

SOP number	59.014	Version	1.0
Title	Disclosure Control of Outputs From The TRE		

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SOP category	West of Scotland Safe Haven			
Staff category				
Staff Category	R	A	C	I
West of Scotland Safe Haven Manager		X		
West of Scotland Data Managers	X			
West of Scotland Senior Information Analyst	X			
West of Scotland Data Analyst	X			
West of Scotland Safe Haven Project Manager				X
Robertson Centre for Biostatistics Senior Application Programmer			X	

1. Scope

This procedure applies to the Safe Haven within NHS Greater Glasgow and Clyde.

2. Purpose

To describe the disclosure control process relating to data outputs from the Secure Analytics Platform to ensure these outputs meet legal standards and minimise risk of re-identification for the protection of personal information.

3. Procedures

3.1 General

Researchers working on a project specific workspace within the Trusted Research Environment (TRE) at the Robertson Centre for Biostatistics can request results, charts, figures and scripts for release from their secure environment. These files are referred to here as 'outputs'.

Once an output is released to the research team, it is no longer under the supervision of NHS Greater Glasgow and Clyde, and hence there is a risk of a personal data breach, or breach of the legal agreements in place for the processing of said output.

This document describes the NHSGGC Safe Haven disclosure control process to ensure that outputs released from the TRE meet legal standards for protecting personal information and mitigate against disclosure risks as much as possible.

3.1. Output Checking Process

Standard output requests will follow the steps below:

- Researchers request output as per RCB Output process guidance.
- The Robertson Centre for Biostatistics will notify the Safe Haven via email to inform that an output is available for checking.
- Any member of the Safe Haven team with appropriate training (ONS Safe Haven researcher training or other Safe Haven manager approved training) can process the output request.
- A member of staff (output checker) will access the requested output file(s) via <https://rcbft.com/> (secure RCB transfer platform). The relevant output files are saved onto NHSGGC systems. All downloaded files will be documented as per process outlined in WI 59.014A.
- To support assessment of the output, researchers are asked to complete Form 59.014A in their workspace and request this along with the output files. The form asks for the following information.
 - File name / type
 - Output description
 - Output purpose (internal review, publication, code output) – see 2 below
 - Additional details, if appropriate (update to a previous version, SDC methods applied,...)

If the details above are not included with the outputs, the output checker will get in touch with the researcher via email to query any missing details.

- One, or preferably two output checkers will assess each request against the NHSNHSGGC Safe Haven Output Standards – see section 3.3. Where an output is deemed to be more complex these outputs must be checked by 2 members of the team. If the output checker(s) have any concerns about the content of the output, they will discuss their findings and will make a joint decision if the output can be released or not. If the output checkers cannot agree, the request will be escalated to the West of Scotland Safe Haven Manager.
- If the output meets the NHSGGC Safe Haven output standards, the files will be made available to the researcher via email or other secure transfer system (e.g. SWAN, UoG data transfer system, or other as agreed).
- If the output does not meet the NHSGGC Safe Haven output standards, the researcher will be informed and an explanation provided, why the output did not pass the checks. If appropriate, the output checker will provide suggestions on how to make the output safer. In some circumstances it may be beneficial for the output checker to meet (virtually or in person as agreed) to discuss the content of the output and agree on the appropriate actions.
- Any correspondence regarding the output checks and the final decision will be documented and saved as part of the project documentation.

3.2. Clearance Types

Output can be released under 3 different clearance types.

- **Internal Review:** The files may only be shared with Researchers, Sponsors and/or Funders who are named on the project; the files must be deleted once the project ends or when a new version of the output is being requested.
- **Publication Clearance:** The files may be shared beyond individuals named on the project; the files may be retained indefinitely.
- **Code Clearance:** only suitable for code files that do not contain any clinical data. The files may be shared beyond individuals named on the project.

When NHSGGC Safe Haven releases output to a researcher, the correspondence will include the disclaimer above, depending on the type of clearance. The researcher will also be instructed to add the disclaimer text to their outputs. An email template for this can be found in Form 59.014A.

3.3. NHSGGC Safe Haven Output Standards

Outputs will be assessed based on the standard categories below. Some projects might have different/additional project-specific output requirements in place. If this is the case, these will be filed in the NHSGGC Safe Haven project folders and will be used as the assessment guidelines for the project.

- **Threshold**
As a rule of thumb, counts under 5 will not be released.
- **Type of output**
Full tables and individual-level data such as demographic details, names, patient identifiers, postcode, date of birth, date of death will not be released.
- **Safe/Unsafe Statistics**
Outputs will be assessed against guidance in the Handbook of statistical disclosure control https://ukdataservice.ac.uk/app/uploads/thf_datareport_aw_web.pdf.
- **Re-Identification Risk**
Any research outputs that carry an unacceptable risk of re-identification will be rejected for release. Examples include where there is a noteworthy outlier in any given table or graph.
- **Outputs Correspond With Approved Research Purpose**
Ethical approval for the use of unconsented NHS patient data is given for a specific research purpose. Safe Haven staff will assess data outputs to ensure these do correspond to the approved research purpose in the LPAC approval or other appropriate approval documents. Any data outputs that do not match the ethically approved research purpose will be rejected for release, a communication querying the substance of the data output will be sent to the Researcher, and the matter will be escalated to the Safe Haven Manager or, in their absence, to the Safe Haven Project Manager.

- **Check The Legal And Ethical Status Of Outputs**

Some Safe Haven projects are restricted by legal agreements in place that may limit the type of outputs that can be released. Parties are not permitted to output programmatic code, data or results from the platform with a patent commercial value if the terms of their usage of the Safe Haven data and secure environment expressly forbids this, or permits this only under particular circumstances.

Safe Haven staff will check research outputs to ensure they are not in breach of these Safe Haven data and secure environment usage agreements. Any data outputs that conflict with the legal agreements for usage will be rejected for release, a communication querying the substance of the data output will be sent to the Researcher, and the matter will be escalated to the Safe Haven Manager or, in their absence, to the Safe Haven Project Manager.

- **Coding Files (syntax)**

Code for release cannot include counts, references to patient IDs or patient data. Safe Haven file paths also need to be removed before the files can be approved for release.

- **Exceptions**

Depending on the project and the type of output, exceptions to the points above can be made. Any exceptions must be approved by the Safe Haven Manager and the decision must be documented.

4. Referenced documents

- RCB Output process guidance
- Form 59.014A - WoS Safe Haven Output Request Spreadsheet
- WI 59.014A - Safe Haven Disclosure Control process
- [Handbook on Statistical Disclosure Control for Outputs - https://ukdataservice.ac.uk/app/uploads/thf_datareport_aw_web.pdf](https://ukdataservice.ac.uk/app/uploads/thf_datareport_aw_web.pdf)

5. Related documents

- NA

6. Document history

Version	Date	Description
1.0	01/09/2025	First version

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