

National Marine Fisheries Service
Honolulu, HI 96822

Suggestions for handling confidential or sensitive data

Remember that to fishermen it is “location, location, location.” Meaning that a major part of their strategy is to fish areas they have previously visited without having let any other fishermen know the success (or failure) of those locations. They do not want these areas revealed, even if the identity of the vessel is concealed. Revealing fishing areas can seriously jeopardize their livelihood. Further, we rely on logbooks for much of our scientific analysis. If fishermen feel that we cannot be trusted with their locations and other data, they may begin to misrepresent these numbers, and good fishery management will become much more difficult.

NOAA confidentiality requirements apply to all NMFS Pacific Islands Fisheries Science Center (PIFSC) and Pacific Islands Regional Office (PIRO) staff, including JIMAR and Aquatic Farms associates and Council staff. Here are some rules of thumb we have developed for implementing those requirements.

1. Never pass on data to another person unless authorized by the person who gave the data to you in the first place (this includes responding to FOIA requests).
2. Keep hard copies and electronic storage media (e.g., diskettes, CDs, and DVD) of confidential or sensitive data or data products in a locked file cabinet when not in use.
3. Put hard copies out of sight and clear your computer screen when leaving your office or work space, even if only for a few minutes. We all work in public work spaces, and we need to be sensitive about casual access to data.
4. Shred work sheets and extra hard copies of data when done.
5. Install password protection on your screen saver (to lock down your computer when you're away from your desk).
6. Do not transmit confidential or sensitive data to others via the Internet without taking security precautions.
7. Do not discuss confidential or sensitive data with anyone who does not have access to it. (It's amazing how easy it is to let slip information.
8. Do not plot or present (logbook or observer) data on a single vessel's fishing location, effort or catch.

The rule is that unless there are at least 3 vessels fishing in a given area at a given time, even the (aggregate) effort and catch for that area cannot be presented. This is because if there are only 2 vessels in an area, and you are the owner/operator/crew of one of them, you can subtract your effort and catch from the total and figure out what the other vessel did. This can be a problem at times; work with PIFSC and PIRO on solutions.

9. Read and follow Council SOPP procedures.

10. Read and follow the procedures outlined in the Southwest Region and Southwest Fisheries Science Center Data Confidentiality Handbook which incorporates the standard NOAA rules on confidentiality.
11. Be protective of sensitive information, even though it may not be legally confidential. Avoid its dissemination, presentation or publication whenever possible. Seek guidance from PIFSC and PIRO if you are not sure whether data should be made public or not.