Researcher management and breaches policy

Safe People

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Before we start

- The Health Foundation's secure environment is used by members of two in-house teams

- I completely agree with Felix, researchers and analyst can make or break your secure environment

- One of the first slides any THF analyst will see…

Trust

Trust is the most important control!

- Data controllers trust the Health Foundation

- The Health Foundation trusts us

- We need to trust each other

No blind trust!

Building trust

Protect researchers

-   Show researchers and analyst that good Information Governance protects them as much as it protects data subjects

-   Explain what controls are in place and why
    -   We use the 5 Safes framework for that

-   If controls don't work for users, change them
    -   No need to sit and wait for them to find a work-around

-   Continuous improvement

Work together

- Work WITH the researcher at all stages of the process
  - Data application
  - Data preparation
  - Data analysis
  - Disclosure control

- Don't tell researchers 'NO' without explaining why.

Include researchers in Information Governance

Joined thinking

By involving researchers in the development of policies and procedures, they gain a better understanding, and become 'Safer' people

○ The Information Security Manager is also a researchers

○ Both teams have researchers as Information Security Marshalls

○ Our ISMG has members from across the organisation, including researchers

Approved Researchers

- All researchers to complete Information Security Induction Training

- All researchers to complete the UKDS, HMRC, ONS and ADRN joined accreditation training
  - James and Mark

- Formal paperwork
  - Non-disclosure agreement
  - Terms of Use

Carrot and stick

- Being able to access data through a RDC is a big carrot
    - Make sure users are aware of that!

- The carrot should be bigger than the stick!
    - Secure data should add value
    - Innovative research
    - New data sources

- How big is the stick?

Breaches policy

Security Events vs Incidents

- Breach of procedure → Security event
  - e.g. risk of disclosure, but no breach of confidentiality

- Breach of legislation or DSA → Security incident

- Security events are GOOD!
  - Opportunity to improve
  - Opportunity to re-train

Penalties

- Official warning
- Temporary suspension
- Permanent suspension

- Temporary suspension of institution
- Permanent suspension of institution

- Withdrawal of a researcher's funding
- Withdrawal of an institution's funding

There is always, jail time

In-house perspective

- **O** Much more difficult

- **O** By suspending a researcher
  - **O** Add to workload of colleagues
  - **O** Harm work of the foundation
  - **O** Difficult atmosphere at work

- **O** Don't go easy on the researchers

- **O** Early warning systems!
  - **O** Re-training

Conclusion

- Include researchers in Information Governance

- Work with the researchers to achieve the goals of a project

- Trust researchers

- Build your own trust!

Security incidents are rare!

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