GDPR Review Process for Tufts University Researchers

**PI**
- PI approaches Local Research Administrator (LRA) to discuss starting a research project
- PI begins developing research project approach

**LRA**
- LRA directs PI to GDPR FAQs and GDPR Qualtrics questionnaire
- After PI completes GDPR Qualtrics questionnaire, LRA reviews PI’s answers from Qualtrics to consider whether GDPR might apply
- LRA initiates discussion with PI on how to avoid or limit scope for GDPR (if needed) and can involve OVPR (Research Compliance or Pre-Award) to assist

**LRA/PI**
- LRA & PI approach OVPR Research Compliance or RAD Pre-Award about next steps in process
- LRA & PI raise any questions to OVPR Research Compliance, RAD Pre-Award (at proposal stage), and/or IRB staff (during protocol preparation and project period) about compliance

**OVPR Res. Compl.**
- At proposal stage, reviews proposal for GDPR and must indicate if GDPR is in/out of scope
- If in scope, gives PI GDPR templates & materials, and helps compile GDPR notice and other materials for protocol preparation and conduct of project
- Indicates for the IRB Committee (If required) if approach appears to be GDPR compliant
  - -- If complicated or edge case, OVPR raises questions to GDPR and Research Review Committee

**IRB Comm.**
- If IRB is required:
  - IRB Committee looks at submission to ensure GDPR review occurred and OVPR Research Compliance has indicated PI approach appears to be prepared for GDPR compliance
  - If issues research submission circles back to PI

*Last Updated: 24 April 2019*