HDRUK
Health Data Research UK

UK Health Data Research Alliance

# Five Safe Data Access Request application form

## Background

The Data Access Request application form has been developed following a period of extensive consultation with the UK Health Data Research Alliance[1] data custodians and HDR UK[2] researchers. The form consolidates and categorises the common data access request questions using the Five Safe framework[3]. It offers a shared framework for data custodians to align their data access request applications and help streamline applications for users.

This form is the result of a harmonisation process, following analysis of many custodians' application forms (including all national Trusted Research Environments) and identification of a minimum common denominator across forms from all organisations. Streamlining data access across data custodian organisations and using a harmonised data access request form would it make it easier for both researchers and custodians to submit and respond to access request.

This form is currently used as part of the Innovation Gateway data access management system.

**Please note**:

All questions are in **BLUE** text.

Text in **GREEN** boxes can be modified by data custodians.

Data custodians can turn questions ON and OFF depending on their needs, as long as the Five Safe structured is maintained.

The questions relevant to public benefit have been included to align with the National Data Guardian's Putting into Practice[4] guidance.

This Data Access Request form is in continuous development. Questions below represent those included as of 28 January 2022.


## Acknowledgements

We would like to thank Alex Bailey, Garry Coleman, Alan Harbinson, Naomi Mill, Carole Morris, Chris Orton and Peter Stoke for their input into this work. As part of their work with the UK Health Data Research Alliance, all authors have contributed to the design of this streamlined, harmonised Data Access Request form based on the Five SAFE framework. The UK Health Data Research Alliance is working to maximise the implementation coverage of the harmonised data access request form across all of its member organisations. Progress varies based on existing systems and approaches and organisational approval mechanisms.


[1] Health Data Research Alliance https://ukhealthdata.org/
[2] Health Data Research UK https://www.hdruk.ac.uk/
[3] https://www2.uwe.ac.uk/faculties/bbs/Documents/1601.pdf
[4] https://www.gov.uk/government/publications/putting-good-into-practice-a-public-dialogue-on-making-public-benefit-assessments-when-using-health-and-care-data

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# About this application

Preparation is key to a successful data access request. You need to be able to demonstrate how you will ensure safe use of patient data and the potential for public benefit. The steps below are intended to help you get off to a good start.

## How to request access

Organisations and individuals wanting to use certain kinds of data, tissue samples or other sensitive resources need to show they meet strict data security and information governance standards by completing an application process and demonstrating that the use of data will deliver public benefit. We need to make sure we only provide access to sensitive patient level data to organisations that meet Information Governance (IG) requirements, and that this will be used to improve health and care services, generate public and societal benefit.

Before you begin this formal application process, please contact the data custodian to discuss your requirements using the 'Make an enquiry' messaging function. Not all enquiries need to progress to the formal application stage, for example it may be that your requirement can be satisfied through existing published data. Once your access request has been approved, de-identified data will be made available in a safe setting (for example a Trusted Research Environment). If you have requested access to tissue samples and other resources, you will be contacted by the resource custodians with access details.

**Submitting an application**

Once you're ready to make a formal application, complete the data access request form by clicking the 'Request Access' button.

Please read through the pre-application checklist in the 'About this application' page and confirm that you have read the guidance from the data custodian, which has been aligned with the <National Data Guardian Public Benefit guidance> where applicable.

The application form follows the Five Safes model (https://blog.ons.gov.uk/2017/01/27/the-five-safes-data-privacy-at-ons/). You will find application guidance embedded in the form. We require you to complete all relevant sections and to upload supporting information and signatures where applicable.

Important elements of an application that often require discussion with the data custodian include:

- the legal basis under which you access the data
- technical feasibility - whether what is being requested can be provided
- the purpose for wanting the data, including what public benefit will be yielded (e.g., for health and social care in the UK)

We recommend you work closely with our teams to capture the necessary detail in your application. The application will be referred back to you if more information is required. Please note that even after an application is submitted, the data custodian may still request additional information.

Information Governance

If you are requesting access to data through the Office for National Statistics Secure Research Service or access to administrative data within the scope of the Digital Economy Act (DEA) through other DEA accredited processors, you need to be a DEA accredited researcher. For more information visit https://www.ons.gov.uk/aboutus/whatwedo/statistics/requestingstatistics/approvedresearcherscheme.

Accreditation requires successful completion of the following course (or course of equivalent status).

- Safe Researcher Training course and online assessment – run by ONS, the UK Data Service or the Administrative Data Research UK partners.

If the researcher has previously undertaken and passed the Safe User of Research data Environments (SURE) training course, then this would also qualify.

The following training courses might also be accepted as evidence of appropriate Information Governance training where this is required before access to data is granted.

- MRC's Research, GDPR and confidentiality – what you really need to know

We will accept a certificate of completion for the accompanying quiz accessible here

- MRC Regulatory Support Centre: Research Data and Confidentiality e-learning (https://byglearning.com/mrcrsc-lms/course/index.php?categoryid=1)

If you have undertaken other Information Governance training that covers similar topics to the listed courses and wish this to be accepted as evidence, you will be asked to provide the course content with your application. Information governance training must be current. Training must be updated every 3 years (5 years for DEA accreditation) and if expiry of your training certificate occurs within the time period of your study, you will be required to renew your training.

**Access**

The Data Sharing Agreement will be electronically signed by the data custodian. The data, with patient objections (opt outs) upheld as appropriate, will be produced, reviewed and signed-off by the data custodian, or the data access service, if your request is successful. Data will made available through an appropriate safe setting.

**Costs of data access**

Most data custodians operate on a Cost recovery model, and payment will be required to cover the cost of administering and processing your request. Costs will be discussed during the pre-submission enquiry phase. The costs for National Core Studies projects will be covered separately.

**Useful resources**

Further information about the pre-submission process and information governance review for some data custodians can be found below:

Office for National Statistics
https://www.ons.gov.uk/aboutus/whatwedo/statistics/requestingstatistics/approvedresearcherscheme

SAIL Databank: https://saildatabank.com/application-process/two-stage-process/

Public Health Scotland: https://www.isdscotland.org/products-and-services/edris/use-of-the-national-safe-haven/

NHS Digital https://digital.nhs.uk/services/data-access-request-service-dars

Health and Social Care Northern Ireland http://www.hscbusiness.hscni.net/services/2454.htm

## Checklist

### 1. Select the datasets you need

The datasets you select may impact the questions being asked in this application form. You cannot change this later. If you're not sure, send a message to the data custodian to clarify. The custodian will help you understand if the data you would like to access can be used to answer your research question. Below you can add datasets that are listed in the Gateway.

Please note that you will be able to add datasets not currently listed in the Gateway under the 'Safe people' section of this form. If you need to request access to datasets from multiple data custodians please contact the custodians before completing the application form.

**Datasets**

### 2. Name your application

This can be your project name or anything that helps the custodian identify your application.

**Application title**

**This application is part of a National Core Studies project**

### 3. Invite contributors

Applications are often a team effort, so you can add others to help. Contributors can exchange private notes, make edits, message the data custodian, invite others and submit the application. If they're named in the application, you can fill in some of their details automatically. You can do this later too.

**Add contributors**

### 4. Read the advice from the data custodian

Please make sure you have read the advice provided by the data custodian on how to request access to their datasets.

**I have read how to request access**

### 5. Communicate with the data custodian

The earlier you get in touch, the better. If you've not done so yet, we recommend sending a message with a brief description of your project and the data you are interested in. The data custodian will help you understand the data and provide information on how to complete the data access application form.

**I have completed this step**

## 6. Check what approvals you might need

Before requesting access to health data, you might need to demonstrate that everyone involved in the project has appropriate information governance training and / or seek approvals for research projects (e.g., ethics). For example, to access administrative data from custodians such as the Office for National Statistics you need to be an accredited researcher under the Digital Economy Act.

Alternatively, you might be asked to demonstrate that you have or are planning to attend recognised Information Governance training.

Contact the data custodian to know more about recognised training and accreditation.

Becoming an approved researcher through the ONS approved researcher scheme

Information governance training recognised by some data custodians

**Data Security**

Data custodians require you to provide assurance that your organisation has appropriate data security processes in place. For example, use of NHS England data has to meet the standards set out in the Data Security Protection Toolkit. We encourage you to contact the data custodian for more information.

DSPT

The MRC Health Data Access toolkit aims to help you understand some of the approvals required for your research project. Data custodians request that these approvals are in place before you gain access to data. https://hda-toolkit.org/

Understand what happens after you submit the application

After you have completed the form, you can submit the application.

Make sure to double-check everything before submitting

You will NOT be able to edit your responses via the Gateway after submission (for now)

If you do need to make any amendments, get in touch with the data custodian

Both you and the data custodian will receive an email with a copy of the information submitted using this form.

**I have completed this step**

# Safe people

Who is going to be accessing the data?

Safe People should have the right motivations for accessing research data and understand the legal and ethical considerations when using data that may be sensitive or confidential. Safe People should also have sufficient skills, knowledge, and experience to work with the data effectively. Researchers may need to undergo specific training or accreditation before accessing certain data or research environments and demonstrate that they are part of a bona fide research organisation.

The purpose of this section is to ensure that:

- details of people who will be accessing the data and the people who are responsible for completing the application are identified
- any individual or organisation that intends to access the data requested is identified
- all identified individuals have the necessary accreditation and/or expertise to work with the data effectively.

This section should include key contact details for the person who is leading the project; key contact details for the person(s) who (are) leading the project from other organisations. Only one contact from each organisation is needed.

The 'Primary applicant' is the person filling out the application form and principal contact for the application. This is usually the person with operational responsibility for the proposal. Each application must have details for at least one person.

## Primary applicant

**Full name**

**Job title**

**Telephone**

**ORCID**

**Email**

**Will you access the data requested?**

**Are you an accredited researcher under the Digital Economy Act 2017?**

**If yes, please provide your accredited researcher number.**

**If no, please specify if you are planning to become an accredited researcher.**

**Have you undertaken professional training or education on the topic of Information Governance?**

**Please provide full details regarding the most recent training**

**Please provide any details of plans to attend training, if applicable**

**Does your organisation have a current Data Security and Protection Toolkit (DSPT) published assessment?**

**If yes, please provide the current status**

**If yes, please provide the date published**

**Will your organisation act as data controller?**

**ICO registration number**

**Registered address**

**Organisation type**

**I have uploaded a CV for this person**

## Other individuals

Please list other individuals who will have access to the resources being requested. Use the file upload function if you have more individuals to add than the form allows.

**Full name**

**Job title**

**Organisation**

**Role**

**Will this person access the data requested?**

**Is this person an accredited researcher under the Digital Economy Act 2017?**

**If yes, please provide details**

**Has this person undertaken professional training or education on the topic of Information Governance?**

**Please provide full details regarding the most recent training**

**Please provide any details of plans to attend training, if applicable**

**I have uploaded a CV for this person**

**Please provide evidence of this person's expertise and experience relevant to delivering the project**

# Safe project

What is the purpose of accessing the data?

Safe projects are those that have a valid research purpose with a defined public benefit. For access to data to be granted the researchers need to demonstrate that their proposal is an appropriate and ethical use of the data, and that it is intended to deliver clear public benefits. The purpose of this section is to ensure that:

- the project rationale is explained in lay terms
- the research purpose has a defined public benefit. This can be new knowledge, new treatments, improved pathways of care, new techniques of training staff.
- how the data requested will be used to achieve the project objectives is articulated.

## About this application

**This application is...**

- **A new application**
- **An amendment to an existing application**
- **An extension of an existing approval**
- **A renewal of an existing approval**
- **Related to a previous application (approved or not)**

**Reference or details of previous application**

## Project details

**Title of project***

**What is the type of project?***

- **Research**
- **Clinic audit**
- **Service evaluation**
- **Other**

    **If other, please specify**

**Is this a new study or supporting an existing study?**

- **New study**
- **Existing study**

    **I have enclosed evidence of existing outputs**

**Has the hypothesis being investigated been commissioned by the NHS?**

If yes, please provide details of the commission and any peer review to date. (100 words)

Please provide a lay summary of the project (300 words)*

What is the anticipated start date of the project?

Please provide anticipated end date of the project?

What are the project aims, objectives and rationale?*

How will the data requested be used to achieve the project objectives?*

How will your project benefit the public and what is the anticipated impact?*

Can you provide an outline of the public and patient involvement and engagement (PPIE*) strategies of the study or a brief explanation of why they are not planned?

## Funder information

A funder is the organisation or body providing the financial resource to make the project possible, and may be different to the organisation detailed in the Safe people section. Please provide details of the main funder organisations supporting this project.

Please use the file upload function if you're not able to add all funders via the form.

Does your project have a funder?*

If yes, please provide the organisation name

If no, please provide details of how you intend to fund the study

Please provide evidence of independent peer review

I confirm I have provided evidence of independent peer review

## Sponsor information

The sponsor is usually, but does not have to be, the applicant's substantive employer. The sponsor takes primary responsibility for ensuring that the design of the project meets appropriate standards and that arrangements are in place to ensure appropriate conduct and reporting.

Please use the file upload function if you're not able to add all sponsors via the form.

Does your project have a sponsor?*

If yes,

Organisation name

Registered address

Sector

Size

Additional details

**Contact email address**

## Declaration of interest

All interests that might unduly influence an individual's judgement and objectivity in the use of the data being requested are of relevance, particularly if it involves payment or financial inducement.

These might include any involvement of commercial organisations at arm's-length to the project, or likely impact on commercial organisations, individually or collectively, that might result from the outcomes or methodology of the project.

All individuals named in this application who have an interest this application must declare their interest.

**Commercial interest**

**Is there a commercial interest in this project?***

**If yes,**

**Organisation name**

**Registered address**

**Describe the nature of interest**

**I confirm that any commercial interest is public interest related.**

**Intellectual property**

**Please indicate if the research could lead to the development of a new product/process or the generation of intellectual property.**

# Safe data

Safe data ensure that researchers have a clear legal basis for accessing the data and do not inadvertently learn something about the data subjects during the course of their analysis, minimising the risks of re-identification.

The minimisation of this risk could be achieved by removing direct identifiers, aggregating values, banding variables, or other statistical techniques that may make re-identification more difficult. Sensitive or confidential data could not be considered to be completely safe because of the residual risk to a data subject's confidentiality. Hence other limitations on access will need to be applied.

The purpose of this section is to ensure that:

- there is a clear legal basis for accessing the requested data
- the data requested is proportionate to the requirement of the project
- all data requested is necessary in order to achieve the public benefit declared
- data subjects cannot be identified by your team by cross-referencing datasets from anywhere else.

These are the Information assets which your project seeks to access and use. You should consider this definition to be wide in scope and include any source of information which you propose to access and use. The data may be highly structured or less structured in nature, already existing or to be newly collected or gathered.

Examples may include national datasets, local data sets, national or local extracts from systems, national or local registries or networks, patient records, or new information to be gathered from patients, families or other cohorts. It could also include metadata which may need to be accessed when physical samples are being requested.

"New data" should only include data that is being specifically gathered for the first time for the purposes of this project. i.e., data already held in case notes and transferred to a form is not "new" data, but a survey filled out by clinicians in order to gather information not recorded anywhere else is "new".

## Data fields

**Please indicate the data necessary to conduct the study, the data fields required and the justifications for each field.**

**Data fields indicated via file upload**

> **I confirm that I have enclosed a list of datasets, fields and variables required for the study as well as justification for each field.**

**Inclusion and exclusion criteria (including date parameters)***

**Will you require periodic refreshes of the data?***

> **If Yes: How often will the data refreshes be needed?**

**Geographical coverage of datasets requested**

**Are you requesting data that contains individual identifiers?**

**Do you require aggregated or record level data?**

**Analysis**

**Do you wish to commission the data custodian to conduct the analysis for you, minimising your exposure to the data?**

**Samples required**

**Do you wish to request access to any additional resources (samples or tissues)?**

**If you are requesting additional resources, please specify your requirements**

## Other datasets - Intention to link data

This section should include information on the planned use of datasets not already included in this application. The following information is required:

- A descriptive name so that it is clear what the dataset is.
- Sufficient information to explain the content of the dataset.
- Whether the proposal requires linkage of data, the use of matched controls, or the extraction of anonymised data.

Please indicate which organisation or body is undertaking these processes and which variables from the data sources requested will be used to achieve the proposed linkage. This should cover every dataset and variable you will require.

**Do you intend for the datasets requested to be linked with any additional datasets, other than the datasets listed in this application?***

**If yes,**

**specify all datasets, organisations which will perform the linkage and how the linkage will take place.**

**Please summarise the risks/mitigations considered.**

## Lawful basis

General Data Protection Regulation (GDPR) applies to 'controllers' and 'processors'.

A controller determines the purposes and means of processing personal data.

A processor is responsible for processing personal data on behalf of a controller.

GDPR applies to processing carried out by organisations operating within the EU. It also applies to organisations outside the EU that offer goods or services to individuals in the EU.

GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household activities.

GDPR only applies to information which relates to an identifiable living individual. Information relating to a deceased person does not constitute personal data and therefore is not subject to the GDPR.

**Article 6 lawful basis***

- **Not applicable**

  a) **the data subject has given consent to the processing of his or her personal data for one or more specific purposes;**

  b) **processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;**

  c) **processing is necessary for compliance with a legal obligation to which the controller is subject;**

  d) **processing is necessary in order to protect the vital interests of the data subject or of another natural person;**

  e) **processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;**

  f) **processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.**

**Article 6 legal basis justification***

**Article 9 conditions***

- **Not applicable**

  a) **the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;**

  b) **processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;**

  c) **processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;**

  d) **processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to**

former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

e) processing relates to personal data which are manifestly made public by the data subject;

f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

**Article 9 legal basis justification***

## Confidentiality avenue

If confidential information is being disclosed, the organisations holding this data (both the organisation disclosing the information and the recipient organisation) must also have a lawful basis to hold and use this information, and if applicable, have a condition to hold and use special categories of confidential information, and be fair and transparent about how they hold and use this data.

In England and Wales, if you are using section 251 of the NHS Act 2006 (s251) as a legal basis for identifiable data, you will need to ensure that you have the latest approval letter and application.

For Scotland this application will be reviewed by the Public Benefit and Privacy Panel.

In Northern Ireland it will be considered by the Privacy Advisory Committee. If you are using patient consent as the legal basis, you will need to provide all relevant consent forms and information leaflets.

**Please provide the legal basis to process confidential information**

- **Not applicable**
- **Informed consent**
- **Section 251 support**
- **Other**

**If other, please specify**

**Informed consent evidence**

**I have enclosed a blank copy of the patient consent form(s) and all related information sheets relevant to the time period in the data requested**

**Section 251 exemption evidence**

**I have enclosed a copy of the S251 approved amendments and any renewal letters**

**CAG reference**

**The section 251 approval enables the applicant to**

- **Hold/receive personal data**
- **Transfer/access personal data**
- **Operate on and link personal data**
- **Other, please specify**

## Ethics approval

This section details the research and ethical approval which you have obtained or sought for your project, or otherwise provides evidence as to why such approval is not necessary.

Where such approval is not in place, it is important that you demonstrate why this is the case and provide assurances if approval is pending. If you need advice on whether ethics approval is necessary, you should approach your local ethics services in the first instance. Information about UK research ethics committees and ethical opinions can be found on the Health Research Authority (HRA) website.

**Do you seek for your project to be approved under the generic favourable ethical opinion of the INSIGHT Research Database (Ref: 20/WS/0087)?**

**Has ethics approval been obtained?***

- **If not required, please provide details**
- **If approval is pending, please provide more details**
- **If not, please provide more details**
- **Approval - REC committee name**
- **Approval - REC reference number**

- **Approval - Other committee**

**Evidence of REC approval**

**I have enclosed a copy of the final REC approval letter and letters documenting any REC approved amendments**

# Safe settings

Safe settings are analytics environments where researchers can access and analyse the requested datasets in a safe and ethical way. Safe settings encompass the physical environment and procedural arrangements such as the supervision and auditing regimes. For safe settings, the likelihood of both deliberate and accidental disclosure needs to be explicitly considered.

The purpose of this section is to ensure that:

- researchers access requested data in a secure and controlled setting such as a Trusted Research Environment (TRE) that limits the unauthorised use of the data
- practical controls and appropriate restrictions are in place if researchers access data though non-TRE environment. There may be requirements that data is held on restricted access servers, encrypted and only decrypted at the point of use.

## Storage and processing

This section details in what way the proposal aims to store and use data, and controls in place to minimise risks associated with this storage and use. If you have indicated that your proposal seeks to store and use data exclusively through a recognised trusted research environment, then you do not need to complete this section.

In relation to personal data, means any operation or set of operations which is performed on personal data or on sets of personal data (whether or not by automated means, such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction).

All Locations where processing will be undertaken, for the avoidance of doubt storage is considered processing. For each separate organisation processing data which is not fully anonymous a separate partner organisation form must also be completed.

Processing, in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including—

a. organisation, adaptation or alteration of the information or data,
b. retrieval, consultation or use of the information or data,
c. disclosure of the information or data by transmission, dissemination or otherwise making available, or
d. alignment, combination, blocking, erasure or destruction of the information or data.

Please use the file upload function if you're not able to add all organisations via the form.

**How will the data be accessed?**

- **Via a Trusted Research Environment**
- **Via transfer to a physical location**

**If via a Trusted Research Environment**

**In which Trusted Research Environment will the data be accessed?**

- **Secure e-Research Platform (SeRP)**
- **NI Honest Broker Service (NI HBS)**
- **Scottish National Safe Haven (SNSH)**
- **NHS Digital**
- **SAIL Databank**
- **ONS Secure Research Service (SRS)**
- **Other**
  - **If other, please specify**

**If via transfer to a physical location**

**Registered name of organisation**

**Registered number**

**Will this organisation be storing or processing the data?**

**What type of security assurance does this organisation have in place?**

- **Data security and Protection Toolkit (DSP Toolkit)**
  - **DSP Toolkit organisation code**
  - **DSP Toolkit score**
  - **DSP Toolkit version completed**
- **ISO 27001**
  - **Evidence of ISO 27001 - I have enclosed a copy of my certificate**
- **SLSP**
  - **Evidence of SLSP - I have enclosed a completed system level security policy for ODR review**
- **Other**
  - **please specify**

## Dataflow

Jurisdiction (coverage) is defined as the location of the healthcare services who originated / initially provided the extract of data you are requesting.

A description of the following must be provided:

- All locations where data is processed
- All transfers that take place between locations and organisations
- Data linkages to other data sets.

**Will the data be transferred outside of the United Kingdom?***

**If yes, please provide more details**

**Please specify the regions where data will be processed.**

- **England/Wales**
- **United Kingdom**
- **European Economic Area**
- **Other**

**Please provide detailed information on data flows**

**Please include a data flow diagram for the requested data and any additional datasets intended to be linked.**

# Safe outputs

Safe outputs ensure that all research outputs cannot be used to identify data subjects. They typically include 'descriptive statistics' that have been sufficiently aggregated such that identification is near enough impossible, and modelled outputs which are inherently non-confidential. The purpose of this section is to ensure that:

- controls are in place to minimise risks associated with planned outputs and publications
- the researchers aim to openly publish their results to enable use, scrutiny and further research.

## Outputs dissemination plans

Please include any plans for dissemination and publication of the data and results arising from your proposal. Please also specify any controls in place to minimise risks associated with publication. Dissemination can take place in a variety of ways and through many mechanisms, including through electronic media, print media or word of mouth.

**How will proposal findings be disseminated, to what audience and in what format?**

**Please include any milestones for outputs dissemination.**

**What steps will be taken to ensure that individuals cannot be identified? Please describe what disclosure control policy will be applied.**

**Could the outputs of the use of this data be manipulated to serve purposes that are not in the public interest?**

## Data retention

This section details how the project will treat data being processed after it has been used for the purpose of the proposal outlined, including governance in place to determine how long it will be retained, and controls to manage its subsequent disposal if required. Please reference any relevant policies and procedures which are in place to govern retention and disposal of data as outlined in the proposal.

**Please state the date until which you will retain the data***

**Please indicate the reason for this date**

**Please provide details of any permissions that will need to apply for an extension to during this period in order to retain a legal basis to hold the data (e.g., section 251)**

**Please confirm you will only use the data provided for the purpose specified in the Data Sharing Agreement**

**What method of destruction will be used when this period has expired?**

**What evidence will be provided that destruction has occurred and when?**