EHDS CHECKLIST

Seven steps between a data request and a delivered dataset

STEP	WHAT HAPPENS	SYSTEMS TOUCHED	WHO OWNS IT	REPEATS PER DATA REQUEST
1	**Read the data request.** Scope, variables and the deadline arrive from your national Health Data Access Body.	HDAB portal	Data office	Yes
2	**Find the data.** Locate every requested variable across the systems that hold it, and work out how each was derived.	EHR, lab, imaging, registries, trial systems	Data office, IT	**Yes, unless mapped once**
3	**Cut to what's approved.** Keep only the named variables. Remove opted-out patients and protected IP.	Opt-out register, data warehouse	DPO, data office	Yes
4	**Reshape and code it.** Convert to the format the data request names and map local codes to standard vocabularies.	EHR, lab, imaging, registries	Clinical informatics, IT	**Yes, unless mapped once**
5	**Anonymise or pseudonymise.** Anonymised is the default. Under current draft guidance, the HDAB re-pseudonymises when pseudonymised data is approved.	Data warehouse	DPO, HDAB	Yes
6	**Deliver and keep proof.** Transfer to the HDAB within three months and keep a record of what left and when.	HDAB portal, compliance system	IT	Yes
7	**Claim your costs.** Estimate your preparation costs so they are compensated through the HDAB fee.	Finance system	Finance	Yes

Where the time goes

Steps 2 and 4 carry most of the effort. They only repeat on every data request when nothing is mapped once.

Based on Regulation (EU) 2025/327 (EHDS) and current draft guidance. Not legal advice.

Rhino
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Calculate what redoing the work will cost you:
rhinofcp.com/ehds-first-data-request/#calculator