

Cartwright Greg

From: Clarke Dave
Sent: 22 January 2018 16:01
To: Kumar Satheesh; Cartwright Greg
Cc: Kirkland Sam
Subject: RE: MSc Dissertation

Dear Satheesh

I have just spoken at length to Greg regarding this proposed MSc work. Whilst being mindful of the timescales involved for this qualification, this should not influence consideration of whether what is being proposed is within remit for a full review by the Health Research Authority (and by NHS Ethics).

Having further reviewed the Project proposal and talked it through with Greg, I am content that this is not currently research within the HRA remit (as indicated by the HRA Decision Tool), as it is dealing purely with a single question of association (between frailty and pre-emptive planning) within a single service (Community Hospital), with data that is routinely collected rather than gathered purely for the sake of the study. Whilst eventually, the question as to whether frailty assessment should lead to pre-emptive intervention to improve outcomes may be amenable to a formal study and to being generalizable, the current project is best seen as a service evaluation (or "pre-protocol" research), which may provide baseline data for further exploration; I understand from Greg that the proposal is being reviewed shortly at the CHS CASE group, which can therefore provide management "sign-off" as such.

This then leaves just the issue of Caldecott compliance, which is much simplified by the absence of the need for HRA Review and the potential for Confidentiality Advisory Group involvement. As Greg is part of the clinical team as a ANP, his access to this data is entirely legitimate, and it is not unreasonable to argue that the processing of data from the EPR is an entirely reasonable clinical management issue. Also, nothing will change from the patient experience as a result of this study, except perhaps to give consideration to incorporating the suggesting planning within future practice (which could itself be a "proper" research study). In terms of the provisions of GDPR, then this is a prima facie case for the Trust to be stating that as a "data processor", the use of data in this way would be expected: that this is being recognised through CASE is sufficient.

So, in short, CASE sign-off, together with South Bank University ethical review should be sufficient to sign-off this high-level service evaluation.

Kind regards

Dave

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