GDPR Best Practice Approach to Undertaking Research Projects using Personal Data:

Can anonymised data be used to achieve the aims of the proposed project?

Yes / **No**

Yes – Proceed with proposed project using data anonymised by the data controller without requiring consent.

No – Can pseudonymised data be used instead with appropriate safeguards?

Yes / **No**

Yes – Proceed with proposed project ensuring that the key to a person's identity is retained by the data controller only and not revealed to third parties.

No – Patient consent is normally required.

Has consent for research purposes been secured in relation to the files previously?

Yes / **No**

Yes – Is this consent valid (specific enough) to cover this particular research project proposal?

Yes / **No**

No – specific, informed, freely given consent must be captured from individuals by the data controller.

Yes – Proceed with research project (subject to adequate safeguards being in place in relation to security etc.).

Once valid consent is in place, the research project can proceed (subject to adequate safeguards being in place in relation to security etc.).