.2 Contact on behalf of other third parties**

- Article 6 of the Pharmacy Order 2010 sets out a duty for the GPhC to co-operate, as far as is appropriate and reasonably practicable, with other organisations involved in the regulation of health and care professionals and health services, or the provision, supervision or management of health services in the interests of the health, safety and well-being of members of the public. The GPhC will consider projects where there is a strong public interest in the success of the work or other regulatory benefit.
- The purpose and intended outcome of the contact must support the GPhC's regulatory objectives or at least one of the priority areas set out in the [GPhC strategy](#).
- Requesters must demonstrate that contact with registrants through the GPhC is the best means achieving their aims. They must show that other methods of contact have been fully considered.

#### **4.3 Operational and privacy impact**

- Any project meeting the criteria set out in sections 4.1 and 4.2 will be considered in the light of GPhC resources available at the time the work 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 emails may place on registrants.

### **5. Making a request**

- 5.1 Requests should be sent to the [FOI mailbox](#). We will assess the request against the criteria set out in sections 3.3 and 4 and respond within a maximum of 20 working days.

**6. Evaluation, review and sign-off**

- 6.1 This policy will be reviewed every three years or at other times as required, for example, if there are changes to GPhC research priorities.
- 6.2 Reviews will be carried out by the governance and data and insight teams and signed off by the director of strategy.

**Carole Gorman, governance and assurance manager, governance**

**Reference:** GP/2016/131

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**Review date:** 01 August 2019

**Agreed by:** Hugh Simpson, 21 July 2016