

University of St Andrews - School of Medicine Handbook
SCHOOL OF MEDICINE DATA MANAGEMENT POLICY 2015 / 16

This note summarises the University policy as it applies to the School of Medicine.

1. In Medicine this is sub-categorised as follows:
 - a. **Cat 1.** Facts about students¹ and notes made about them².
 - b. **Cat 2.** Admissions data³.
 - c. **Cat 3A.** Video / audio files captured by staff for learning and teaching purposes.
 - d. **Cat 3B.** Video / audio files captured by students for learning and reflection purposes.
 - e. **Cat 4A.** Video / audio files captured by examiners in order to grade performance.
 - f. **Cat 4B.** Written assessment material; transcripts.
 - g. **Cat 5.** Lecture- Capture video, audio and slide files.
 - h. **Cat 6.** Body bequest data.
 - i. **Cat 7.** Research data, including MD4002 data.
 - j. **Cat 8.** Data relating to (real) patients conditions and histories
2. **Data Protection Model.** In general terms:
 - a. The school follows the University Data Statement.
 - b. The School uses data in novel and expansive ways in order to deliver the School's unique curriculum. Applicants should be made aware of the school's data processing methods in order that they are fully appraised of the use of personal data that completion of the BSc (Hons) requires.
 - c. Warning notices alert or remind staff and students of the specific video and audio capture devices in use; where they are, how they work and what happens to the product.
 - d. Some individuals are required to sign function-specific forms to acknowledge advice.
 - e. User guides inform users on how to operate data capture systems.

¹ Names, addresses, email addresses, phone numbers, exam scores, class ranking, route choices, attendance records.

² Notes taken by Tutors, progress boards etc, relating to disciplinary or professionalism issues and FtP

³ UK CAT scores, school grades, previous degree scores, interview scores etc

3. **Key Data-Related Publications.** These are:

Responsibilities	Medical School Agreement	UG students overarching consent regarding data protection
Warning notices	Video Capture Poster (Clinical Skills)	To advise on the security implications of the video capture system in clinical skills / MRC
	CCTV poster (Tutorial and Interview Rooms)	to advise all users of the implications of the networked camera system
	CCTV warning signs (main entrances to building)	To advise all users that there are CCTV systems operating.
Acknowledgment forms	DP40	UG students consent to transfer data
	OH12	UG students consent to transfer occupational health records
	Clinical Data Confidentiality Agreement	For all students with exposure to clinical data
	DP consent form 'occasional' SPs	
	Data protection form 'professional' SPs	
User guides	Lecture Echo – user guide	
	Clinical Skills video capture system – user guide	

CAT 1 - UNDERGRADUATE PERSONAL CONTACT DATA

4. **Data.** This category of data includes:

- a. Email and postal address listed in the student portal. To allow staff in this school and the partner medical school to contact students.
- b. Mobile phone numbers⁴. To allow quality assurance of placements via text
- c. Academic performance results. To generate class ranking and allow partner medical schools rank students and then monitor performance after joining.
- d. Information relating to student disciplinary matters, including Fitness to Practice.
- e. QA data relating to placements. Feedback from placements to inform NHS managers.

5. **Bulk emailing.** Bulk emails will not be available to students. Students who wish to email the whole class or school should send an email to the school secretaries who will forward it on. This email may request that individuals supply their email address to a fellow student but should not compel them to do so.

6. **Retention.** UG student data will not normally be retained longer than 3 years after the student has graduated.

CAT 2 – ADMISSIONS DATA

7. UK Clinical Aptitude Test results and school grades. To compare academic performance to entry levels for the purposes of UKCAT research to assess the continuing fairness and accuracy of the test as an instrument to support admissions decisions. The Medical School has entered into an agreement with UKCAT regarding provision of student performance data. Details regarding use of the data are included in the Data Privacy Statement.

⁴ It is not mandatory for students to submit their mobile 'phone number. These are used to generate feedback from placements via texts but staff may use the system to contact a student in emergency or to send bulk emails, such as the closure of the school due to adverse weather.

CAT 3 - VIDEO FILES FOR LEARNING, TEACHING OR REFLECTION PURPOSES

8. **Ethical Approval.** University ethics committee approved this activity on 15 Dec 11. Reference MD8281 refers.
9. **Definition.** Cat 3 data comprises video files (containing video and audio) with associated metadata relating to the data subjects captured, location, notes and time of the film. Cat 3 data is captured from cameras located in the Clinical Skills rooms, the MRC, the Sim Man rooms, the seminar rooms, the tutorial rooms, the interview rooms, and from mobile cameras. The metadata is captured at time of recording, and can also be modified later by authorised persons.
10. **Purpose.** The purpose of these captured videos is to support students learning during teaching scenarios and to encourage self-assessment and critical appraisal of performance. Videos have an important role in student feedback.
11. **Sensitivity.** The content of a MedVu file may be sensitive:
 - a. The clinical skills video capture system is designed to support the teaching and assessment of both communication and clinical skills. The system captures the student learning process of acquiring competency of clinical skills and encourages self- assessment and critical appraisal of their own and others performance. As such these are private and sensitive videos and as such are securely and privately stored
 - b. The performance of some clinical skills can require the simulated patient⁵ to be partially clothed. Students must treat all simulated patients with respect both during the practising and filming of the skill and when viewing the video. There is no requirement for simulated patients to remove their bras for a video. Care should be taken in relation to the environment where these videos are watched if a simulated patient is involved.
12. **Storage of Data.** The video files are stored on a SAN storage system located in the MBSB server room. The metadata associated with each video is stored on the University Oracle. The databases are called Galive and Gatest. Data may be backed up for disaster recovery purposes onto whatever systems are currently employed for that purpose. Access to backed up data is only available for disaster recovery purposes by the system administrators in charge of those systems
13. **Protection of Data.** Cat 3 data is protected by Windows and Linux system passwords. A password attempt can only be made by a user accessing the server locally in the server room, from within the wired university network (or VPN to this network) or from university wireless network (Eduroam or resnet). Access to the server room is swipe controlled and available to a limited number of support staff.
14. **Data Back-up.** Cat 3 data will not be backed up.
15. **Access to Data:**
 - a. The videos can be viewed from the bedside touchscreens using the client based software (Milestone) or more likely viewed from the web client (MedVu). The videos can be viewed on campus from any wired PC and through the wireless network Eduroam. They can be viewed from the residences (RESNET). This will allow access from other Educational institutions which have Eduroam access. Off campus access is only via VPN access.
 - b. Access to the videos is restricted to staff and students according to the user control protocols allocated at time of capture. These are summarised as follows:
 - i. Director. The person that sets up the capture session.

⁵ The Simulated patient may be a 'professional, that is contracted to the school, another medical student or a student of any other discipline

- ii. Cast member. One or more students that were captured in the video.
 - iii. Audience member. One or more users that have been given permission by a director or a cast member to view the video. Audience members can only be added to videos where there is only one cast member.
 - iv. System administrator. With direct access to the server and files on the server.
- c. Every video is visible by a systems administrator. Videos can have 1 director only but any number of cast or audience member. The director controls access through cast and audience access.
- d. System Administrators working within the School of Medicine and the University IT Services have access to the data as required to perform their duties. Access and use of the data by System Administrators for any other purpose is forbidden.
- e. Developers working within the School of Medicine, the University of St Andrews, or contracted to work for either, may occasionally require access to the data as required to perform their duties. This access will be controlled by the system administrator. Access and use of the data by Developers for any other purpose is forbidden.

16. **User Access.** User access is managed by the user's University SunID and their role in the Galen database, and authenticated against the University AD domain. Each video may contain personal data from one or more Data Subjects (i.e. if more than one person is present in the video). These Data Subjects may be students, staff or simulated patients.

17. **Deletion of Cat 3 Data:**

- a. **By time.** All Cat 3 data will be deleted from the server in mid-September of the year in which they have graduated from St Andrews. From this point on the video files will be unavailable to staff and students alike. Cat 3A videos featuring multiple cast members will be deleted when the last cast member has graduated.
- b. **Elective.** A Cat 3B video of student who is the sole cast member and who deletes themselves as a cast member becomes an orphan video and this is deleted monthly.
- c. **Capacity.** Students should be allocated a maximum number of Cat 3B videos during their UG years. Students who retain too many videos will be emailed and invited to delete excess videos. If students fail to respond to a reminder to delete excess videos then then the system administrator will be allowed to delete the videos on their behalf.

18. **Acknowledgment of Consent:**

- a. **Medical Students as cast member.** By signing the Medical School Agreement students confirm that they; 'are willing for my performances in clinical and communication skills to be recorded and stored for teaching and assessment purposes.' Where a Student appears in a video, their name will be recorded in the metadata (as a cast member).
- b. **Professional Simulated patients⁶.** Consent is obtained through the SP contract agreement. The appearance of a particular simulated patient in a video is not recorded in the metadata.
- c. **Ad hoc simulated patients.** Friends and other students willing to act as simulated patients must sign a consent form to be videoed.

⁶ That is Simulated Patients contracted for that purpose by the School
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d. **Staff.** It is assumed that all staff consent to being captured. All staff should be aware that they might unwittingly be captured in a student's video. No written consent is required from staff. The appearance of a particular staff member in a video may or may not be recorded in the metadata, depending as to whether they were the main subject of a video or just an incidental person.

e. **Volunteer patients.** VPs will not be recorded under any circumstances.

19. **Withdrawing or withholding consent:**

a. Any student who has signed the Medical School agreement has agreed to being videoed as part of teaching and assessment. A student cannot opt out at time of teaching or an exam. Any student concerned with this policy should speak to the Pro Deans.

b. **Ad hoc Simulated patients.** Ad hoc simulated patients give consent on a case by case basis. Any SP who subsequently decides that they wish a video in which they have appeared as a SP to be deleted must make their case, in writing, to the Learning Technology Team – noting the date and time of the video and the name of the cast member concerned.

20. **Viewing and sharing.** Students must not attempt to make unsecured copies of their own or other persons clinical skills practice, either through downloading, file sharing or capturing on a secondary device. Such an event would be regarded as a Fitness to Practise concern. Videos will only be live streamed to university wired PCs and wireless systems connected to Eduroam / resnet. Access to individual videos via the web interface (MedVu) is granted to users according to their inclusion in the metadata:

- a. the user is recorded as the 'director' (always a staff login ID)
- b. the user is recorded as being a 'cast member'
- c. the user is recorded as being an 'audience member'.

21. To make a user an audience member, the video must be 'shared' with them. i.e. 'Sharing' allows them to see the video even if they are not in the video. A video can be shared with other users by the cast member, but only if they are the sole cast member.

22. The 'director' of a video (who is always a staff login ID) can modify the 'cast members' and the 'audience members.'

23. **Subsequent sharing.** Staff wishing to use a video of students as an example in future teaching scenarios should obtain and hold written consent to use the video from the students in the video concerned. This permission should be retained by the staff member. This is managed through the group sharing option in MedVu which clearly states how each video is shared.

24. **Camera management.** The cameras have a red light beside them. If the red light is on then power is on and the cameras is in CCTV mode, that is images are being created but are not held or recorded. If the red light is flashing then the camera is recording to a database.

CAT 4 DATA – Assessment Data

25. **Definition.** Assessment data is:

- a. The questions as set to a student(s).
- b. The marking guide associated with that question.

- c. The student's attempt at answering the question, which may be:
 - i. A short written answer amounting to sentences of text.
 - ii. An EMQ or MCQ where one or a combination of boxes is ticked.
 - iii. A dissertation.
 - iv. An observation or record made about a display of practical skills or knowledge.
 - v. Notes taken on a verbal presentation (Viva)
- d. The mark awarded for that answer.
- e. Cumulative marks compiled from numerous answers and papers and the grades that are associated with the marks.
- f. Degree award, rankings etc that are obtained from the class marks.

26. **Exclusions.** Assessment data does not include banks of possible questions or policy. Formative questions set to provide students experience are not assessment data, it follows that formative questions are not pulled from the bank of actual questions.

27. **Recording.** Data is recorded in the following ways:

- a. Scripts written or typed by the student.
- b. MCQ / EMQ sheets.
- c. Examiners notes.
- d. Video of practical skills.

28. **Purpose.** The purpose of capturing this data is to allow assessment of students' performance.

29. **Disclosure.** To be transparent and fair to all student and to comply with FoI legislation:

- a. School regulations permit students to:
 - i. Examine Short Written Answer scripts under supervision of a tutor. These are not to be released to students or copies made.
 - ii. Keep a printed copy of their dissertation.
- b. Students are not permitted to:
 - i. Copy exam scripts⁷
 - ii. See or copy Speedwell marking sheets⁸

⁷ To do so would compromise these questions and therefore be unfair to future students. There are only a finite number of possible questions so re-writing compromised questions is not practical or economical.

⁸ These are meaningless tick boxes without the question and marking guide.

30. **Protection of Data:**

- a. **Paper copy.** Kept under lock and key.
- b. **Electronic data.** Kept on secure servers under password protection.

31. **Electronic Data back-up.** As per IT protocols.

32. **Retention of data:**

- a. **Scripts.** Held locally for the academic year, held in archive for 3 years after graduation.
- b. **Videos.** Videos captured as part of an OSCE summative exam should be retained in accordance with the University regulations on the retention of exam scripts. This is 3 years post-graduation from the University of St Andrews. These can be archived and used if required for any fitness to practice issues.

CAT 5 DATA – LECTURE CAPTURE

33. Stand-alone policy covering use of the system and data protection issues.

CAT 6 DATA

34. http://medicine.st-andrews.ac.uk/documents/handbooks/001_08_03_01.pdf Info held separately.

CAT 7 DATA

35. All video capture for research purposes, including MD4002, should have ethics approval.

CAT 8

36. Student notes on VPs are to be anonymised and relate only to the patient's condition.