

## Data Security Policy Involving Research Data in Human Subject Research

This guidance discusses the protection of research information at the University of North Alabama. The Office of Sponsored Programs, working with Information Technology Services and the Human Subject Committee (HSC) has established guidelines for the protection of human subject data. While the responsibility for protecting confidential data ultimately rests with researchers, the NUA provides the following guidance and support.

Information Technology Services is available to review and approve researchers' information security arrangements. In the case of human subjects research, the HSC reviews study data security plans to ensure the protection of confidential information of research participants.

In the case of human subject

agreements, even when the agreements do not include any transfers of funds. Authorized offices are Vice President for Academic Affairs and UNA President.

## 2.0 Research Information from UNA Sources

Research Federal regulation 45 CFR 46 defines research as “a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge.”

Human Subjects Federal regulation 45 CFR 46 defines a human subject as “a living individual about whom an investigator (whether professional or student) conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information. Under these regulations and UNA policy, all “human subjects research” at UNA must be reviewed by the HSC before any related research activities are conducted. Personally identifiable information collected for, used in, or resulting from research involving human subjects must be protected from inadvertent or inappropriate disclosure. The HSC will review and approve the researcher’s data security protocol and insure that security requirements are satisfied. In conducting its review, the HSC may rely on the attestation of the researcher, may request confirmation that there has been a satisfactory information security review, or may take other actions as appropriate to the sensitivity of the information.

Other Sensitive Research UNA researchers may deal with sensitive information that does not relate to human subjects. This information can include proprietary information subject to confidentiality requirements, and information with national security implications. In such cases, the investigator is required to contact the Office of Sponsored Programs for further guidance.

## 3.0 Legal Requests for Research Information

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