Revised Digital Data Storage and Backup Policy

- Public Comment
- Multiple Revisions by working group –
  - ITS staff
  - IRB Chairs
  - Privacy Officer
  - ORSPA and IRB staff
- Three focus groups – faculty and staff
- Final draft

Revised Digital Data Storage and Backup Policy

- Major revisions

  - Public comments
    - Encryption
    - Identified data
    - One Drive use
    - Flash drives

  - Focus groups
    - Clarify definitions
    - One Drive use
    - Coded data

  - New format – policy and procedures
  - Flow Diagram

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- Policy clarifies and greatly simplifies procedures:

  - Data management plans in grant applications will be more robust
  - Faculty, staff, and particularly students conducting research, have enterprise level support for research data backup
  - Researchers have enterprise options for data access from distant locations and for data sharing with external collaborators

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Recent Incident – Relevance of new policy

- ETSU researcher stored individually identifiable data on a password-protected external hard drive
- Hard drive stolen from their office
- Data was not backed up – completely lost
- Legal and ethical concerns with regards to the privacy and rights of the participants
- IRB determined that ethically, participants should be notified that the hard drive lost contained their information

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Recent Implementation of New EU General Data Protection Regulation (GDPR) – relevance of Data Storage Policy

- Covers research data, including storage and processing incorporating EU data sets
- Covers all personal data – any information relating to an identified or identifiable natural person (name, identification number, location data, online identifiers such as IP addresses and images.
- Significant fines for breach – 20M euros

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