Information Asset Owner (IAO) for Division of Population Health projects

This version (V2.1) approved by the IG Committee 2023-09-26

The <u>Division of Population Health Information Governance Lead</u> is responsible for data security and protection within the Division of Population Health. The Information Asset Owner is accountable to the Division of Population Health Information Governance Lead for managing the risks associated with handling risk-bearing information.

The IAO is responsible for the information they control. This is at a local level, e.g. within a study, typically the Principal Investigator (PI) defining how research data is managed/processed for their specific project. The IAO must be a Division of Population Health employee, not an Honorary member of staff or student.

The IAO is responsible for ensuring that information processing adheres to relevant policies and procedures (UoS, Division of Population Health, and any special constraints, e.g. those demanded by the funder or data provider). The IAO may delegate to other members of the study team specific actions and tasks associated with these responsibilities, but the responsibilities themselves ultimately remain with the IAO. If the PI is not a member of the Division of Population Health then a Division of Population Health staff member closely involved with the project will be the IAO.

Responsibilities of the Information Asset Owner

The Information Asset Owner must ensure:

- Data for which they are responsible is stored in accordance with the agreements under which it has been provided, and all relevant Contractual requirements are met. (See also the <u>Process for projects using the Data Security and Protection Toolkit</u> (<u>DSPT</u>) as the security assurance if any project documentation relies on the DSPT as the security assurance.).
- Data sharing agreements (DSA) (if applicable) are signed by a member of the contracts team in research services (<u>ri-contracts@sheffield.ac.uk</u>).
- Unless otherwise specified, data are stored in an access controlled folder on Division of Population Health's departmental storage (X: drive) which will be managed by the IAO and Division of Population Health DS, or on the Secure Data Service (SDS).
- There is a legal basis for holding personal data.
- All onward sharing of data is legal.
- Appropriate data processing contracts are in place where external parties are processing personal data on behalf of UoS.
- A data management plan (DMP), where appropriate, has been created and is implemented which covers the above points.

- Access is only granted to authorised users and **access is removed** for movers and leavers (for leavers the leavers checklist will be followed).
- Any requests for information regarding data and access are responded to promptly (e.g. emails from Division of Population Health IG, Division of Population Health DS or IT Services colleagues regarding the management and administration of data, asset registers and folders for which the IAO is responsible).
- Any requests from Division of Population Health-IG for information related to the asset register are responded to promptly (e.g. requests for copies of DSAs, data flows, DMPs; details of where data is stored, who has access; details of their training; details regarding use of mobile devices and details relevant to IT Services Computing).
- A new IAO is nominated should they leave the Division of Population Health or otherwise seek to relinquish the "IAO" role.
- The data / folder is deleted or archived when no longer required.
- They have read the Division of Population Health information Governance policy and maintain their <u>Information Security training</u>.
- They comply with all aspects of the Division of Population Health IG policy.
- Incidents are reported promptly.
- A Privacy Notice is in place where required.
- Subject Access Requests are handled in accordance with University guidance.

In addition, the IAO should ensure that all members of the study team understand their responsibilities. In particular, team members must receive <u>Information Security training</u> before being given access to personal data. See also the <u>Process for the management of</u> <u>Division of Population Health resources on the University shared filestore</u> and, where applicable the Process for the management of Division of Population Health resources on the SDS.

Adapted from

Information Asset Owner ('Owner') | Information Services Division - UCL – University College London

Version	Effective Date	Summary of changes
1.0	25-May-2021	n/a first version
2.0	24-Jan-2022	Updated to apply to all ScHARR projects not just DSPT assured projects. Also to include DSH
2.1	26-Sept-2023	Update to clarify the IAO is a member of the Division of Population Health staff. The process for projects using the DSPT as security assurance referenced. DSH is now SDS. Added option to delegate responsibilities.