Routine maintenance of Division of Population Health resources on University Departmental Storage (typically mapped as the "X: drive") v2.1

Approved at IG Committee Meeting 2024-07-22

Overview

In order to ensure the Division of Population Health resources on University Departmental Storage are being appropriately managed, and Information Asset Owners (IAOs) are fulfilling their obligations, routine checks are carried out by the Division of Population Health Data Security Team (Population Health DS). Routine checking is important to ensure access is kept up to date; data in folders is appropriately archived and deleted; and responsibility and ownership is maintained for University data assets.

Process

Selecting a folder for checking

A folder check is generally triggered by a change request, logging of an incident, or users with expired training, i.e. the following would likely trigger a folder access check:

- A change of IAO
- Significant changes to structure or access
- The folder has an 'external' user with expired training (to determine if access is still required)
- A specific request (e.g. from IG Committee)
- Suspicion that folder isn't being managed very well (e.g. an incident has been logged)
- More than 10 years have elapsed since folder creation (where it is possible to work through this list)

Carrying out the folder check

- Population Health DS sends the information about the folder to the IAO via email, with any relevant additional details or requests. The IAO is asked to respond to the email as appropriate, depending on the nature of the check. See <u>Appendix A:</u> <u>Example first email</u>
- If there is no response after one week, Population Health DS will send a follow-up email as a reminder. See <u>Appendix B: Example second email</u>
- If there is no response after a further week, Population Health DS will send a second follow-up email with a reminder that folder checks are an audit requirement, cc'ing in

any Deputy IAOs, and reiterating the specific information required. See <u>Appendix C:</u> <u>Example third email</u>

- Finally, if there is still no response one week later (i.e. over a month after the initial email), Population Health DS will
 - \circ $\,$ remove access for users with expired training records as a precautionary measure
 - raise an IG incident
 - email the IAOs. See <u>Appendix D: Example final email</u>

Appendix A: Example first email

This is a routine folder check for [folder name]

I've listed the folder details for you below.

Could you respond to each of these points, please?

[Numbered list containing some or all of the following, as applicable]

- 1. Do we have all the details correct?
- 2. Do the people who have access still need access?
- 3. Please provide an estimated expiry date. This will flag up the folder for review, and should take into account any data sharing agreements or other contractual obligations. Note that we'll always contact you before we delete or archive anything.
- 4. Please provide a short description for the folder
- 5. Can you confirm if any of the control folders contain risk-bearing data? Any users who do not have up-to-date Information Security training records will be contacted individually, but if they have access to risk-bearing data then we'll need to temporarily put their access on hold until they're back up-to-date.
- 6. You don't have access to all of the control folders that's not a problem, but you need to be aware that as the IAO you are still responsible for them. If you need access, please let us know.
- 7. The xxx control folder does not have any users with access.
- 8. We have a review date of <xxx>, which has now passed. Could you take a look at the folder and either give us a new date for review, or authorise us to delete or archive the folder, please? If you need to know more about those processes, please let me know.

Folder details:

Folder Number: X0000A Folder Name: [e.g. PR_xxxxx] Area: [e.g. ScHARR] Filepath: [e.g. X:\ScHARR\PR_xxxxx] Description: xxxxxx

Responsibility

Information Asset Owner: [username - name] Deputy IAO 1: [username - name] Deputy IAO 2: [username - name] Deputy IAO 3: [username - name]

Status

Status: (Active / Deleted / Archived etc) Expiry: [date] Created: [job ref] Check: [job ref(s)]

Control Folders

Control Folder 1: xxxxxx (Active / Deleted / Archived etc) [list of users with access]

Control Folder 2: yyyyyy (Active / Deleted / Archived etc) [list of users with access]

Control Folder 3: zzzzz (Active / Deleted / Archived etc) [list of users with access]

Appendix B: Example second email

I emailed you on [date] about [folder name] but I haven't heard back from you yet, so this is a follow-up to make sure it doesn't get missed.

You can click the Self-Service link at the bottom of this email to see the message if you no longer have the original email.

Appendix C: Example third email

I'm following up about the check on [folder name] again. This is now the third email since this check was initiated, and as folder checks are an audit requirement, if I don't get a response I'll need to:

1 - Remove access for all users who do not have an up-to-date Information Security Training record

2 - Record a failure to respond against the folder check

3 - Record an IG incident for referral to the IG Committee

Obviously this creates additional work for us all, and I realise that you are already busy so if we can get a response this week I'll be able to close the job before the above steps must be carried out.

From this morning's report, the current users with access are: [list of current users]

Appendix D: Example final email

Having still not received an answer regarding the check on [folder name], as advised in my previous email of [date] I've been obliged to take the following action:

The following access changes have been made: [list of access changes]

The folder check has been noted as 'Failure to respond'

An IG incident has been recorded (IGxxxxx). You may receive a follow-up from the IG Committee in due course if further investigation is required.

Please let me know if you have any questions.

Version	Effective Date	Summary of changes
1.0	27th Mar 2021	n/a first version
2.0	6th May 2022	Changed 'folder administrators' to 'IAOs', made it clear that the email templates are examples, changed the follow up period to 1 week rather than 2 weeks. Email templates revised.
2.1	22nd July 2024	Change from ScHARR to Division of Population Health. Changed the example first email text.