NNPAC permission pathway

The North Node Privacy Advisory Committee's streamlined process is for research that is led by University of Aberdeen or NHS Grampian staff, uses only DaSH ethically approved NHS Grampian datasets and does not have a commercial partner. This single application process encompasses reviews from the Research Governance Team (Sponsor), NHS Ethics, NHSG R&D permission and the NHSG Caldicott Guardian.

Early in your project planning you should contact DaSH to discuss your data and data management requirements and suitability for NNPAC review.

Please note, if you require datasets not covered by NNPAC, all researchers – including those affiliated with the University of Aberdeen (UOA) and NHS Grampian (NHSG) – will need to follow the Full Permissions Pathway. However, if there are datasets you require that are held locally by NHS Grampian, DaSH may be able to amend its Ethics to cover those datasets and your project may be eligible for NNPAC. This should be discussed with DaSH in your initial meeting (see below).

➢ For datasets originating solely from NHS Grampian, you can follow the Full (Local) Permission Pathway here.
➢ For datasets originating from more than one Health Board in Scotland, you can follow the Full (National) Permission Pathway. This pathway is currently under development and will be available on our DaSH website shortly.

Step-by-step process

1. Contact the DaSH team to discuss your requirements, who will confirm the correct pathway for your project and consider your data management protocol. To kick things off, please submit a Project Initiation Document (PID). This helps us understand your project and assess its feasibility with DaSH.

2. Once we have reviewed your PID and confirmed DaSH can support your project, we will schedule an initial meeting. This is a chance to discuss project feasibility, permissions, and the next steps. The DaSH team will then be happy to guide you through creating the three key documents you'll need for your application:

- Data Linkage Plan
- Data Specification File (cohort criteria, datasets and variables required for your project)
- Specific Data Management Plan

3. If you haven't already, confirm you have completed Information Governance Training.

4. Complete the NNPAC Application Form. The DaSH team can provide standard template answers for some of the questions. Guidance notes are available here.

5. Ensure you have all required supporting documentation:

- Protocol
- Data Linkage Plan
- Data Specification File
- Specific Data Management Plan
- Signed and Dated CVs of researchers
- Evidence of Information Governance Training
- Evidence of funding
- Two (2) independent peer reviews (only required if there is no external funding)

6. The DaSH team can review your application prior to submission to ensure completeness and all requirements have been met for submission.

7. Submit your application and supporting documentation to NNPAC, copying the DaSH team.

8. You may receive conditional approval based on changes needing to be made to the application. If so, you will need to revise and resubmit your revised documentation.

Please note that certain projects may also need:

a) **Agreements (e.g. Data Sharing or Processing Agreements)**
Certain projects may also need agreements (e.g. Data Sharing or Processing Agreements). These may be required when projects are deemed to be 'high-risk'. The Information Commissioners Office has guidance on what constitutes 'high risk'.

b) **Data Protection Impact Assessment (DPIA)**
For projects sponsored by the University of Aberdeen (UoA), researchers that may require a Data Protection Impact Assessment (DPIA) should contact the UoA Data Protection Officer, copying in DaSH. For projects sponsored by NHSG, researchers requiring a DPIA should contact the NHSG Data Protection Officer, copying in DaSH. Please also note that permission providers (e.g. ethics) may ask you to confirm that you have considered whether a DPIA is required.

Post-approval

9. Once you have received approval, please contact DaSH with final approval documents.

10. Once DaSH has received your documents, we will assign an Analyst to your project and arrange a pre-linkage meeting with the Analyst to review your datasets and software needs.

International access approval

Researchers needing access to DaSH from outside the UK will require to complete the "Application for Researcher Access from Outside the UK" form. Contact DaSH to provide you the form and guidance. The application is reviewed internally, then forwarded to the

appropriate data controller and data protection team(s). This process applies to researchers from outside the UK, collaborating with international colleagues, or accessing any existing DaSH projects from abroad. We recommend starting this process as early as possible. Approval from all relevant data controllers and data protection teams may take significant time.

Amendments

If **any** changes are to be made to the data required (e.g., changes to cohort, including inclusion or exclusion criteria, date range of datasets, or changes to datasets/additional variables required), to the research staff working on the project, or to the length of time you require access to the project data in DaSH, an amendment must be submitted, reviewed and approved by the NNPAC committee before any changes can be implemented by DaSH. You should contact [DaSH](#) in the first instance to determine feasibility of the amendment and to discuss any extra data requirements that may be needed. An amendment form must then be completed and submitted to NNPAC for review. Please note that changes may result in a re-costing of the project due to additional data processing time or an extension to the length of access.

Annual Progress Report

A progress report should be submitted to the NNPAC committee 12 months after the date on which the study was approved and annually thereafter. Please cc' DaSH into the submission of the report.

End of Study

Once the study is complete and End of Study form must be completed and sent to the NNPAC committee. Please cc' DaSH into the submission of the end of study declaration.

The relevant forms can be found on the [NNPAC website](#).