

# COMPENSATION RESEARCH DATABASE DATA ACCESS POLICY

AUGUST 2014

## 1. BACKGROUND

The Compensation Research Database (CRD) is a database established by ISCRR at Monash University. The CRD holds population-wide individual-level data derived from the administrative records of WorkSafe Victoria (WSV) and the Transport Accident Commission (TAC). WSV and the TAC provide data to ISCRR in accordance with the study protocol as approved by the University ethics committee. Data dictionaries are available from <http://www.iscrr.com.au/research/comp-database/index.html>.

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 WSV 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 WSV, the TAC and Monash University
- Access to and use of data must conform with relevant legal and ethical requirements
- All parties recognise 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** – The Compensation Research Database (CRD) - a database established by ISCRRR at Monash University. The CRD holds population-wide individual-level data derived from the administrative records of WorkSafe Victoria (WSV) and the Transport Accident Commission (TAC).

**CRD Steering Committee** – The CRD is governed by a steering committee including representatives of ISCRRR, Monash University, WSV and the TAC. Access to data is subject to the approval of the Steering Committee.

**Data Access Request Form**- A data access request form for WSV or TAC data held in the CRD. This data access request form includes the researcher's contact details, 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.

**Data Custodian** - The public body providing individual-level data to ISCRRR for inclusion in the CRD. There are two data custodians for the CRD: WSV and the TAC.

**Data Extract** - Data that are extracted and prepared by ISCRRR for the purpose of disclosure to a researcher for an approved research project. This requires the existence of an approved data access request form and a signed Research Agreement. Data extract will be provided to the researcher at the individual-level or aggregated-level based on the approved criteria.

**Data Extract Fee** – The cost-recovery fee that may be charged for the preparation of data for the approved data access request.

**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 ISCRRR. A researcher who is based outside of Australia may also apply for data access and should be discussed with the Data team. The CRD steering committee may, at its discretion, consider other individuals to be an eligible researcher, and will refer to the TAC and VWA as required.

**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 health 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 (NHMRC). Researchers will be asked to submit a copy of their approved ethics application to ISCRRR (for information only).
- Be aligned with the research priorities identified in the ISCRRR five-year research strategy (*Strategy 2020* - available from [www.iscrr.com.au](http://www.iscrr.com.au))

Scientific merit is met if the research is funded by a recognised granting agency, such as the NHMRC or Australian Research Council (ARC). 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.

**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.

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

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

**Research Agreement** – An agreement between ISCRRR and the researcher/s describing the conditions of use of the Data Extract.

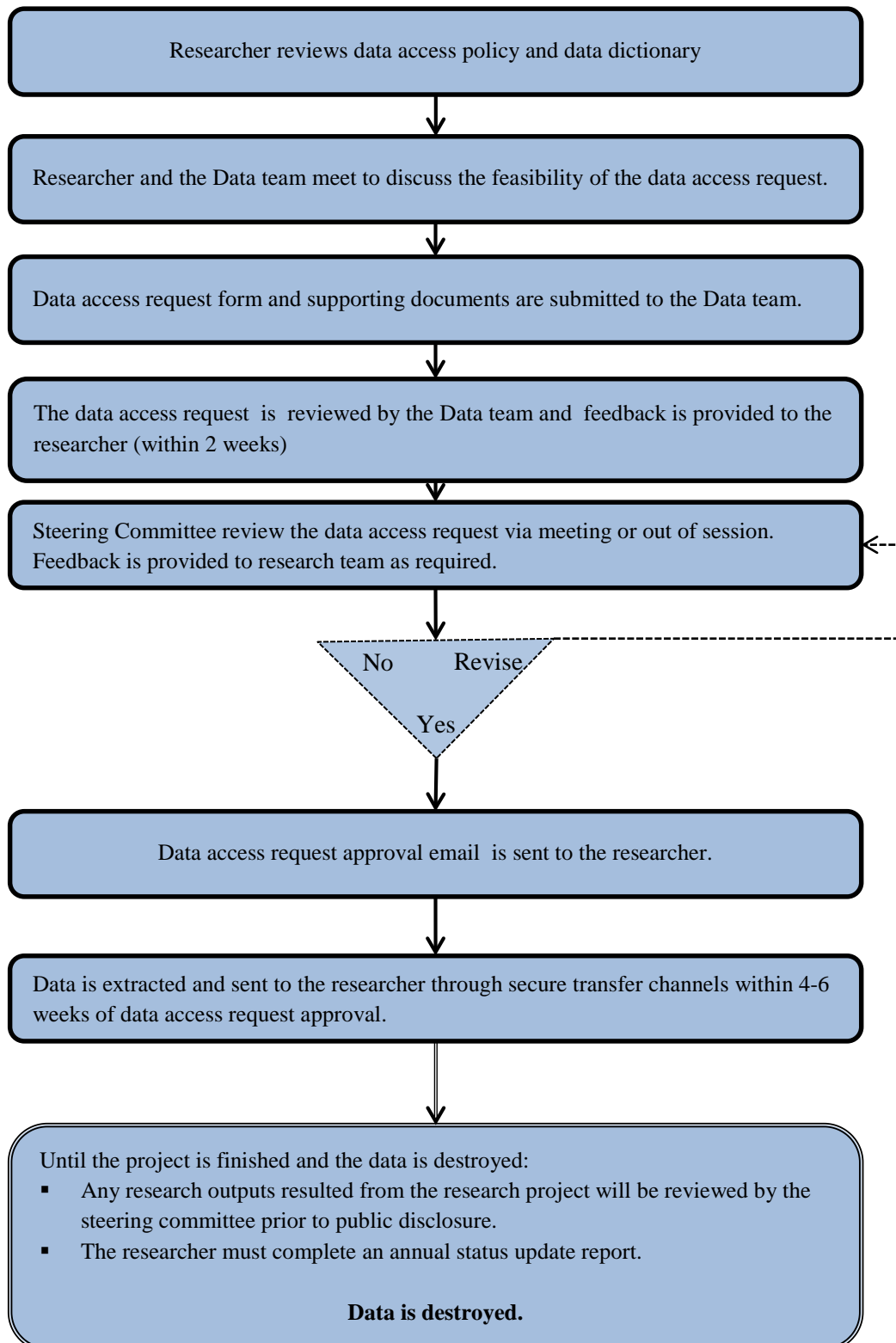
**Research Institute Collaboration Agreement (RICA)** - The agreement entered into between WSV, the TAC and Monash University to establish the ISCRRR and allow ISCRRR to access to WSV and TAC administrative data for research purposes.

**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).

**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).

### 3. DATA ACCESS REQUEST PROCESS

The following section describes each step of the data access request and provision process. An overview of the data access request process is shown below in Figure 1.



### 3.1 Data Access Request

Researchers should discuss the feasibility of their data access request with a member of the Data team prior to submission. The researcher then completes and submits a data access request form and associated documentation (a full ethics application and approval and confidentiality agreements). A data access request must be submitted in writing to the Data team ([crd@iscrr.com.au](mailto:crd@iscrr.com.au)), and must use the data access request template provided (available from the Data team on request).

#### 3.1.1 Data Access Request for Large Data Extracts

In case of requests for large extracts of data (as deemed by the Steering Committee), provision of a random sample of the data may be offered to the researcher as a condition of approval. The sampling may be done at 10, 25, or 50 per cent level depending on the request size to ensure statistical robustness of the analysis. The size of the random sample will be recommended by the Data team and approved by the Steering Committee.

### 3.2 Review by CRD Steering Committee

A decision on whether to grant access to the data will be made following consideration of the data request by the steering committee. Steering committee meetings are held quarterly and data cannot be extracted until approval is given. Under some circumstances the committee will consider requests out of session. 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 researcher must receive prior approval from the steering committee. The following criteria is considered by the committee when reviewing requests:

- Demonstrated reasonable need for the requested data to answer the specified research question(s) including the potential similar projects undergoing at ISCR or the schemes.
- The use of data is not harmful to the individuals that the information is about. For example, the size of the data extract is large enough to ensure that individual-level cases will remain non-identifiable.
- The proposed research is clearly in the public interest
- The proposed research is consistent with ISCR's five-year research strategy
- Scientific merit (peer- or merit-reviewed) of the research project
- The competency of the researcher to undertake the proposed methodology
- Ethical considerations, such as how the data will be stored and protected.
- The researcher meets the eligibility requirements (as defined on page 2).

### **3.3 Research Agreement**

If the data access request is approved by the steering committee, the researcher will be required to sign a Research Agreement with ISCRR. This outlines the responsibilities of the researcher in working with the data (as described in this data access policy), and the recourse available to ISCRR and the Data Custodians should the Agreement be breached. The agreement incorporates the data request form, confidentiality deed, ethics application and confidentiality deed.

### **3.4 Data Preparation and Delivery**

Once the Research Agreement has been finalised ISCRR will prepare the data extract for the researcher. The data extract will comprise either a de-identified individual-level record data or aggregated data.

Data will be prepared in accordance with the approved data access request. The provision of the data extract may be subject to a fee-for-service, and will be discussed with the researcher in advance of submitting their request.

### **3.5 Data Analysis and Interpretation**

The researcher is responsible for conducting all analysis on the data they receive.

The Data team have a strong understanding of the strengths and limitations of the data, so researchers are encouraged to discuss their data analysis plan with the Data team to help reduce the risk of inaccurate interpretation of results.

### **3.6 Research Outputs and Pre-publication Review**

As stipulated in the Research Agreement, all research outputs (including journal articles, report and slides for public presentations) must be submitted for review by the CRD steering committee prior to public disclosure. Materials for review should be submitted to the Data team. Electronic submission is preferred i.e. MS Word or PDF format. Both the Data team and Data custodians will review and provide feedback on outputs. 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 20 business days of the receipt of the document/s.

Researcher must acknowledge ISCRR and the Data Custodians in any public disclosure of the data using the acknowledgement and authorship guidelines (see ISCRR authorship guidelines available at [www.iscrr.com.au](http://www.iscrr.com.au)).

### **3.7 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 extracts for this period of time from the date of execution of the signed Research Agreement. The researcher will be able to access this data during that period of time, as long as privacy provisions are met. The researcher may request to extend the data retention date by application to the CRD steering committee. An annual status update report must be submitted by the researcher about the use of the data and any associated project outcomes and/or outputs (template will be provided).

#### **3.7.1 Data Access Request Update**

Researchers may request an updated data extract of their original data access request if their initial research project agreements and ethics approvals are still valid. If new data are available and the updated data access request is identical to the original data access request, approval by the steering committee is not required. Changes made to the original data access request will be treated as a new data access request.

### **3.8 Project Closure**

The Data team must be informed when a research project is complete. Data team 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 that seek 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. It should be noted that the Data team do not have access to identifiers so any linkages are conducted through the Data Custodians, via ISCRR.

## **4. RESPONSIBILITIES OF PARTIES**

### **4.1 Responsibilities of Researcher**

The researcher agrees to all conditions of use set by ISCRR, the CRD steering committee and 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, and may be referred to 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 has signed confidentiality agreements
- The researcher will be asked to provide evidence that they have enough personnel to complete the project, as data extraction process can be intensive on ISCRR resources.
- The researcher will be invited to participate in ISCRR's data documentation efforts by contributing data analysis concepts and related code fragments, which will also be made available to the Data Custodians
- The researcher will submit an annual status update report to ISCRR about the uses of the data and any associated project outcomes and/or outputs, which is reviewed by the steering committee. The steering committee has the right to deny or "suspend" any further access to the data if the data access policy has been breached.
- Where applicable, the researcher will provide timely payment of the specified cost-recovery charges for data preparation and corresponding data services

## **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 managing access to CRD data in a privacy sensitive manner
- 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 organisations who have published findings from the study

### **4.3 Responsibility of Data Custodians**

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

- Provide data to ISCRR as outlined in the RICA
- Actively participate in the CRD steering committee, including timely review of data requests.
- 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 and encourage use of CRD data by researchers.