

Title

NHG Research Data Policy – Trusted Third Party (TTP)

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As a researcher, you may have heard of this term - “Trusted Third Party (TTP)” being brought up together with the concept of data de-identification/ anonymisation. You might wonder -

- 1.What is the link between TTP and data de-identification/anonymisation?
- 2.What is a TTP?
- 3.Who can be a TTP?

To answer these questions, this article provides an overview of the TTP concept supplemented with practical tips like workflows for De-identification/ Re-identification involving TTP that will smoothen your research study journey.

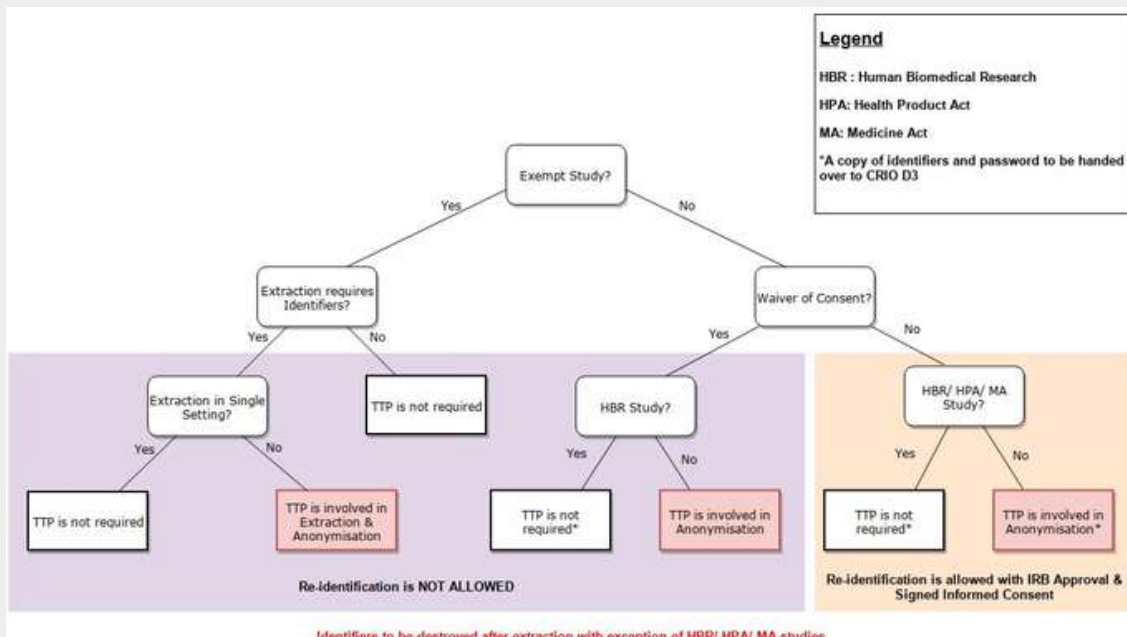
What is a Trusted Third Party (TTP)?

A Trusted Third Party (TTP) is an employee of NHG institution who is authorised to anonymise or de-identify research data. **Note that a TTP cannot be a user or beneficiary of the data or study that the request was made for.**

Apart from anonymisation of data, the TTP will become the holder of personal data (identifiers) for some studies (as shown in the diagram below). Hence, they are responsible for safeguarding the identifiers and cannot disclose it to anyone unless study team has obtained the necessary approvals from institution (PorT) and IRB for re-identification.

In some cases, TTP might be tasked with data extraction especially when the extraction process requires identifiers and study team is unable to hold identifiers during the data extraction.

When to engage a TTP?



*Anonymisation is a reversible or irreversible process of converting personal data to data which can no longer be used to identify specific individuals..



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Who can be a TTP?

- No conflict of interest to data, study and study team
- Not part of study team and not directly affiliated* with any study team member
- Personnel holding appointment in TTSH or an employee of TTSH holding valid personal TTSH ADID account

What are the competencies required for a TTP? (Please refer to the latest requirements)

- Familiar with Personal Data Protection Act (PDPA) and PDPC Guidelines¹
- Familiar with PDPA's Guide to Basic Anonymisation Technique²
- Familiar with TTSH Personal Data Protection Policy and TTSH Data Breach Policy**
- Familiar with MOH HIM Guidelines and Circular**
- Familiar with all relevant NHG ICT policies on data security and handling of personal data**
- Familiar with HIM-DM**
- Familiar with NHG Research Data Policy**
- Recommended to have a valid CITI certification during the period as the role of TTP

What happens if I am unable to find a TTP?

Study team can approach recognized TTPs: CRIO D3 (for research), OCEAN and NCID Research Office*** (for NCID research only).

What happens if I need to change TTP?

If there are changes to the TTP (eg. leaving the organisation), PI must submit a new Declaration Form to CRIO D3 (crio_d3@ttsh.com.sg) and ensure that the identifiers & the password are transferred to the new TTP.

What is the workflow for Anonymisation?

- Study Team to raise PORT request
- PORT to forward research study request to CRIO D3 for evaluation
- CRIO D3 will evaluate and inform study team to register dedicated TTP via TTP Declaration Form⁴ if needed for the project
- CRIO D3 will inform PORT to proceed for approval after evaluation
- Once PORT is approved, CRIO D3 will provide TTP with a storage space to store the identifiers
- Dedicated TTP can proceed with the request and destroyed/send a copy of the identifiers & password to CRIO D3 with reference to the diagram above

*Directly affiliated – Direct Reporting Office, Mentor, Supervisor

** Please refer to TTP Webpage in the CRIO Intranet - <http://ttshcru/crio/ttp.html>

*** CRIO to maintain oversight over TTP activities in NCID Research Office

References:

1. PDPA's Guide to Basic Anonymisation Technique - <https://www.pdpc.gov.sg/-/media/Files/PDPC/PDF-Files/Advisory-Guidelines/Guide-to-Basic-Anonymisation-31-March-2022.ashx>

2. NHG Research Data Policy - https://mynhg.nhg.com.sg/dept/rcu/_layouts/15/WopiFrame2.aspx?sourcedoc=%2Fdept%2Frcu%2FShared%20Library%2FResearch%20Data%2FNHG%20Research%20Data%20Policy%2Epdf&action=view

3. PORT - <https://form.gov.sg/#!/5c4faba2cf23170017e310d55>.

4. TTP Declaration Form - <http://ttshcru/data/Essential%20Forms%20%20Checklists/TTP%20Declaration%20Form.pdf>



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What is workflow for Re-Identification?

- Study team to obtain valid IRB approval for re-identification
- Study team to raise PORT request - with IRB approval and signed informed consent of re-identified subject
- PORT to forward research study request to CRIO D3 for evaluation
- CRIO D3 will inform PORT to proceed for approval after evaluation
- Once PORT is approved, study team to inform dedicated TTP for re-identification

We hope you have found this article helpful in deepening your understanding about TTP. To learn more about TTP, you can refer to the TTP Guide⁵. We also welcome you to reach out to crio_d3@ttsh.com.sg for any further queries

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