PROTOCOL FOR THE SUBMISSION OF REQUESTS TO CONDUCT RESEARCH USING NHF DATA/FACILITIES/CUSTOMERS

The National Health Fund (NHF), an agency of the Ministry of Health and Wellness, in the course of its operations collects valuable data which contribute to a better understanding of behaviour, utilization trends and infrastructural/system gaps in relation to healthcare.

In conducting research, individuals can submit requests to NHF for access to data and/or patients in order to undertake the exercise. These requests can originate in varying sectors, including but are not limited to students fulfilling requirements when pursuing programmes at tertiary institutions. Request(s) should be sent four months in advance of commencement date to allow for review and evaluation.

The NHF will conduct a review and evaluation of the research proposal to ensure that all requisite research protocols are in place in order to administrate the exercise. Any decision to allow access to data will be guided by the applicable industry laws including the Data Protection Act, as this is of critical importance given that due regard must be taken for confidentiality and protection of patient data/information, and prevention of access to and/or exposure of any sensitive information.

Application Guidelines

The following outlines the requirements and process for considering research requests submitted.

Submission shall include:

1. A letter requesting permission to conduct research should be addressed to the Chief Executive Officer, NHF, and should be accompanied by the following documents.
    a. A copy of the research proposal
    b. A copy of the letter of approval from the relevant institution's ethics committee, where applicable
    c. A copy of the letter of approval from the relevant Regional Health Authority Ethics Committee and/or Ministry of Health and Wellness, where applicable
    d. Letter from Research Supervisor/head of school, where applicable
    e. Declaration of conflicts of interest
    f. Any other documentation which may be deemed relevant and could inform the decision making process based on the nature of the research

Process

1. Once proposal is received in the Individual Benefits and Research Department, checks will be made to ensure all required submissions have been received, and that the content meets the defined research standards.
2. A Data Protection Impact Assessment will be conducted by the Individual Benefits and Research Department to determine the level of risk associated with the requirements of the study and whether this request can be accommodated by the NHF.
3. If all requirements are not met, the researcher(s) will be notified, informed of the gaps and asked to provide the additional information. The process will not progress further until this has been done.
4. If all requirements are met, a review and evaluation of the documents will be conducted based on the guidelines, and a decision made.
5. Once approval has been granted, the researcher(s) will be notified by letter and required to sign a Data Processing/Confidentiality Agreement, which is to be returned to the Individual Benefits and Research Department.
6. In handing over the data to an authorised research team member, NHF will be guided by the Data Protection regulations. All confidential data/information provided by the NHF will be anonymised and where applicable, password protected.
7. The researcher will be required to submit a copy of the research report to NHF at the end of the study.

Additional Requirements

All confidential data/information collected from persons via direct contact or survey must be de-identified by the researcher(s) for analysis and reporting purposes.

- NHF reserves the right to withdraw the approval granted at any point during the conduct of the research if any breaches related to the terms and conditions of the agreement are discovered.

- The NHF is committed to taking steps to safeguard the content of the proposal and shall not disclose any information or a part thereof to anyone not associated with the process.