

GP Data for Planning and Research
Check and Challenge Group
Minutes of the meeting held 11th May 2022
Final – Approved for publication

Attendees

Name	Organisation	Name	Organisation
Nicola Byrne Chair	National Data Guardian	Tim Donohoe	NHS Transformation Directorate
Helen Stokes-Lampard	Academy of Medical Royal Colleges	Ben Goldacre	Nuffield Department for Primary Care Health Sciences
Ian Hulme	Information Commissioners Office	Nicola Perrin	Association of Medical Research Charities
Ruth Ellenby	Royal College of General Practitioners	David Parkin	British Medical Association
Paul Atkinson	Royal College of General Practitioners	Michael Lewis	National Institute for Health Research
NHS Digital Programme Team Representatives			
Further representatives from: <ul style="list-style-type: none"> • Office of the National Data Guardian (1 attendee) • NHS England Clinical Observer (1 attendee) • NHS Digital TRE Programme (2 attendees) 			

Actions & Decisions Recorded

Action ID	Description	Owner	Target Date
CAC-A009	Amend action notes from April 27 th to better detail discussion on public understanding and technical differences between TREs and SDEs, and detail action to include further discussion on subject at future meeting	Programme Team	Complete
CAC-A010	Review which specific data access security elements need to be in place for the TRE meet the ministerial commitments	Programme Team	22/06/2022
CAC-A011	Review current deployment of OpenSAFELY within NHS Digital and potential requirements and timelines to use for GDPR	Programme Team	22/06/2022
CAC-A012	Review the TRE readiness proposal based on member feedback and iterate as required.	Programme Team	22/06/2022
CAC-A013	Review the draft process document outlining the approach to agree how the programme will meet the set of ministerial commitments, and provide feedback to the programme team to support discussion at the next meeting	All Members	08/06/2022

Meeting Notes

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Introductions and update on previous actions

- Chair welcomed members to the call and introduced meeting agenda
- Chair noted that previous actions had become less timebound and part of ongoing purpose of the advisory group. Members agreed with proposal to close previous actions and focus on specific timebound actions recorded within meetings
- All open actions agreed as closed, but programme team will retain these areas of focus during future topics as per the terms of reference.

Ratification of previous action notes ahead of publication

- Chair noted minor amendments received to the previous notes have been agreed
- Request noted for a minor amendment to action notes to further detail the discussion held on the differences between Trusted Research Environments (TREs) and Secure Data Environments (SDEs) when presenting public research on understanding and sentiment on the terminology. Amendment to also include the subsequent request to revisit the topic at a future meeting. Action taken for the programme team to amend notes and redistribute to specific member for approval prior to note publication **(CAC-A009)**

Discussion on requirements for TRE to meet ministerial commitments

- Focus of presentation on reviewing the requirements of the TRE to meet the ministerial commitments, and impact of commitments on current and future use cases
- Noted that there are still policy questions to be answered about whether a Trusted Research Environment (TRE) is technically the same as a Secure Data Environment (SDE), or if the latter has a different technical specification or requirements.
- Discussion points were as follows:
 - A discussion was held about the commitment that GDPR data must never leave the NHS. This has implications for some use cases as data could only be linked where NHS Digital can host the data in their TRE
 - It was noted that wider parallel initiatives are ongoing to review how other data requirements of the NHS can be met.
 - The programme proposed that the GDPR TRE would be designed with pseudonymised data that only approved applicants have permission to analyse for specific uses, and further protections supplied through data sharing contracts and agreements (safety by contract). The TRE will ensure that only results can be taken

from the TRE and the data will remain in situ. The TRE will also be benchmarked against the same standards used by the ONS TRE

- The programme also discussed additional safety features , whereby as well as the contractual controls above, automated processes are used to apply protections and minimise data as standard without the need for manual intervention. One such process would be that researchers are required to use synthetic (fake) data to develop their queries, which will then generate aggregate results from the real data which the user never sees.
- The delivery team took an action to clarify which specific data access security elements need to be in place before the data would flow **(CAC-A010)**
- Members noted that safety by contract was the current process, and felt that even with the additional protections of the data being in a TRE and no data being disseminated, this alone would not demonstrate enough progress to satisfy public confidence
- It was noted by members that OpenSAFELY is already implemented in a limited capacity in NHS Digital and questioned as to why this could not be quickly implemented to allow inclusion within the initial release in a timely manner. Action taken by GDPR and TRE teams to review this and bring back to members **(CAC-A011)**
- It was also noted by members that there were some unconfirmed concerns within the research community that use of OpenSAFELY may require training and education to ensure widespread use
- Members agree that the current proposal does not meet the commitments. Action taken for the programme to iterate the proposal based on the feedback provided **(CAC-A012)**

AOB

- It was noted that the draft process document outlining the approach to agree how the programme will meet the ministerial commitments has been shared with all members. Members were requested to read the document and provide feedback ahead of a discussion on the next meeting. Action agreed by members **(CAC-A013)**
- It was agreed that the key focus was to ensure that the agreed set of requirements will drive any delivery timeline and not the other way round
- Members were thanked for their time and input during the session, and the meeting was closed by the Chair