



GUMCAD DATA SHARING POLICY:

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Revision date	Version	Summary of Changes
31 st October 2008	2	Greater detail on use and sharing of data extracts and more background information on how data are used.
4 th November 2008	3	Minor editorial changes.
9 th December 2008	4	Minor editorial changes.
10 th December	5	Addition of further information on levels of breach and reporting protocols. Also consideration given to publication of anonymised PCT level data on a case by case basis. Minor editorial changes.
12 th March 2009	6	Change in policy on small cell sizes at SHA and national level in accordance with small cell sizes consultation document.
21 st July 2009	6.1	Minor editorial changes.

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1. Background to policy

- 1.1. The Genitourinary Medicine Clinic Activity Dataset (GUMCAD) is used to monitor trends in new diagnoses of sexually transmitted infections (STI) and other sexual health problems and to determine which specific groups are at particular risk. This information is used to inform the public health response by:
- Improving the planning and management of services.
 - Developing, adapting and refining interventions.
 - Monitoring the effectiveness of sexual health policies.
- 1.2. GUMCAD extracts are submitted to the Health Protection Agency (HPA) Centre for Infections for processing and analysis. The GUMCAD return includes patient demographic details collected at patient registration at their first attendance at a GUM clinic, and clinical and risk factor data collected during the patient consultation. The data are pseudonymised i.e. they contain the patient's clinic (hospital) number but they do not contain patient-identifiable information such as name, date of birth, postcode etc. However they are sensitive patient-level data and their storage and access to them requires strict control. Currently only HPA has approval from the Patient Information Advisory Group (PIAG) to handle patient-level GUMCAD data.
- 1.3. In addition, following the recent ONS guidance on data disclosure, the Small Cell Sizes subgroup of the HPA Caldicott Group have produced general guidance for the publication of HPA data for consultation¹. As a result, HPA rules on the publication or release of aggregated STI data including GUMCAD (on the website or otherwise) were changed.
- 1.4. The GUMCAD Steering Group and the Small Cell Sizes subgroup of the HPA Caldicott Group have agreed the following policy with respect to storing, access, sharing and use of patient level and aggregated GUMCAD data which is in line with Caldicott principles, ONS guidance and the HPA Caldicott Group consultation paper. This policy will be reviewed annually and updated as required.

2. Levels of access to GUMCAD data

- 2.1. GUMCAD data can be accessed at different levels according to purpose. The different levels of access are outlined below.
- 2.1.1. **High-level aggregated data.** These data are presented in tables, graphs or maps which summarise trends and diagnosis rates by various patient characteristics at the national, regional or Strategic Health Authority (SHA) level. These data are usually made available publicly on the HPA website.

¹ Health Protection Agency. Internal consultation on policy on sharing and dissemination of datasets with small cell sizes. January 2009.

- 2.1.2. **Local-level aggregated data.** These data are presented in tables, graphs or maps which summarise trends and diagnosis rates by various patient characteristics at the Primary Care Trust (PCT), Local Authority (LA), Lower Super Output Area Level (LSOA) and GUM clinic level. These data are distributed, in confidence, to a range of stakeholders within the NHS, Department of Health and HPA for the purposes of planning and managing services, developing interventions and monitoring the effectiveness of health policies. These data may sometimes be made available publicly on the HPA website, although restrictions apply (see section 3.3.2-3.3.3).
 - 2.1.3. **Patient-level data extracts** containing data on individual patient episodes. Data extracts are not updated and are generally used by epidemiologists, data analysts and statisticians for epidemiological or statistical analyses.
 - 2.1.4. **'Current' patient-level data** held in the GUMCAD database or on the mirror server. These data are regularly updated and may be accessed by the HPA database administrator for data management, information officers and epidemiologists for running queries and producing data extracts for analysis, and by software engineers developing standard reports which run from the database.
- 2.2. The agreed policy for accessing GUMCAD data at these different levels is detailed in the following guidelines.

3. Data sharing guidelines

3.1. Principles for storing and accessing 'current' patient-level data

- 3.1.1. GUMCAD data will be directly uploaded to the HPA by GUM clinic staff via the HPA MESH (Microbiology and Epidemiology of STIs and HIV) web portal and stored in an SQL database held on a secure server at the Colindale site.
- 3.1.2. Access to 'current' patient-level GUMCAD data will be restricted to a limited list of named HPA staff in Cfi and LRS (nominated users). Such 'full access' users will each have a personal user name and password*.
- 3.1.3. Users will be nominated only by the appropriate data custodian: the Head (or deputy) of STI Surveillance at Cfi, and by the Regional Epidemiologist (or deputy) with responsibility for STIs and HIV in LRS. The list of nominated users will be jointly reviewed by the data custodians each year*.
- 3.1.4. Nominated users will access data relevant to their respective areas of responsibility. For example, Regional Epidemiologists will be able to access patient-level data on patients attending GUM clinics in their region as well as on patients residing in their region who travelled elsewhere to access a clinic.
- 3.1.5. Regional nominated users will directly access patient-level data held on the mirror server at the Colindale site.

- 3.1.6. Non-HPA public health staff (e.g. Public Health Observatories, Primary Care Trusts etc.) with legitimate reasons for analysing the data may access the data in collaboration with and under the supervision of the appropriate local, regional or national HPA body. Access will be restricted to a nominated user who is accountable to HPA. Any work undertaken by a non-HPA body will be governed by a memorandum of understanding between both organisations.
- 3.1.7. 'Current' patient-level GUMCAD data must never be accessed by non-nominated users.
- 3.1.8. Joint posts between the HPA and other public health organisations seeking to undertake analyses should actively be sought to facilitate collaborative working.

*To obtain a username and password please contact your regional HPA office.

3.2. Download and analysis of patient-level data extracts

- 3.2.1. Data extracts of patient-level information for epidemiological analysis must be downloaded by nominated users to a password-protected network drive on a secure server. Downloaded files must be password protected.
- 3.2.2. Data extracts should never be held on computer hard disks, laptops or any transportable storage media such as CDs or memory sticks.
- 3.2.3. Data extracts should be deleted immediately after the purpose for which they were downloaded has been completed. Where extensive analyses are required, nominated users must request permission to keep data extracts beyond 1 year from the appropriate data custodian. Data extracts must not be held for longer than 2 years.
- 3.2.4. Data extracts must not be shared with non-nominated users. If complex statistical analysis of the data by non-nominated users is required, patient GUM clinic numbers must be removed from the data file and replaced with dummy numbers prior to analysis by the elected non-nominated user. Such stripped down files must be managed according to principles 3.2.1-3.2.3 above.
- 3.2.5. Analyses of GUMCAD data will be strictly for the purpose of improving public health.

3.3. Presentation of local-level aggregated data

- 3.3.1. STI data tables at the level of GUM clinic, LSOA, LA and PCT will be distributed in confidence to relevant organisations within the NHS, Department of Health, local government and HPA. Data will also be accessed using GUMCAD automated reports via the HPA MESH web portal *.

*To obtain a username and password please contact your regional HPA office.

- 3.3.2. Requests to publish LA and PCT level data, in hard copy or on the website, should be reviewed on a case by case basis by the appropriate data custodian in consultation with the CfI or relevant regional Caldicott Guardian and the Head of STI Surveillance at CfI.
- 3.3.3. STI data tables at the level of LA and PCT may only be published provided small cell sizes are suitably anonymised. Cells with values between 1 and 4 inclusive must be anonymised with an asterisk. In addition, where the anonymised cell could be deduced from the total, the next smallest cell size in the same row and/or column must also be anonymised.
- 3.3.4. HPA will review the operation of the ONS policy within the HPA as required.
- 3.3.5. When PCT or clinic level data are requested by other organisations (such as for Freedom of Information requests or Parliamentary Questions), small cell sizes must be anonymised according to the protocol described in 3.3.3, above.
- 3.3.6. Maps of STI rates by PCT of residence, where rates are grouped into categories, may be published in reports and on the HPA website.

3.4. Presentation and publication of high-level aggregated data

- 3.4.1. STI data tables at the level of Strategic Health Authority (SHA) and above may be published by the HPA, in hard copy or on the website. Anonymisation would not usually be required but may be considered appropriate in some cases.

3.5. Acknowledging data sources

- 3.5.1. Any analysis undertaken using GUMCAD data which is published in reports, peer-reviewed journals or on the website must acknowledge the data source. “Data from the Genitourinary Medicine Clinic Activity Dataset (GUMCAD), Health Protection Agency”.
- 3.5.2. Academic research presenting data from individual clinics must not be published in peer-reviewed journals without either the prior consent or the collaboration of the lead consultants at those clinics (preferably, the latter).

4. Responsibilities for adhering to policy

- 4.1.1. The GUMCAD data custodian at CfI is responsible for ensuring that patient-level GUMCAD data are held, managed and accessed at the Colindale site in line with Caldicott principles and according to these guidelines.

- 4.1.2. Regional GUMCAD data custodians are responsible for ensuring that patient-level GUMCAD data for their region are managed and accessed in line with Caldicott principles and according to these guidelines.
- 4.1.3. The GUMCAD data custodian at CfI is responsible for ensuring that high-level aggregated data are appropriately anonymised prior to publication on the HPA website or in national reports.
- 4.1.4. Regional GUMCAD data custodians are responsible for ensuring that high-level aggregated data are appropriately anonymised prior to publication on regional websites or in regional reports.
- 4.1.5. Any breaches of this policy should be reported immediately, as follows:
 - 4.1.5.1. Serious breaches, such as loss of patient-level GUMCAD data due to storage on non-permitted media (e.g. CDs, memory sticks etc.), should be reported to the relevant HPA (i.e. CfI or regional) and hospital, community or primary care trust Caldicott Guardians. Reports of serious breaches should be copied to all CfI and regional Caldicott Guardians and to the STI Surveillance lead at CfI.
 - 4.1.5.2. Breaches involving the publication of tabular aggregated data at PCT level or below which has not been anonymised should be reported to the appropriate CfI or regional Caldicott Guardian and copied to the STI Surveillance lead at CfI.
 - 4.1.5.3. Minor breaches such as the publication of anonymised tabular aggregated data at PCT level or below without permission from the relevant data custodian should be reported to the appropriate CfI or regional Caldicott Guardian and copied to the STI Surveillance lead at CfI.