

Email: penni.rocks@gov.scot

Dear Colleague

RE: GP DATA EXTRACTS DURING COVID-19

Purpose

This letter is a means to notify all GP practices of the use of their GP data for the purpose of supporting the EAVE-2 research project. This is instead of each individual GP Practice, as joint data controller, approving this extract, which in this public health emergency is not feasible.

Background

As we move out of the current lockdown situation, and into a longer term recovery phase of surveillance and monitoring of COVID-19 and its impact, we are very clear about the importance that data will play in helping shape this phase, and in providing clear evidence, analysis and advice to Ministers. Data extracts used in clinical trials are crucial to UK and Scottish Governments Scientific Advisory Groups in providing this evidence, analysis and advice.

One such research project is the Clinical Trial – EAVE-2.

Clinical Trial – EAVE-2

The EAVE-2 research project is a joint project between Public Health Scotland (PHS) and several Scottish Universities. It is one of a number of COVID-19 clinical trials that will be required over the coming months. This clinical trial will provide real time surveillance and research on the COVID-19 pandemic in Scotland. It will permit the estimation of the risk to the whole population and relatively small subgroups and **areas using GP data collected from 5.4m individuals living in Scotland.**

The EAVE-2 research application, and associated Data Protection Impact Assessment document, will be scrutinised and approved/supported through the rapid COVID-19 Public Benefit and Privacy Panel (PBPP) process.

From the Interim Chief Medical Officer
Dr Gregor Smith
Caroline Lamb
Director Digital Health and Care

Date: 14 May 2020

SGHD/CMO(2020)13

For action

NHS Board Primary Care Leads - to cascade to all GPs and Practice Managers

For information

NHS Board Medical Directors
NHS Board Directors of Public Health – to cascade including Caldicott Guardians, Information Governance Leads and eHealth Leads
NHS Board and Special Board Chairs
NHS Board and Special Board Chief Executives
Chief Officers of Health and Social Care Partnerships
NHS Board Directors of Nursing
British Medical Association
General Medical Council
Medical and Dental Defence Union of Scotland
Medical Protection Society
Medical Defence Union
Academy of Medical Royal Colleges and Faculties in Scotland
Care Inspectorate

Further Enquiries to:

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This provides approval from all territorial health boards. Only after its approval, will the required patient identifiable data be extracted from the GP IT systems and transferred to Public Health Scotland (PHS) where patient identifiers will be replaced with anonymous study identifiers, and subsequent appropriate access to those involved in this clinical trial project. Similar to other datasets extracted for COVID-19 research purposes, ***this data is available only for the duration of COVID-19 pandemic*** after which an exit strategy will be put in place to remove all data no longer covered by the approval they were given.

Action

To support this, the required data will be regularly extracted, using the established supplier Albasoft under the direction of NHS National Services Scotland (NSS), from all GP practices at an individual patient level.

Once GP practice data is extracted PHS will become the primary data controller and will be responsible for the integrity of the data outside the GP IT systems. Appropriate security and information assurances are already in place to control this data in a managed and secure way.

All COVID-19 information assets will be logged and audited by PHS so that post COVID-19 pandemic, these assets can be decommissioned appropriately as part of an exit strategy.

Due to the emergency situation, there is a need to start these clinical trials immediately.

Next Steps

COVID-19 Recovery phase

Going forward we are clear that there will be many other COVID-19 projects (not related to EAVE-2) that need access to the GP data extracted. We recognise the difficulties in continuously contacting each GP Practice for every COVID-19 research project that requires access to the data and the burden this approach would be.

To overcome this and to provide access to this GP data for other COVID-19 research projects as quickly as possible but with minimum burden on everyone, we are keen to develop a COVID-19 model of assurance that will allow the GP data extracted for EAVE-2 to be used for other COVID-19 purposes. This model would be developed so that GP representation becomes part of the rapid process for projects that require access to this GP data.

Finally, the ICO recognises the need for us to make rapid decisions about how to process personal data to respond effectively to the crisis and that normal compliance procedures may need to be adapted during this Covid-19 pandemic. Changes to our normal compliance procedures includes the use of this letter as a means to notify all GP Practices of the use of their GP data rather than seeking agreement from each GP Practice, as joint data controllers.

We hope that this gives you assurance around the crucial use of GP data to help steer this next critical phase in our COVID-19 journey.

We are very grateful for all your hard work in supporting the country through this public health emergency and thank you for your co-operation and support to facilitate much needed

research to find effective interventions control the epidemic and prevent future waves a much as possible.

Yours sincerely

Gregor Smith

Caroline Lamb

DR GREGOR SMITH

CAROLINE LAMB