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Title	**GCRF Data Transfer**		

The purpose of this guidance is to define the practices of data transfer between Glasgow Clinical Research Facility (GCRF) and external organisations including NHS Health Boards, Trusts, universities and other institutions in accordance with NHS Greater Glasgow & Clyde (GG&C) Information Governance Policies, Data Protection Act 2018 and NHS Scotland Confidentiality Code.

To protect the identity of any individual participating in research, extra precautions should be followed before transferring and publishing information.

For each type of data transfer, practices must be followed to ensure:

- The security of data.
- Maintenance of participant's confidentiality.
- Successful transfer and receipt of data.

1. Types of Data

a. Identifiable Data

Publicly identifiable data are identifiers that can be linked to an individual if found by a member of the public.
Identifiable data consists of:

- Name
- Date of birth (DOB)
- Postal address, telephone number and email address
- Postcode
- CHI number

b. Pseudo-anonymised Data

Pseudo-anonymised data is prepared from elements of personal information in a combination that cannot identify an individual by anyone other than site staff. In clinical research this process is commonly used to pseudo-anonymise documents. The removal of as many identifiers as possible must ensure the utility of the data is not compromised.
Commonly used pseudo-anonymised data are:

- Research participant number
- A combination of initials, participant number and DOB

With pseudo-anonymised and unlinked anonymised data there are occasions where is it possible to identify an individual through combinations of information.
Other potential identifiers include:

- Rare disease or treatment especially if an easily noticed illness/disability is involved.
- Partial postcode or address.
- Place of treatment or health professional responsible for care.
- Rare occupation or place of work.
- Combinations of birth date, ethnicity and date of death.

c. Non-personal data

Non-personal data is not directly related to an individual but the data itself may be sensitive to the research study, including:

- Recruitment figures
- Safety and efficacy data
- Case Report Forms
- Raw statistical datasets.

2. Transfer of Data to Sponsors/Third Party Vendors

The transfer of personal data is covered by the Data Protection Act 2018. Before the transfer of personal identifiable or pseudo-anonymised data, the appropriate consent must be obtained and details of the transfer must be stipulated in the documents approved by the Research Ethics Committee.

Pseudo-anonymised study related documents, Case Reports Forms and Serious Adverse Event reports, can be sent to the central study data centre/coordinating centre by secure method; email (NHS to NHS, or NHS encrypted method). The method for all study related documents containing personal identifiable data should only be sent through email (NHS to NHS, or NHS encrypted method following NHS GG&C Information Governance policy).

3. Transfer of Data from General Practice to GCRF

GPs may identify potential recruits for studies supported by GCRF and invitation letters will be sent by GCRF staff. Transfer of data from practice to GCRF must be completed using NHS to NHS email.

4. Receiving Data

Any data received by GCRF should be acknowledged on receipt by email.

5. Data Breaches

NHS GG&C Data Breach Policy will be followed, and advice sought from the Data Protection Officer. Research Nurse Manager and Quality Assurance Lead must be notified immediately of any data breaches.

Guideline signatories

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Document history

Version	Date	Description
1.0	11/12/2017	Creation of Guidance document
2.0	03/08/2023	Update to GCTU Guidance template v1.0 Update of DPA from 1998 to 2018

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