

Harvard Research Data Security Policy and Process

Summary of Changes | February 2020

The Office of the Vice Provost for Research (OVPR) and Harvard University Information Technology (HUIT) gathered feedback on the processes described in the Harvard Research Data Security Policy (HRDSP). The results of review are the development of a new Data Safety and Security Application to support the review of research data security and management plans and a revised HRDSP.

New Data Safety and Security Application

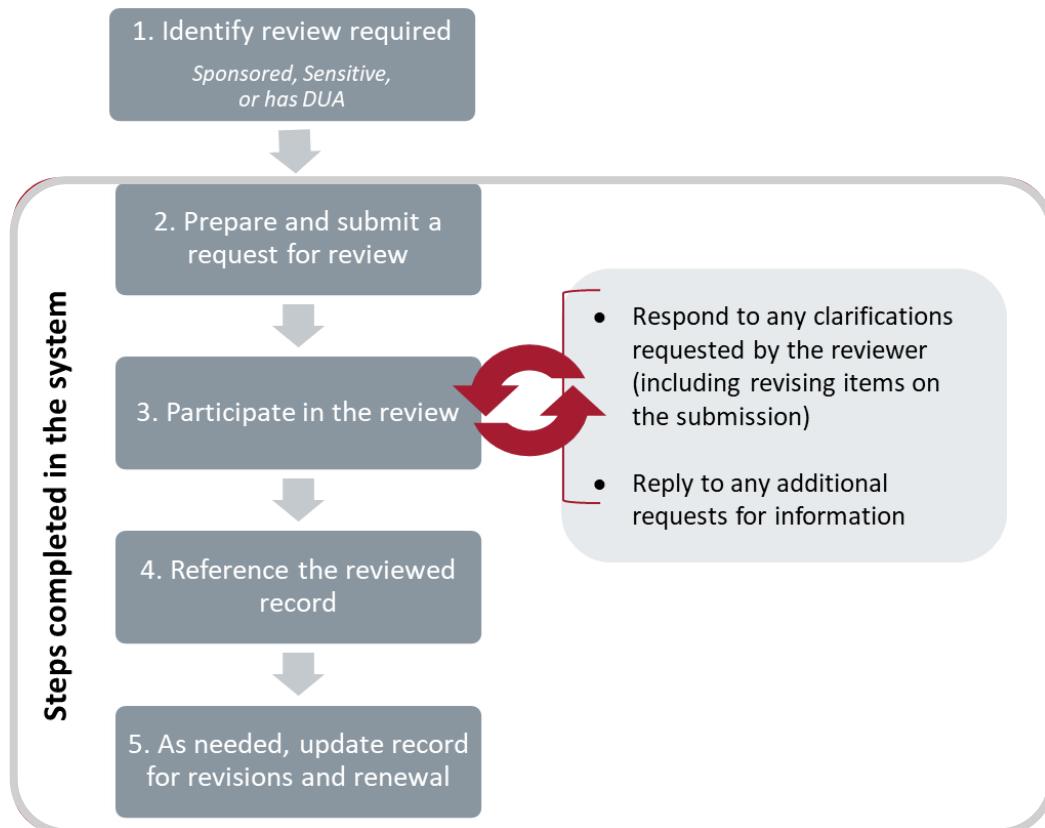
The new application will support the research data management and security plan review process by providing:

- Consistent and transparent expectations regarding the content and status of review;
- Tracking, reporting and real-time updates for data safety and security requests and data management plans;
- Ability to link projects and datasets to submissions in other applications;
- Enhanced capacity to communicate throughout the review process; and
- Automated reminder notifications associated with compliance activities.



The revised HRDSP will go into effect on July 15, 2020. At that time, use of the Data Safety application will be required for all data security reviews.

Basic Data Safety Review Process



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Revised HRDSP

The revised HRDSP increases consistency between Harvard's data-related policies, and updates the underlying roles, responsibilities, and processes to:

- Eliminate review barriers,
- Address any potential policy or process gaps, and
- Reflect the current realities of managing research data at Harvard.

The updated format separates the higher-level Policy statement from the more granular guidance to allow for greater flexibility to respond to changes in the data landscape. Largely, the revisions are consistent with existing processes, below are descriptions of proposed key changes from current practice.

Key Changes	Anticipated Benefits
<p>IRB Data Security Level (DSL) Determination Changes</p> <p>Rather than a DSL determination, IRBs will make a non-sensitive or sensitive determination about the data, where:</p> <ul style="list-style-type: none">• Non-sensitive: Data security review is not required, the data are categorized no higher than DSL 2, and should be managed under at least DSL 2 requirements.• Sensitive: Data security review is required, the data are categorized as DSL 3 or higher, and a School Security Officer (SSO) must review data management measures.	<ul style="list-style-type: none">• Ability to individually initiate SSO review, without waiting for IRB or Agreements review.• SSO involved earlier in determination of the level of technology/process required to mitigate risk.
<p>Continuing Review and Amendment Requirement</p> <p>After initial approval, review must be updated annually until data are ready for archiving. On active records, any changes to the approved plan or data access must be proposed for review and approval.</p>	<ul style="list-style-type: none">• More easily communicate with SSOs and other technology services providers to streamline updates.• Receive helpful system reminders when review must be updated based on Data Use Agreement requirements, where applicable.
<p>Annual Training Requirement</p> <p>Researchers who work with data will be required to complete annual Research Data Security Training and maintain an active certificate of approval to continue utilizing Harvard's resources.</p>	<ul style="list-style-type: none">• Easy access to basic principles of data management for researchers and teams.• Acceptance of a variety of training options (inside and outside the University).
<p>Additional Review of Sponsored Research</p> <p>Data associated with a sponsored project for which Harvard is the prime recipient or the sponsor applies specific requirements (including policy or regulation) to the management of the data.</p>	<ul style="list-style-type: none">• Opportunity for security review to occur early in the research planning process.• Support for review of activities across performance sites.• Increased access to sponsor/project-specific guidance and Data Management Plan templates.

Contact and Reference

- *Data Safety System:* researchsafety.harvard.edu
- *Data Safety Support Site:* <https://ras.fss.harvard.edu/data-safety>
- *Data Safety System Help Desk:* rshelp@harvard.edu
- *Office of the Vice Provost for Research:* <https://vpr.harvard.edu/pages/harvard-research-data-security-policy>
- *Research Data Management at Harvard:* <https://researchdatamanagement.harvard.edu/>