

COMPENSATION RESEARCH DATABASE DATA ACCESS POLICY

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1. BACKGROUND

The Compensation Research Database (CRD) is a database established by the ISCRR at Monash University. The CRD holds population-wide individual-level data derived from the administrative records of WorkSafe Victoria and the Transport Accident Commission (TAC). WorkSafe and the TAC provide data to ISCRR in accordance with the study protocol as approved by the University ethics committee. A data dictionary is available by contacting ISCRR.

The purpose of this policy is to provide a transparent mechanism for enabling access to data for research purposes while preserving the integrity and confidentiality of the data and retaining the integrity of data stewardship of WorkSafe Victoria and the TAC. The policy details the considerations in the evaluation of Data Access Requests.

The principles that inform this policy are:

- Interest in supporting research and expanding the data sources available for research purposes.
- Access to and use of data must conform with the legislative and policy requirements of WorkSafe Victoria, the TAC and Monash University.
- Access to and use of data must conform with relevant legal and ethical requirements.
- All parties recognize their own and each other's obligations and responsibilities.
- Clarity and transparency of the data access review process and procedures will benefit all those involved.
- These guidelines will be treated as a "living document", and will be reviewed periodically by the ISCRR and where new legislative or government policy requirements necessitate revisions.

2. DEFINITIONS

CRD Steering Committee - The CRD is governed by a steering committee including representatives of ISCRR, Monash University, WorkSafe Victoria and the Transport Accident Commission. Access to data is subject to the approval of the Steering Committee.

Eligible Researcher – A Researcher is a student, academic or other individual enrolled, appointed or employed by a university, research institute or equivalent educational or research institution. Where a student is applying for data access, the supervisor must take responsibility for the project, approve the data access request and be a signatory to the research agreement with ISCRR. The CRD steering committee may, at its discretion, consider other individuals to be an eligible researcher will be referred to TAC and WorkSafe

Victoria as a matter of course.

Eligible Research - To be considered eligible, the proposed research must:

- Be for the time-limited purpose of addressing a specific research question or set of research questions
- Not involve use of data for administrative or any other non-research purpose, or for ongoing programs of research, unless specifically approved
- Be in the public interest, for example, improves the welfare of the working population
- Not be proprietary research such as research done for commercial marketing purposes
- Have scientific merit
- Have approval from a recognised Research Ethics Committee, as defined by the National Statement on Research Involving Humans published by the National Health and Medical Research Council (NH&MRC). Researchers will be asked to submit a copy of their approved ethics application to ISCR (for information only).
- Be aligned with the research priorities identified in the ISCR five-year research strategy (available from www.iscr.com.au)

Scientific merit is met if the research is funded by a recognised granting agency, such as NHMRC or Australian Research Council. In the case of graduate students, a letter from the supervisor supporting the research must be provided and may serve the purpose of proof of scientific merit. In the absence of peer review funding, the CRD steering committee can request a one-off peer review to determine eligibility, at its discretion.

Data Access Request - An application for data held in the CRD. This request includes project details, cohort details, fields and files requested, data analysis plans, and supporting documents. It is this document that is reviewed by the CRD steering committee.

Research Agreement - A legally binding agreement between ISCR and the Researcher describing the conditions of use of the Data Summary.

Data Summary - Data that are extracted and prepared by ISCR for the purpose of disclosure to a researcher for an approved research project. This requires the existence of an approved Data Access Request and a signed Research Agreement.

Data Custodian - The public body providing unit level data to ISCR for inclusion in the CRD. There are two data custodians for the CRD: WorkSafe Victoria and the Transport Accident Commission.

Data Summary Fee - A fee charged (at cost recovery rates) for the preparation of data for the approved Data Access Request.

Identifiers - Information that identifies an individual or for which it is reasonably foreseeable in the circumstances of use that could be utilised, either alone or with other information, to identify an individual.

WorkSafe Victoria - The data custodian for the workers' compensation dataset on the CRD. The statutory authority responsible for the administration of the workers' compensation system in the state of Victoria, established under the Accident Compensation Act (1985).

Transport Accident Commission - The data custodian for the transport accident compensation dataset on the CRD. The statutory authority responsible for the administration of the transport accident compensation system in the state of Victoria, established under the Transport Accident Act (1986).

Monash University - One of Australia's largest academic institutions. Established by an Act of parliament in the state of Victoria in 1958.

ISCRR - The Institute for Safety, Compensation and Recovery Research. Established as an institute of Monash University via the RICA.

Research Institute Collaboration Agreement (RICA) - The agreement entered into between WorkSafe Victoria, the TAC and Monash University to establish the ISCRR and allow ISCRR to access to WorkSafe and TAC administrative data for research purposes.

3. DATA ACCESS PROCESS

The following section describes the data access process and the policy at each stage of the process.

3.1 Data Access Request

The Researcher plans, completes and submits a Data Access Request with associated documentation e.g. a full ethics application and approval, confidentiality agreements and data check forms. A Data Access Request must be in writing to the Chief Research Officer (CRO) of ISCRR, and must utilise the CRD Data Access Request form (available from www.iscrr.com.au).

3.2 Review by CRD steering committee

The submitted Data Access Request will be initially considered by the steering committee. A decision on whether to grant access to the data will be made following consideration by the steering committee. Steering committee meetings are held quarterly and data cannot be extracted until approval is given. Under exceptional circumstances, when data is required earlier, the CRO of ISCRR may convene an extraordinary meeting of the steering committee to consider specific data requests. Once approval has been received, it may take up to 4-6 weeks to supply the data.

All uses of CRD data by third party Researchers must receive prior approval from the steering committee. Among the criteria considered by the steering committee are the following:

- Demonstrated reasonable need for the requested data to answer the specified research question(s).
- The use of data is not harmful to the individuals that the information is about.
- The proposed research is clearly in the public interest.
- The proposed research is consistent with ISCRR's five-year research strategy.
- Scientific merit (peer- or merit-reviewed).
- Ethical considerations.

3.3 Research Agreement

If the Data Access Request is approved by the steering committee, the Researcher will be asked to enter a Research Agreement with ISCRR. Among other things, the Research Agreement describes the data to be delivered, the use of the data, the fees involved in data preparation, the responsibilities of Researchers in working with the data, and the recourse available to ISCRR and the Data Custodians should the Research Agreement be breached. Data will not be provided to Researcher until this agreement has been completed.

3.4 Data Preparation and Delivery

Once the Research Agreement has been executed, ISCRR will prepare a Data Summary and deliver this to the Researcher. In all cases, the researchers would be provided with aggregate data only. Under no circumstances will individual unit record data be made available to third parties as this contravenes confidentiality and data access policies as required under privacy legislation and ethics agreements. However, researchers may request ISCRR to undertake specific analyses of data.

Data will be prepared in accordance with the approved Data Access Request. The provision of Data Summaries will be subject to a fee-for-service. See Data Access Fees document for an explanation of these fees.

3.5 Data Analysis and Interpretation

The Researcher is responsible for analysing the data they receive. Researchers are strongly encouraged to discuss their Data Access Request with a member of the CRD team prior to submission. Engaging a member of the CRD team reduces the risk of inaccurate interpretation of results as they will understand the strength and limitations of the data. The Researcher may request that ISCRR undertake some analysis of the data on a fee-for-service basis.

3.6 Data Retention and Destruction

The period of data retention will be study specific and described in the Research Agreement. ISCRR will maintain a copy of all Data Summaries for this period of time from the date of execution of the signed Research Agreement. Researchers will be able to access this data during that period of time, as long as privacy provisions are met. Researchers may request to extend the data retention date by application to the CRD steering committee. The CRD requests that an annual report be submitted by researchers about the use of the data and any associated project outcomes and/or outputs.

3.7 Research Outputs and Pre-publication Review

As stipulated in the Research Agreement, all research outputs (including journal articles, slide decks for public presentations, and reports) must be submitted for review by the CRD steering committee prior to public disclosure. Materials for review should be submitted to the CRD project manager at ISCRR. Electronic submission is preferred i.e. MS Word or PDF format. The CRD project manager will forward the materials to the Data Custodians and CRD steering committee for review. The Data Custodians and CRD steering committee will be deemed to have approved

materials for public disclosure unless the researcher is notified to the contrary within 45 calendar days of the receipt of the materials.

Researchers must acknowledge ISCRR and the Data Custodians in any public disclosure of the data using the Publication Guidelines (available from www.iscrr.com.au).

3.8 Project Closure

CRD project staff at ISCRR must be informed when a research project is complete. CRD staff will then provide the researcher with project closure documentation which detail the steps necessary to destroy and/or return all data to ISCRR at the conclusion of the research project, as stipulated under the Research Agreement.

3.9 Data Linkage Projects

Research proposals to link the CRD to other datasets will be considered on a case-by-case basis by the steering committee. This policy is not intended to cover such data linkage projects.

4. RESPONSIBILITIES OF PARTIES

4.1 Responsibilities of Researchers

The researcher agrees to all conditions of use set by the ISCRR, the CRD steering committee or the CRD Data custodians, which may include (but are not limited to) the following:

- Data are to be used only for the research questions approved by the CRD steering committee and described in the Research Agreement.
- Data will be retained for a limited time, normally set at an initial two years, with the possibility of extension with approval of the CRD steering committee.
- Any requested changes to the research question(s), researcher(s) or time frames must be submitted to ISCRR for review by the CRD steering committee.
- Research Ethics Committee approval certificates must remain current throughout the data retention period.
- Data are to be accessed only by named staff who have signed confidentiality agreements.
- Researchers will be asked to participate in the ISCRR's data documentation efforts by contributing data analysis concepts and related code fragments, which will also be made available to the Data Custodians.
- Researchers will submit an annual report to the Data custodians about the uses of the data and any associated project outcomes and/or outputs.
- Researchers will provide timely payment of the specified cost-recovery charges for data preparation and corresponding data services.
- Researchers will be asked to provide the evidence that they have enough personnel to complete the project, as data extraction process can be intensive on ISCRR resources.

4.2 Responsibilities of ISCRR

ISCRR will undertake the following broad responsibilities:

- Provide support to the CRD steering committee
- Commit to timely review of Data Access Requests
- Maintain stewardship and control of the CRD data
- Support the research community by supporting access to CRD data in a privacy sensitive manner
- Provide access to approved Data Summaries as authorized by the CRD steering committee.

If ISCRR learns of or suspects non-compliance with an approved Research Agreement, ISCRR will immediately notify the relevant Data Custodian. Examples of possible responses may include any or all of the following, plus other remedies available under the terms of Research Agreements or under law, at the discretion of the Data Custodians:

- Suspension and / or revocation of data access approval.
- Denial of any further access to CRD data holdings or other data holdings of the Data Custodian.
- Reporting of non-compliance to the researcher's home institution.
- Reporting of non-compliance to the Research Ethics Committee that provided approval for the project.
- Reporting of non-compliance to all agencies that provided funding for the project.
- Reporting of non-compliance to any organizations who have published findings from the study

4.3 Responsibility of Data Custodians

The role of the WorkSafe and the TAC in relation to the CRD is to:

- Provide data to ISCRR as outlined in the RICA
- Participate in the CRD steering committee
- Communicate and discuss the development of policies, guidelines, or processes for access to data, through the CRD steering committee;
- Ensure CRD policies, processes and practices support the needs of the Data Custodians.