



Data Sharing Guidelines: Department of AIDS Control



National AIDS Control Organisation

India's voice against AIDS

Department of AIDS Control

Ministry of Health & Family Welfare, Government of India

www.naco.gov.in

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Data Sharing Guidelines:

Background: National AIDS Control Organisation, Department of AIDS Control (DAC) collects data on components related to HIV/AIDS through various mechanisms including routine monitoring, sentinel surveillance systems, Behavioral Surveillance surveys and other evaluations / operations research studies. The main objectives of this information collection through integrated M&E system are to track the progress of HIV/AIDS epidemic in the country and to track performance of National AIDS Control Program.

The data collected through these mechanisms is used for various purposes including program management, resource allocation and taking corrective decisions.

Purpose of Data Sharing Policy: The data collected varies from inventory information to patient disease details. With web-enablement, the data can be made available through internet at all levels and to all partners who are involved. The data transfer is gradually shifting from sequential (RU→District→State→National) transfer to direct web transfer so that information is available to all simultaneously. Adequate measures for data security are in place for restricting access by giving various levels of permission. However, due to stigma associated with HIV/AIDS, maintenance of confidentiality is crucial for security and confidence of HIV patients.

Involvement of large number of organizations ranging from government, semi-government, private, civil society, and many more in fighting against HIV/AIDS and interest and support of large number of donors and stakeholders emphasizes need of transparency and availability of data to all those who are involved in the program related to HIV/AIDS. Post graduate and PhD student/scholar, who want to do research in HIV/AIDS field, also give request for data access. The approaches and implementation strategies being adopted by programme pose several operations research questions and researchers in constant need to add to the existing knowledge or create new knowledge require information. The information needs thus vary according to levels and area of work. Looking at the stigma and discrimination faced by HIV infected person and keeping the confidentiality at forefront, there is need to use this data with utmost caution and maturity. Considering the above, this Guideline has been developed.

Following matrix gives broad guidelines of data sharing:

Type of Information	Level of security	Availability	Approving Authority	Process
Data that can be shared without a review				
Information on location of service facilities (BB, STI Clinic, ART Center, ICTC, F-ICTC, TI etc); Published Reports and documents of studies, evaluations, surveys, surveillance or any other programme activities; National/ State level aggregate data on no. of centres, uptake of services & positivity rates from programme data	Low	On Website; Programme Division of SACS/DAC	Approval not required, if available on website; Approval of concerned HOD, DAC/ PD, SACS, if not available on website	Undertaking not required; No need of intimation to DAC, if data request received at SACS
Data that can be shared after review on case to case basis				
District/ RU level aggregate data on no. of centres, uptake of services & positivity rates from programme data; Disaggregated data (i.e. break up by age, gender, demographic variables, programmatic variables, etc.) at any level	Moderate	Programme Division of SACS/DAC	DAC Data Sharing Committee, with concurrence from concerned HOD	Undertaking required. Request to be forwarded to DAC, if data request received at SACS
Individual level data (Without personal identifier) of beneficiaries of various components under NACP	High	Programme divisions of SACS/DAC; Records of Reporting Unit	Secretary, DAC after review by Data Sharing Committee	Undertaking required. Request to be forwarded to DAC, if data request received at SACS
Individual level data (raw data) from HSS, BSS & other studies/ surveys conducted by DAC;	High	SIMU & Programme Divisions of DAC	Secretary, DAC after review by Data Sharing Committee	Undertaking required. Request to be forwarded to DAC, if data request received at SACS
Information on procurement & utilization of kits, drugs and other consumables etc.	High	Procurement Division, SACS/DAC	Secretary, DAC after review by Data Sharing Committee	Undertaking required. Request to be forwarded to DAC, if data request received at SACS
Financial information – total budget sanctioned under various schemes, utilization rates, etc.	High	Finance Division, SACS/DAC	Secretary, DAC after review by Data Sharing Committee	Undertaking required. Request to be forwarded to DAC, if data request received at SACS
Approval for Publication	High		Secretary, DAC after review by Data Sharing Committee	Undertaking required. Request to be forwarded to DAC, if data request received at SACS
Data that cannot be shared				
Individual level data (With personal identifier) of beneficiaries of various components under NACP	High	Records of service delivery centre		

Key Protocols:

1. For all data collected through National AIDS Control Program(NACP), DAC is the custodian. Data in all forms, the standard tables, reports as well as raw data will be under the custody of DAC.

2. All agencies supporting DAC in data generation through various processes including routine monitoring, surveillance or surveys should handover complete data sets to DAC after completion of the process / reports.
3. Individual, agency, Organisation who data access to the data of the National AIDS Control Programme, have to submit the data request in the prescribed format (Annex-1) with clearly defined purpose and clear details of the data that is required.
4. The applicant will also have to sign an undertaking (Annex-2) with DAC, assuring maintenance of data confidentiality, avoiding conflict of interest, acknowledgement of DAC in the publication & seeking prior permission from DAC before publication.
5. The applicant should submit detailed protocol of the study along with data request form; protocol should give objectives, methods, analysis framework that is proposed to be used in the analysis and implications of the analysis /study for the programme.
6. In order to simplify the procedure for many students who seek data from the programme for their thesis work, the applicants are categorized as below.
 - I. Students seeking data for his/her Graduate/ Post Graduate thesis work
 - II. Doctoral students seeking data for his/her PhD thesis
 - III. All other applicants, other than students
7. If the applicant is seeking data for his/her Graduate/ Post Graduate thesis,
 - I. If the data required (accessing available data/generating fresh data through interviews of beneficiaries) is limited to one or two reporting units/ centres, the student can collect the data from the centre subject to following conditions.
 - i. He/ she should have obtained necessary ethical clearance from his/ her institutional review board, for the thesis.
 - ii. He/ she should obtain permission from the in-charge of the Reporting Unit/ Centre.
 - iii. He/ she should intimate SACS & DAC about the study before starting data collection.
 - iv. He/ she should seek permission from DAC before publishing any report or paper using data under National AIDS Control Programme.

In this case, it is also the duty of In-charge of the RU/ centre to inform SACS & DAC about such study along with details of the student and the data being accessed.

- II. If the data required relates to district or higher level (either aggregate data or individual data) that is collected through CMIS/SIMS or any other data collection /reporting mechanism under NACP, the student should

approach SACS/DAC with data request. In such a case, the protocol as given in table above will be followed.

8. If the applicant is seeking data for his/her PhD thesis, he/she should approach SACS/DAC with data request, irrespective of which level of data he/she is seeking (facility level/district /state /national). In such a case, the protocol as given in table above will be followed.
9. All other applicants should also approach SACS/ DAC with data request for obtaining any data from NACP.
10. All the data requests will be examined by M&E Division at DAC and depending on the category of data requested, it will be referred either to concerned HOD or Data Sharing Committee of DAC, for their review, as per the protocol given in the table above.
11. Data sharing committee shall review the data requests based on the following criteria, give its recommendations and submit for approval of Secretary, DAC.
 - I. Whether the topic for analysis/ publication is in line with the priorities for analysis & research of DAC
 - II. Whether there are any adverse programmatic implications from the analysis/ publication of analytic findings
 - III. Any possible conflict of interest situation with the applicant, due to his/ her organizational or institutional affiliation
 - IV. Whether the applicant has obtained the necessary clearances from required Institutional Review Boards/ Ethics Committees
12. Personal information will be filtered to conceal identity of individuals from any raw data which is to be shared.
13. Data will be shared with the applicant only after the approval of Secretary, DAC. Instructions will be given to concerned programme division of DAC/SACS to provide the information.

Format for Data Request

1. Name of the Individual/Institute/Agency Requesting Data:

2. Purpose :

- a. Planning new programme
- b. Program management / evaluation
- c. Research
- d. Publications
- e. Others (Please specify) _____

3. Whether protocol of the study is enclosed : Yes / No

4. Details of data use (Explain how the requested data would be used):

5. Define the data requirement

- a. Component on which information required
- b. Geographical area
- c. Time period
- d. Level of data –Aggregate or individual level
- e. Indicators/Variables required
- f. Any disaggregation required

Date:

Sign:

Name & Designation:

Institution:

UNDERTAKING

I/We,

.....
..... (Name), working as (Designation)
in

..... (Complete Name and
Address of Institution/ Organisation), am/are involved in the study/analysis titled
“
.....
.....” from
..... to(time period).

I hereby declare that the data that I am provided access to, under the above-mentioned study/ analysis will be used only for the purpose of the work mentioned hereinabove and only in the manner that Dept. of AIDS Control (DAC) authorizes and permits. I expressly acknowledge and agree that without prejudice to the all available legal remedies, I am also liable to administrative action in case the data is used for any purpose beyond the scope of this study. I will not share the data with any one, or publish the research data without prior written consent/permission from DAC and shall maintain the confidentiality of all Confidential Information. I shall submit a copy of all the data files, analysis papers and reports generated as a part of this research to DAC at the end of the study/analysis. I will acknowledge Department of AIDS Control in all the publications that come out of this analysis/study.

.....
(Signature)

Date: Place:

Contact Details:
Mobile & Telephone:-
Email:-

.....
(Signature of the Head of Institution/Organisation)

Name of the Head of Institution/Organisation:
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Date: Place: Official Seal: