

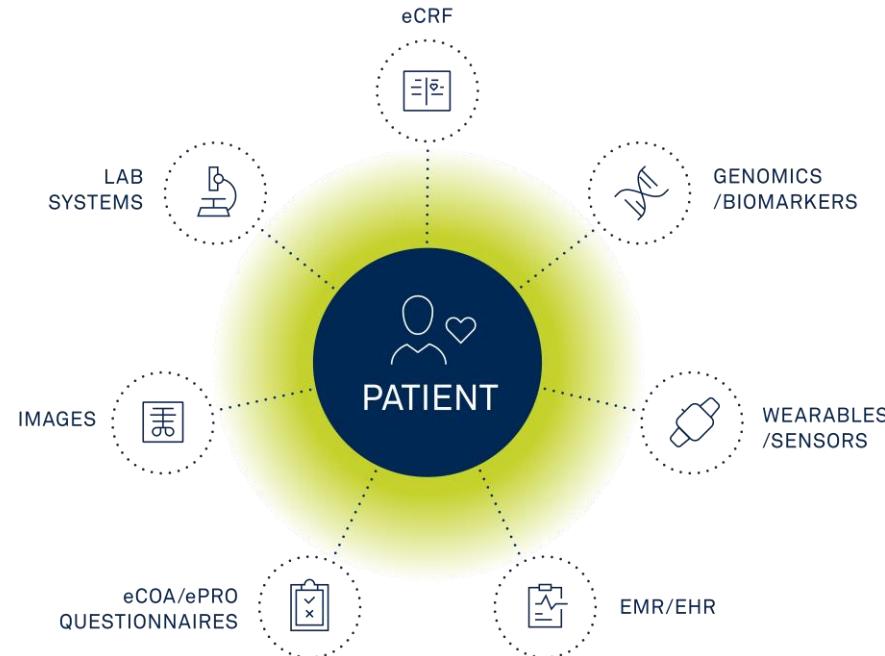
# **Risk assessment and multicultural context analysis**

Gabriel Hanssen Kiss

# Overview

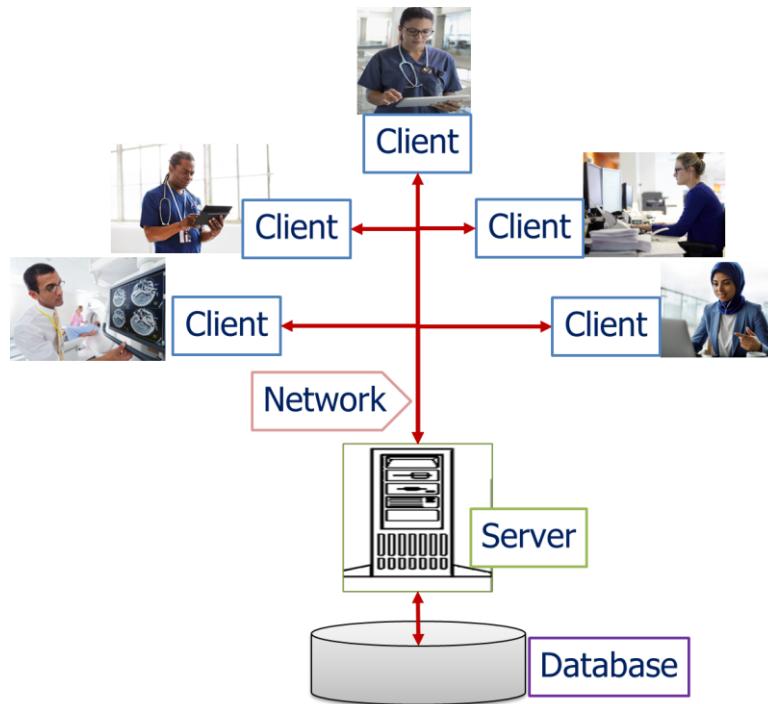
- High level risk assessment for projects working with clinical data: risks and mitigation
- Working with patient data: anonymity, distribution, collaboration, role of ethical committees, multi-cultural aspects
- 5 min break
- Questions / Reflection round the table on how this relevant to the candidate's projects

# What is clinical data?

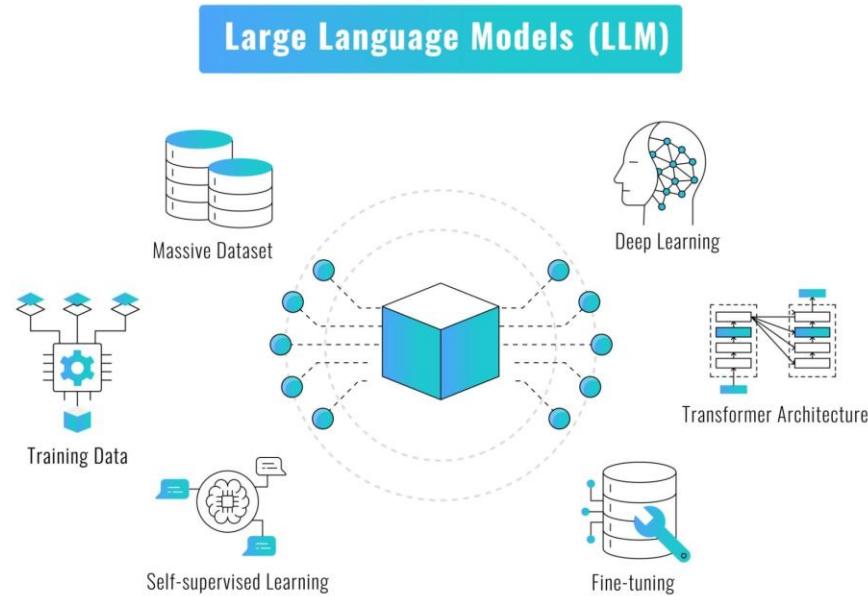


<https://www.medidata.com/en/life-science-resources/medidata-blog/modernizing-clinical-data-management-and-capture/>

# Working with clinical data pre-AI



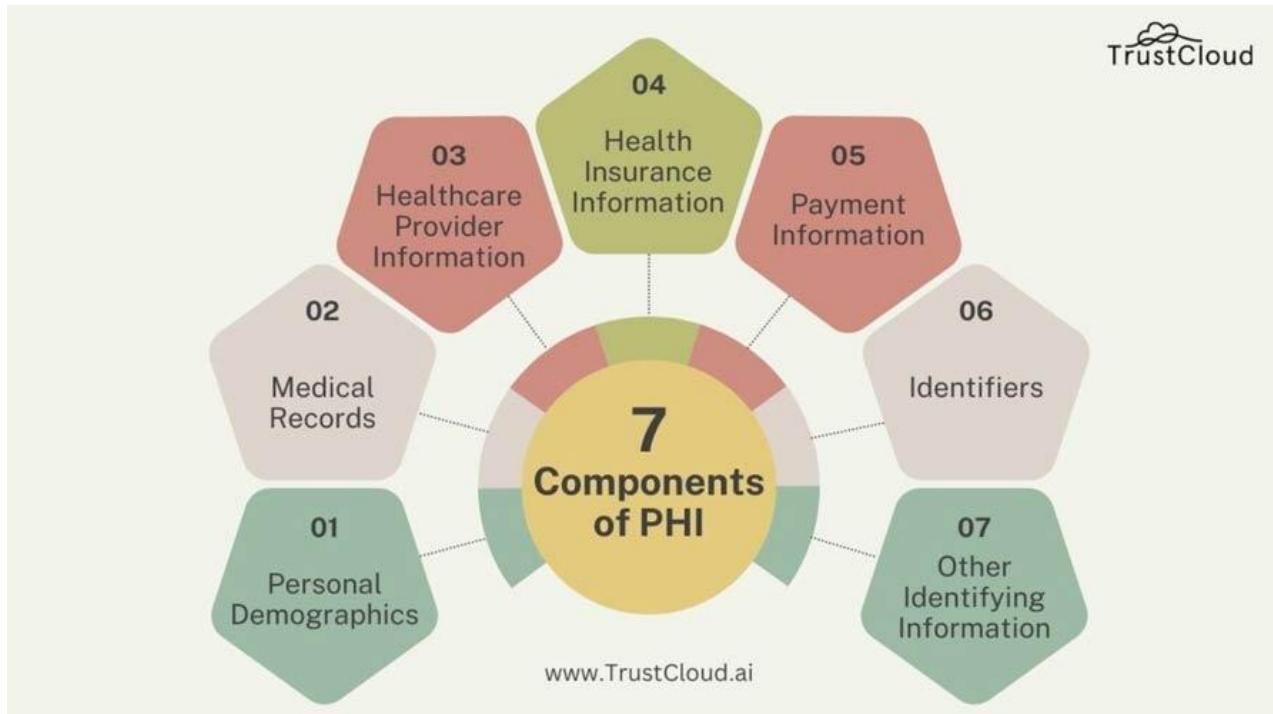
# Working with Clinical Data post-AI



# Clinical Data Risk Assessment

- Understanding the sensitivity of PHI (Protected Health Information)
- The 'Why': Safety, Legal Compliance (GDPR/HIPAA), and Trust
- The High Stakes: Identity theft and medical fraud

# PHI (Protected Health Information)



# GDPR = General Data Protection Regulation



<https://www.usfhealthonline.com/resources/health-informatics/what-gdpr-means-for-healthcare-providers/>

# Fraud....



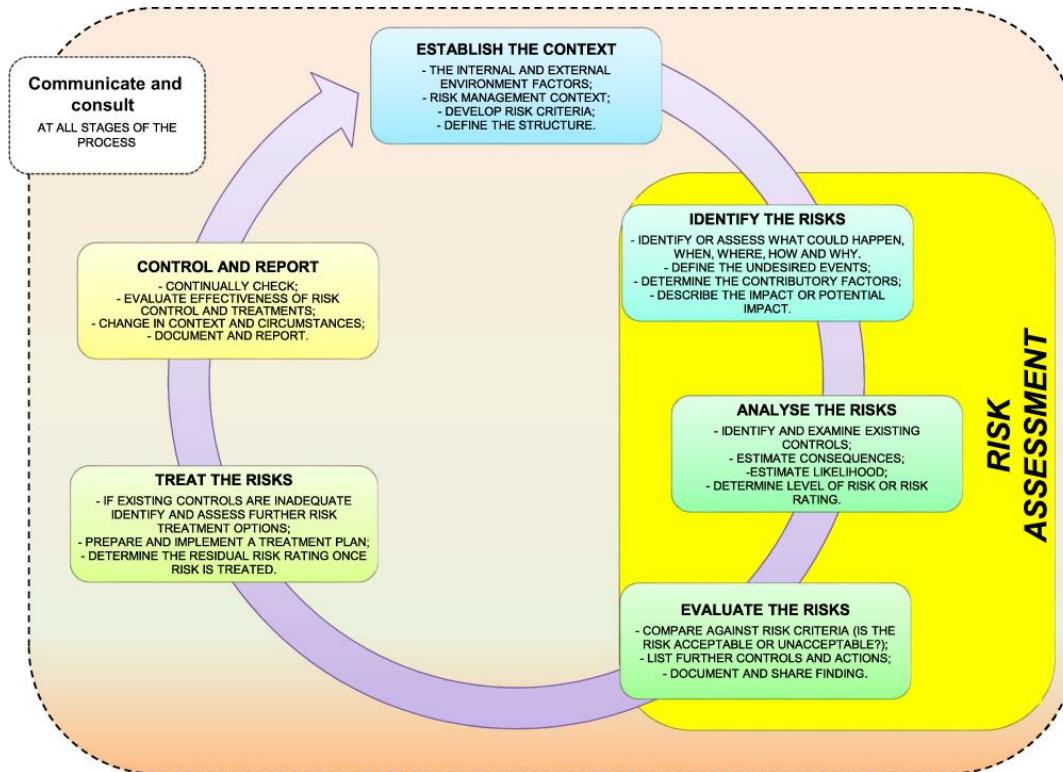
**FAKE TUMORS TRAIN AI  
TO DETECT CANCER  
EARLY**

JULY 1ST, 2024

POSTED BY [JAIME PATTISON-JOHNS HOPKINS](#)

A real abdominal tumor, left, vs. synthetic tumors (Credit: Whiting School of Engineering/Johns Hopkins)

# Risk assessment clinical study



- Reduce the risk to a quantifiable number

DOI <https://doi.org/10.2147/RMHP.S309098>

# Risk assessment

- Many ways of achieving this, can be as simple as this



$$\text{Risk} = L \times I$$

# Risk assessment for a new implant

PROBABILITY	Expected to occur in most circumstances	0,9	0,09	0,27	0,45	0,63	0,81
	Will probably occur in most circumstances	0,7	0,07	0,21	0,35	0,49	0,63
	Might occur occasionally	0,5	0,05	0,15	0,25	0,35	0,45
	Could happen some time	0,3	0,03	0,09	0,15	0,21	0,27
	May happen only in exceptional circumstances	0,1	0,01	0,03	0,05	0,07	0,09
		0,1	0,3	0,5	0,7	0,9	
	Injuries requiring no treatment or first aid	Minor injury, first aid only required	Injury requiring medical treatment and some lost time	Serious injury, hospital treatment required	Death or permanent disability		
IMPACT							

RISK EXAMPLE	PROBABILITY	IMPACT	RISK LEVEL	RISK GRADING
PATIENT INJURY	0,3	0,5	0,15	MODERATE

RISK GRADING COLORS				
0,01-0,03 VERY LOW RISK	0,05-0,07 LOW RISK	0,09-0,27 MODERATE RISK	0,35-0,49 HIGH RISK	0,63-0,81 VERY HIGH RISK

ISO 31000 risk management framework

# Working with Patient Data

- Anonymity vs. Pseudonymization
- The mechanics of secure distribution
- The role of ethical oversight (IRB/REC)

# GDPR - For the patient

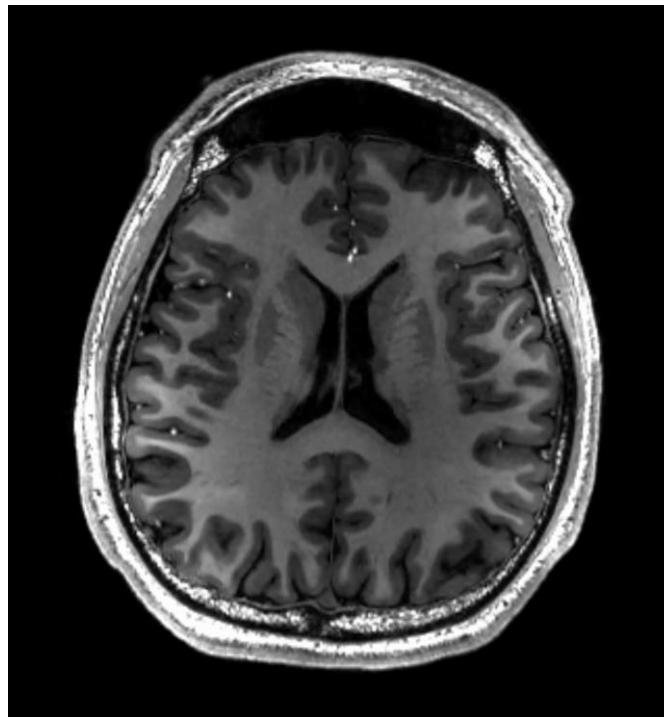
- **Right to be forgotten.** Consumers can withdraw consent from companies that collect their information and have the right to get that information deleted at any time.
- **Right to access.** European residents have access to their personal data stored by a business and can find out how their information is used – free of charge.
- **Right to be informed.** Citizens must give explicit permission to allow companies to gather data on them, and they must be informed about exactly what data is gathered and how it is used.

<https://www.usfhealthonline.com/resources/health-informatics/what-gdpr-means-for-healthcare-providers/>

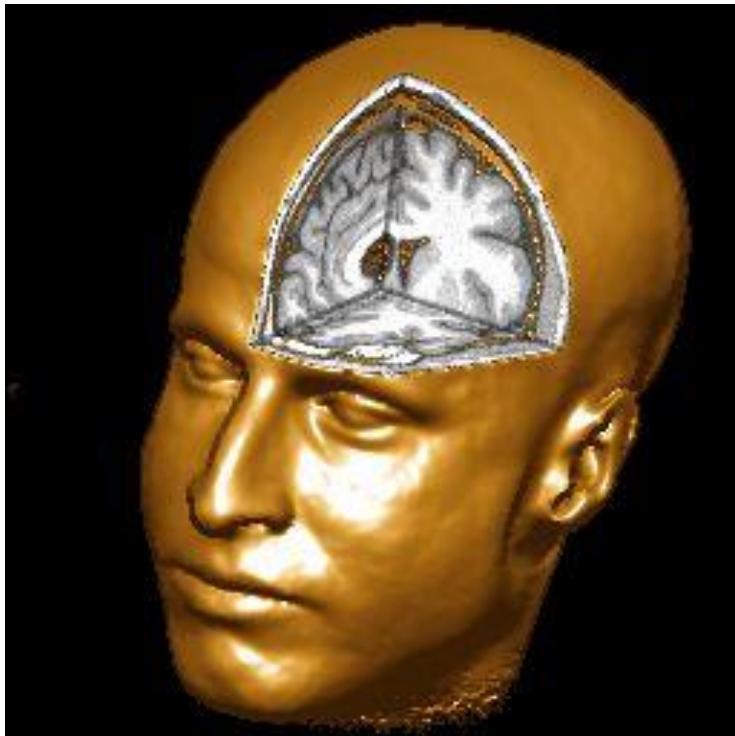
# Patient data

- Who owns it?
  - Patients
- How can you use it for your own research?
  - Informed consent

# Is an MRI / US image anonymous?



# Well...



# What is anonymity?

- Clinical data anonymity = the process of modifying health information to remove or obscure direct and indirect identifiers, making it impossible for anyone to link the data back to a specific individual, thus protecting patient privacy while allowing for research and analysis.
- \* In Norway it is even stricter, it should not be possible to identify a group of up to 5 persons including the one owning the data based on the provided information

# Anonymity vs. Pseudonymization

- Pseudonymization: Using keys (reversible)
- Anonymization: Irreversible removal of identifiers
- The Mosaic Effect: Risks of re-identification through data merging

# Pseudonymization

- Article 4(5) of the GDPR offers a definition for “pseudonymisation” as “the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.”

<https://www.clym.io/blog/pseudonymization>

# Pseudonymization vs. Anonymization: Key Differences



## Personal Data

Name:	John Doe
Condition:	Diabetes
Date:	Jan. 5, 2023

## Pseudonymous Data

Name:	Patient001
Condition:	Diabetes
Date:	Jan. 5, 2023



## Anonymous Data

Name:	-
Condition:	Diabetes
Date:	Jan. 2023

<https://www.clym.io/blog/pseudonymization>

# Pseudonymization vs. Anonymization: Key Differences

## Pseudonymization



## Anonymization



<https://www.clym.io/blog/pseudonymization>

# Anonymization types

Original Dataset:	Pseudonymized Dataset:	Anonymized Dataset:
1. John Doe - Diabetes - Diagnosed on January 5, 2023	1. Patient001 - Diabetes - Diagnosed on January 5, 2023	1. Condition: Diabetes - Diagnosed in January 2023
2. Jane Smith - Hypertension - Diagnosed on February 10, 2023	2. Patient002 - Hypertension - Diagnosed on February 10, 2023	2. Condition: Hypertension - Diagnosed in February 2023
3. Alice Johnson - Asthma - Diagnosed on March 15, 2023	3. Patient003 - Asthma - Diagnosed on March 15, 2023	3. Condition: Asthma - Diagnosed in March 2023

<https://www.clym.io/blog/pseudonymization>

# Anonymity

- Anonymization is when data is changed so much that there's no way to tell who it belongs to, not even by your organization. According to the GDPR, once the data is anonymized, it is no longer seen as personal data so the GDPR no longer covers it.

<https://www.clym.io/blog/pseudonymization>

# Quick quiz!

- If I give you:
  - ZIP code
  - Date of Birth
  - Gender
  - for 100 people in the US (population more than 340 million)
  - How many persons you can identify uniquely?
  - **87**
  - "Mosaic Effect." = combining seemingly minor, separate data points (even public ones) to reveal sensitive or significant patterns

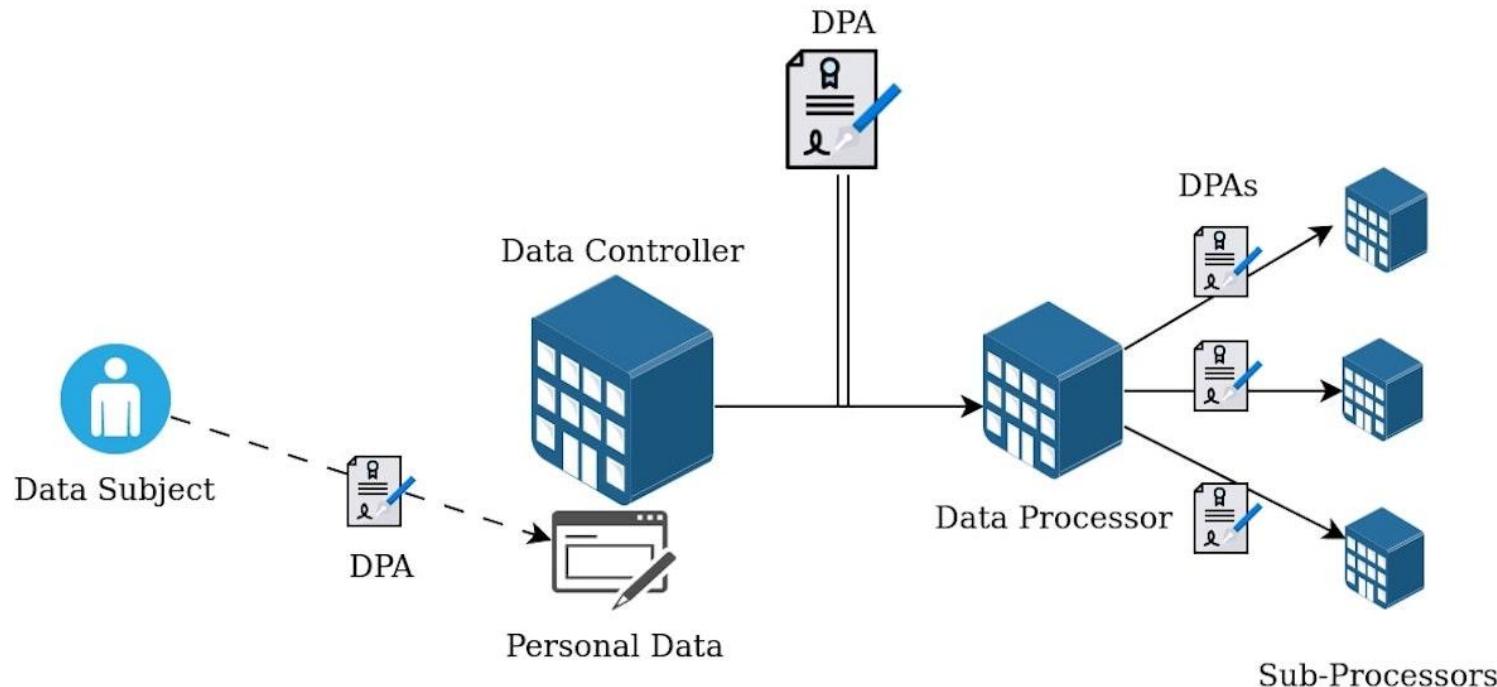
# Secure Distribution of Patient Data

- Data Use Agreements (DUA): The legal framework
- Secure Transfer: SFTP and Trusted Research Environments (TRE)
- Federated Learning: Keeping data on-site while sharing insights

# Data Processing Agreements (DPA)

- Data Processing Agreements (DPA) form a crucial legal framework for sharing sensitive data, acting as contracts that define permissible uses, security requirements, and restrictions (like prohibiting re-identification) to protect privacy, especially under regulations like HIPAA or GDPR, ensuring accountability and compliance by outlining terms for data handling, safeguarding, liability, and eventual data destruction or return between providers and recipients

# Data Processing Agreements (DPA)



# Ethical committees

- **The Belmont Report Principles:**
  - **Respect for Persons:** Patients must give Informed Consent and have the right to withdraw.
  - **Beneficence:** The research must intend to do good; the risks must be justified by the potential knowledge gained.
  - **Justice:** We must not experiment on vulnerable populations just because they are "available."

# Ethical committee application

- Depends on your research:

**Regional committees  
for medical and health  
research ethics**

Go to the pages for those applying to REK

**Committees for clinical  
trials of medicines and  
medical devices**

Go to the pages for those applying to REK  
KULMU

<https://rekportalen.no/en/>

# Ethical committee approval

**Prosjektsøknad** Skjema for søknad om godkjenning av forskningsprosjekt i de regionale komiteer for medisinsk og helsefaglig forskningsetikk (REK)

2016/1276-1  
Dokument-id: 727907 Dokument mottatt 14.06.2016

## Brukgrensesnitt og visualisering av ultralyd data på mobile enheter, for ikke-ekspert brukere

### 1. Generelle opplysninger

#### 1.1 Prosjektleder

Navn:	Gabriel Kiss
Akademisk grad:	PhD
Stilling:	Forsker
Hovedarbeidsted:	NTNU
Arbeidsadresse:	ISB
Postnummer:	7491
Sted:	Trondheim
Telefon:	91897945
E-post adresse:	gabriel.kiss@ntnu.no

#### 1.2 Prosjekttittel

Norsk tittel	Brukgrensesnitt og visualisering av ultralyd data på mobile enheter, for ikke-ekspert brukere
Vitenskapelig tittel	User interface and visualization of ultrasound data on mobile devices, for non-expert users

#### 1.3 Forskningsansvarlig

- They require a project description but do not care about it from a research perspective
- What they evaluate is:
  - What data is acquired
  - How it is stored / is it anonymized
  - If a patient treatment changes from the current protocol what are the risks for the patients
  - Follow-up actions in case of emergency cases
  - Are companies involved if so do project participants own shares -> conflicts of interest
  - Planned publications
  - What happens to data after the project is completed

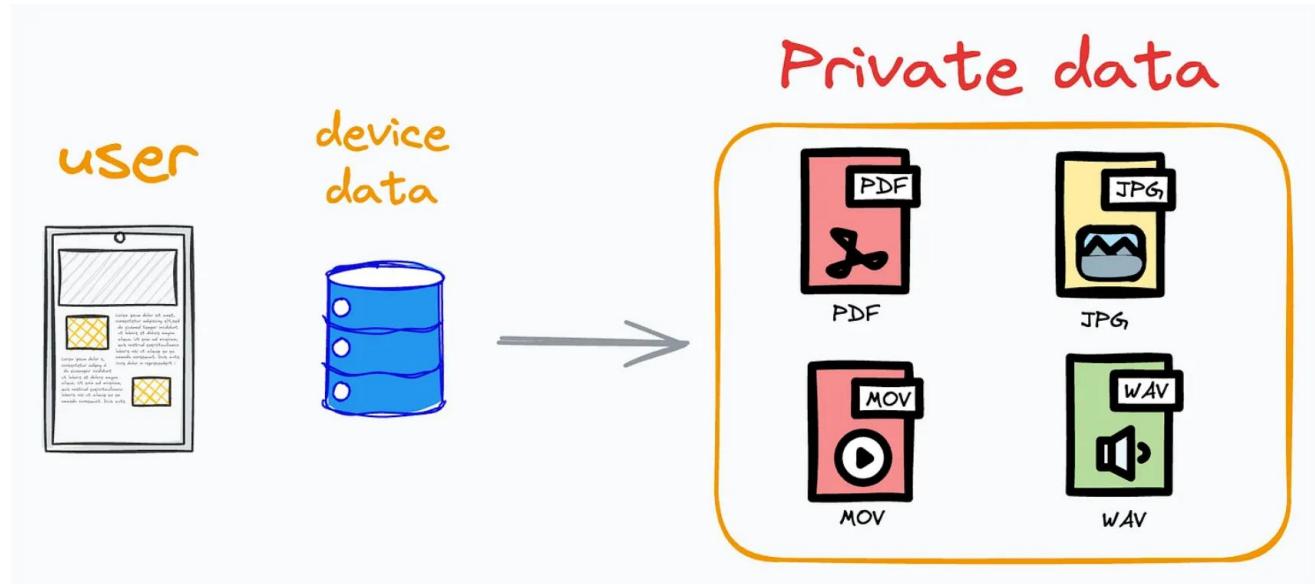
# Data security

- **Encryption:** Protecting data in storage (at rest) and during transmission (in transit) using strong protocols.
- **Access Control:** Implementing Role-Based Access Control (RBAC) and Multi-Factor Authentication (MFA) to ensure only authorized personnel access necessary data.
- **Data Classification:** Identifying and labeling data sensitivity (e.g., PHI) to apply appropriate security measures, often using automated tools.
- **Regular Audits & Monitoring:** Continuously monitoring network traffic and auditing logs for suspicious activity.
- **Patch Management:** Keeping all software, operating systems, and medical devices updated to fix vulnerabilities.
- **Employee Training:** Educating staff on phishing, data handling, and security best practices.
- **Incident Response Plan:** Having a documented plan to quickly detect, respond to, and mitigate data breaches.
- **Vendor Management:** Ensuring third-party partners meet the same high security standards.
- **Compliance:** Adhering to standards like HIPAA (US), GDPR (EU), and HITRUST.

# Standards / frameworks

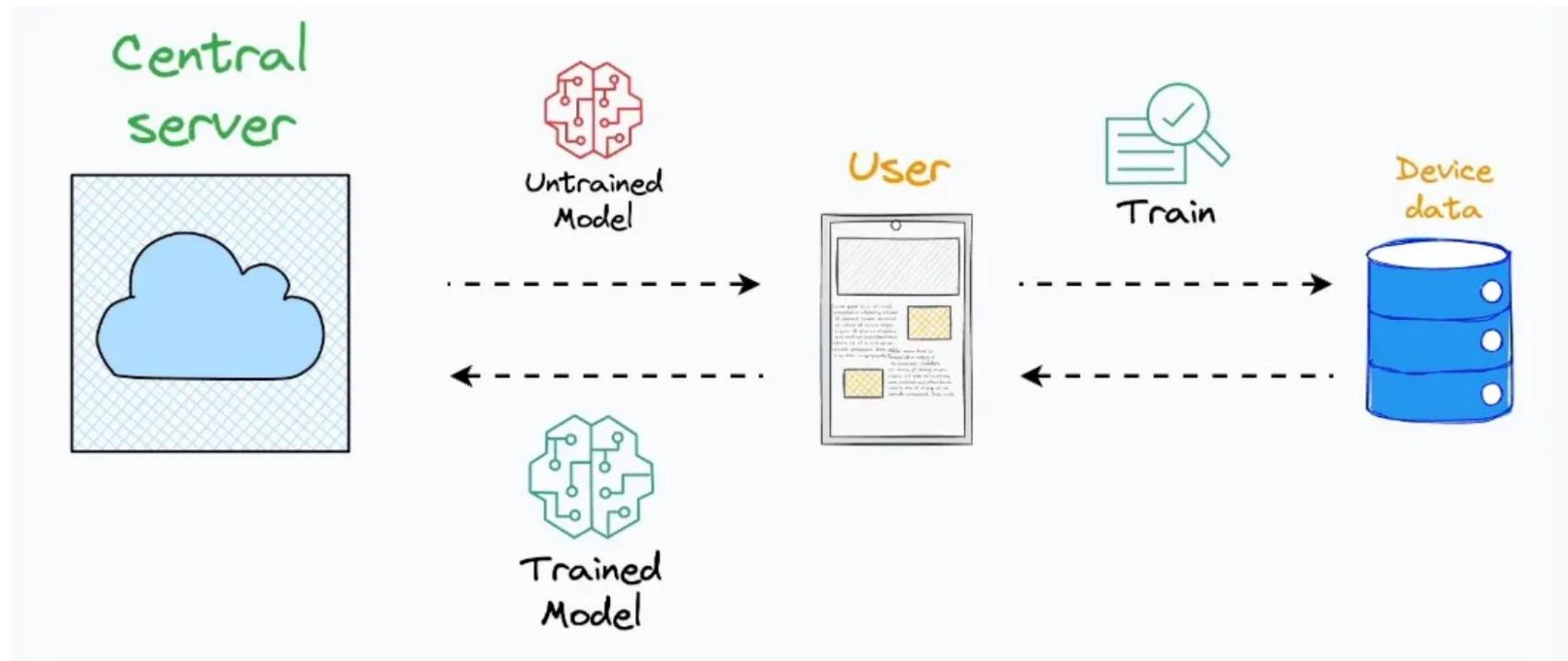
- **HIPAA Security Rule (US)**: Mandates physical, technical, and administrative safeguards for PHI.
- **IEC 81001-5-1**: A specific cybersecurity standard for medical devices and health IT software.
- **HITRUST**: A framework for managing risk, security, and compliance in healthcare.

# Federated learning - Need

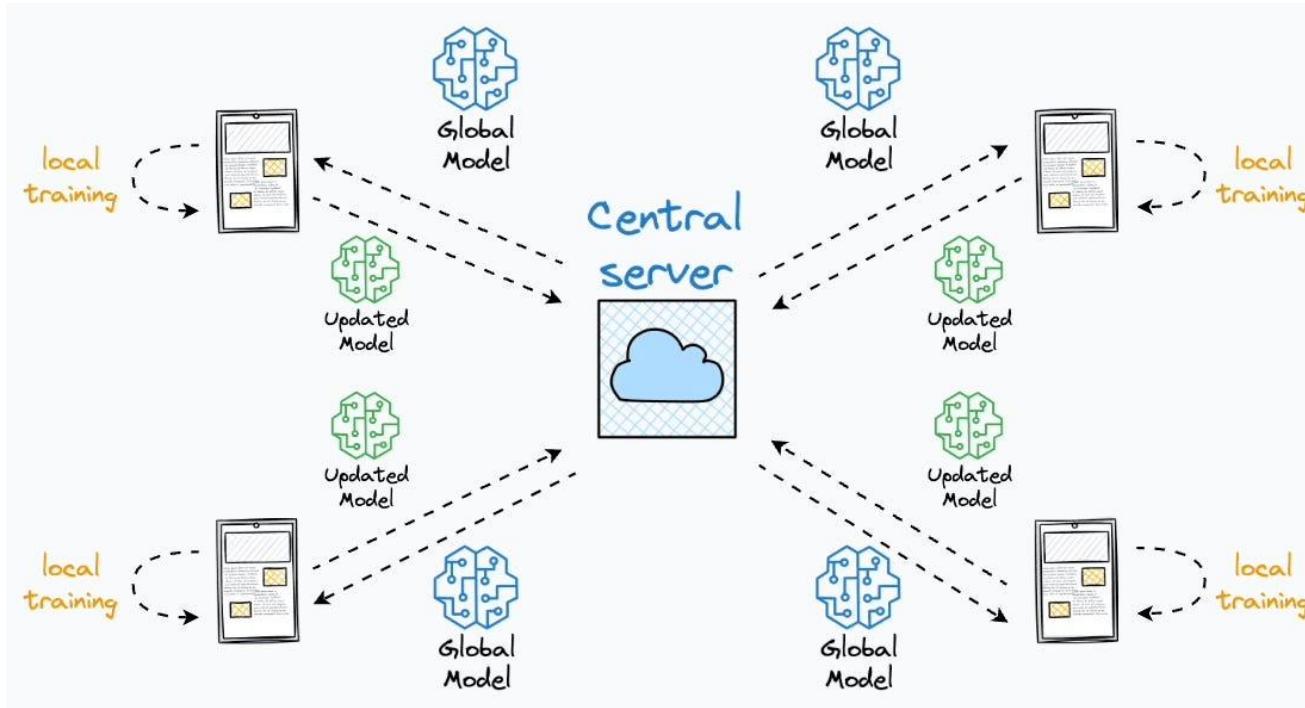


- What happens when you want to include multiple sites, different hospitals in different countries?

# Federated learning - Principle



# Federated learning - Overview



<https://blog.dailydoseofds.com/p/introduction-to-federated-learning>

# Federate learning – Side note

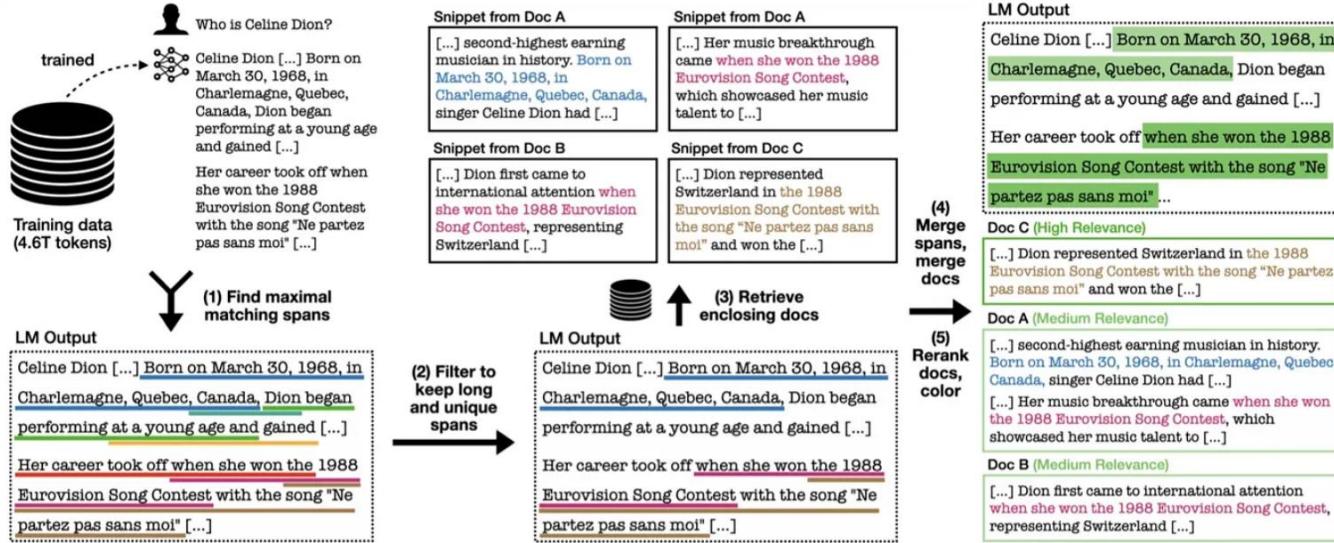


Figure 2: The OLMOTRACE inference pipeline, as described in §3. For better illustration, we slightly adjusted the highlighted spans and document relevance from the actual example.

“OLMOTRACE: Tracing Language Model Outputs Back to Trillions of Training Tokens” by Liu et al. (2025),

# It is still possible to do research?



# Research: Openly available datasets

- Challenges

Challenge name	Acronym	DOI
Advancing Generalizability and Fairness in Breast MRI Tumour Segmentation and Treatment Response Prediction	MAMA-MIA	<a href="https://doi.org/10.5281/zenodo.15052677">10.5281/zenodo.15052677</a>
AIMS-TBI - Automated Identification of Moderate-Severe Traumatic Brain Injury Lesions	AIMS-TBI	<a href="https://doi.org/10.5281/zenodo.15084119">10.5281/zenodo.15084119</a>
Automated Lesion Segmentation in Whole-Body PET/CT and Longitudinal	autoPET/CT IV	<a href="https://doi.org/10.5281/zenodo.15045095">10.5281/zenodo.15045095</a>
Benchmarking of Artificial Intelligence and Radiologists for Lung Cancer Screening in CT: The LUNA25 Challenge	LUNA25	<a href="https://doi.org/10.5281/zenodo.15094630">10.5281/zenodo.15094630</a>
Calibration and Uncertainty for multiRater Volume Assessment in multiorgan Segmentation 2nd Edition	CURVAS - PDACVI	<a href="https://doi.org/10.5281/zenodo.15045199">10.5281/zenodo.15045199</a>
CARE 2025: Comprehensive Analysis & computing of REal-world medical images	CARE2025	<a href="https://doi.org/10.5281/zenodo.15045249">10.5281/zenodo.15045249</a>
Challenge for Vision-Language Modeling in 3D Medical Imaging	VLM3D	<a href="https://doi.org/10.5281/zenodo.15052707">https://doi.org/10.5281/zenodo.15052707</a>
Deep-learning Evaluation for Enhanced Prognostics - Prostate Specific Membrane Antigen	DEEP-PSMA	<a href="https://doi.org/10.5281/zenodo.15094694">10.5281/zenodo.15094694</a>
Dehazing Echocardiography Challenge 2025	DehazingEcho 2025	<a href="https://doi.org/10.5281/zenodo.15083973">10.5281/zenodo.15083973</a>
Combining Histology, Medical imaging and molEcular data for medical pRognosis and diAgnosis	CHIMERA	<a href="https://doi.org/10.5281/zenodo.15045552">10.5281/zenodo.15045552</a>

# Clinical trials



PRS Login

## ClinicalTrials.gov

Find Studies ▾ Study Basics ▾ Submit Studies ▾ Data and API ▾ Policy ▾ About ▾

My Saved Studies (0) →

[Home](#) > Expert Search

### Expert Search

Expert Search allows you to focus your search using complex search queries to get more precise results.

#### Search Query

Enter your search parameters below. For help, see the [Constructing Complex Search Queries](#) and [Search Areas](#) pages.

Colon Cancer Screening

Search

#### Search Query History

Below is a list of up to ten of search queries. Only your ten most recent searches will appear here.

# Nice overview of available data



Unknown status 

Verified  2016-10 by John F. Gray MD FACG AGAF, Renown Regional Medical Center

Last known status was: Active, not recruiting

## FIT Mailing Protocol-For Cancer Screening Navigation

ClinicalTrials.gov ID  NCT02934958

Sponsor  Renown Regional Medical Center

Information provided by  John F. Gray MD FACG AGAF, Renown Regional Medical Center (Responsible Party)

Last Update Posted  2016-10-17

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### Study Details

### Researcher View

No Results Posted

### Record History

#### On this page

Study Overview

Contacts and Locations

Participation Criteria

Study Plan

## Study Overview

### Brief Summary

We plan to study whether the impact of offering the choice of a pre-colonoscopy physician visit or direct referral to colonoscopy will increase adherence to colonoscopy relative to usual care in a large fecal immunochemical test (FIT) mailing campaign.

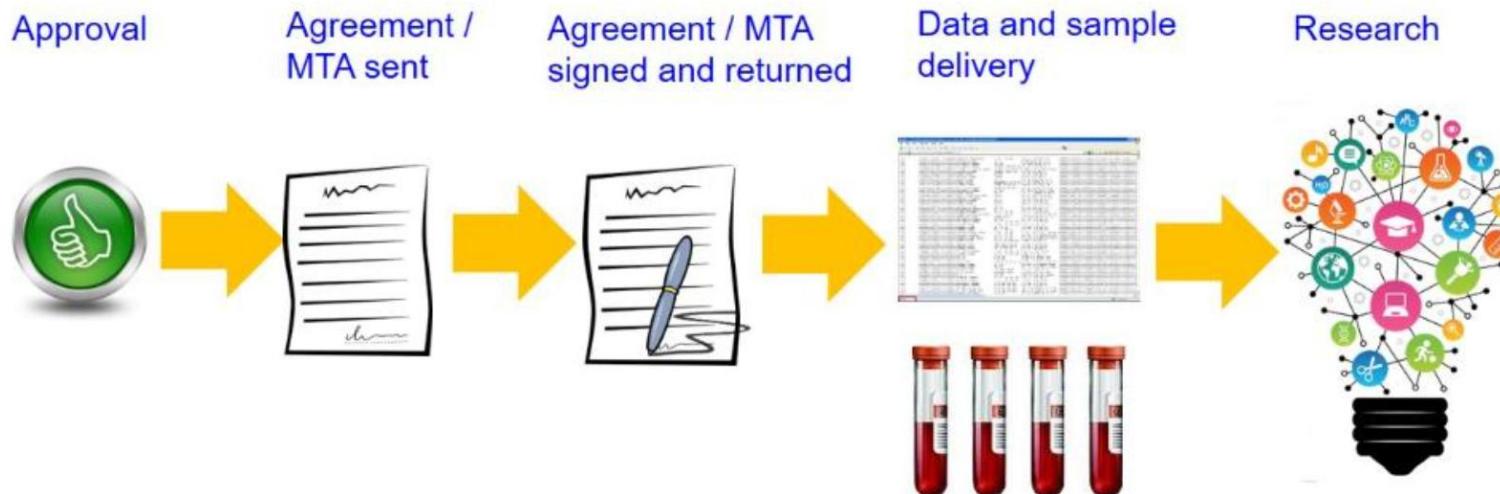
Study Start 

2015-10

Primary Completion (Estimated) 

# What are other options?

- Biobanks



# Bring compute to the data

## For researchers

### Digital labs for sensitive data science

Focus on your research with confidence, assured that your data is secure and compliant with all regulations.

Our labs provide you with the creative freedom you need, secured within our high-trust framework.

CONTACT US >



HUNT cloud: <https://about.hdc.ntnu.no/en/researchers/>

# Why bother....

- Sometimes it goes terribly wrong even if the intentions are good

## Sweden: surgeon convicted of bodily harm over synthetic trachea transplant

Court finds that Paolo Macchiarini carried out experimental procedure on patient who was not critically ill



A photograph of Paolo Macchiarini released in 2011 by Stockholm's Karolinska University hospital, where he carried out the transplants. Photograph: Karolinska University Hospital/AFP/Getty Images

A Swedish court has found an Italian surgeon, once hailed for pioneering windpipe surgery, guilty of causing bodily harm to a patient, but cleared him of assault charges.

# Patient benefits

## The Seven GDPR Principles



# Avoids discrimination

## Special Category Data Under the GDPR



Personal data  
revealing  
**racial or  
ethnic origin**



Personal data  
revealing  
**political  
opinions**



Personal data  
revealing  
**religious or  
philosophical  
belief**



Personal data  
revealing  
**trade union  
membership**



**Genetic data**



**Biometric data**  
(where used for  
identification  
purposes)



Data concerning  
**health**



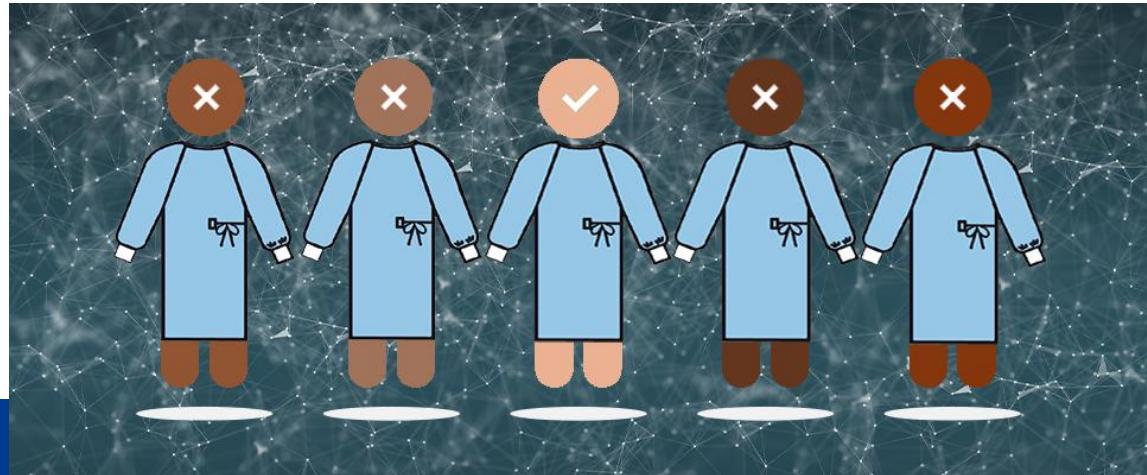
Data concerning  
a person's  
**sex life**



Data concerning  
a person's  
**sexual  
orientation**

# AI discrimination

- Many reasons
  - Biased historical data
  - Unequal healthcare availability
  - Research funding bias towards high developed countries
- Biased training data
- Biased models



# Openness – algorithmic discrimination

- **Generative AI systems:** certain [generative AI systems](#), such as [chatbots](#), do not seem dangerous at first glance, but can still pose [threats](#) to fundamental rights and freedoms, for example when they generate [hate speech](#). Generative AI is not classified as high-risk as such. However, some generative AI systems that harm fundamental rights might be included in the high-risk system [list](#) that regulators can update periodically, as laid down in the [AI Act](#).
- **Autonomous cars:** discrimination could also arise in [insurance calculation](#) or AI [machine vision systems](#) – for instance, if autonomous cars are developed in a way that will detect more accurately pedestrians with lighter than those with darker skin.
- **Job recruitment and employment:** algorithms selecting job applicants might contain [bias](#), for example with respect to gender or health.
- **Credit scoring and banking:** AI systems are increasingly used in the banking and credit [sectors](#) as a support tool to assess the granting of loans or mortgages. These systems may follow decisional processes that hide discrimination or mask bias based on factors such as clients' residence or ethnicity.

# More to come: AI act



<https://www.sorainen.com/publications/the-ai-act-is-here-the-time-to-act-is-now/>

# High-risk AI systems

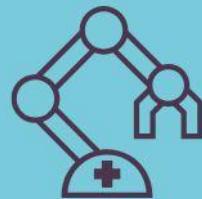
Critical transport infrastructure



Aerospace control systems



Civilian defence and security systems



Medical devices and therapeutic aids

Source: EU AI Act Annex III

*Bluefruit*  
Software

# Discussion Questions

- Is 100% security possible or even desirable in research?
- Does a 1% risk of re-identification justify a potential cure?
- Should patients have a 'right to be forgotten' in medical datasets? i.e. they ask to be removed after you trained your fancy AI models
- What data are you using in your projects?
- What paperwork do you need to fill out?