Intra-Institutional Partnerships for Research Data Security and Compliance

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Motivating Observation

• RDS&C is a complicated problem
  • not a Researcher problem
  • not a Research Administration problem
  • not an IT Security problem
  • not a Research IT problem
  • not a Local IT problem
  • not a Research Compliance problem
• RDS&C is a partnership of all of the above
What is a partnership?

• Ideally...
  • Shared vision, shared processes, shared workflow tools
• But at least...
  • Know one another exist
  • Know what one another do for a living
  • Tell one another what information you need
  • Understand the implications of your decisions for others
  • Check in with one another regularly
  • Have meetings to improve communications
Terms and Conditions

• The Terms and Conditions surrounding the data are the starting point for everything
• Research Administrators (Contract Negotiators) are the #1 most critical partner
• Every contractual term can imply a security requirement
• Every security requirement can imply a compliance requirement over time
• Your duty and responsibility is to educate the T&C folks about the practical impacts of their agreements
Three Years Ago

• Our contract negotiators...
  • had no idea what IT/RC units and services existed
  • had no idea what our IT/RC people could or could not do
  • had no idea what they were practically agreeing to

• Which meant that research compliance...
  • had no idea if we were compliant or not
  • because there was no actual list of technical requirements
  • and if there had been, there was no one qualified to
determine if the requirements were being met
Also Three Years Ago

• Our IT/RC people, on the other hand...
  • had no defined means of working with one another
  • didn’t know what one another could do
  • didn’t trust one another
  • had no idea that contract negotiators existed
  • had no means of translating Ts&Cs into actionable technical requirements
  • were reactively addressing everything on an ad hoc basis
  • were doing what they thought ought to be done, instead of doing what the contracts called for
What We Did

- We held meetings
- We introduced ourselves to one another
- We talked about what we do for a living
- We started sending emails back and forth
- We built mutual understanding and trust
- We agreed on minor process improvements
- We agreed to keep talking and improving
- We slowly started formalizing things
- We started sketching plans for a more formal future
- Which led to where we are now...
Where We Are Now

• Have a formal process for translating Ts&Cs into actionable technical requirements
• Have a formal process for making sure all the partners are aware of the technical requirements
• Have a formal process for making sure the technical requirements are in place prior to data acquisition
• Hired a technically proficient person to work in Research Compliance
• Have a formal process for annual compliance checks
Questions?

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