

# Privacy Sub-Committee Charter

## University Ethics and Compliance Program

### Supporting a Culture of Integrity, Accountability, and Equity

#### Authority

The Privacy Sub-Committee is formed by the standing [University Ethics and Compliance Committee](#) with a specific focus on the privacy of personal information.

#### Purpose

Western Washington University is committed to the protection and responsible use of personal information collected from and about its students, faculty, staff, alumni, donors, business partners, and others who engage with the University. Those responsible for handling personal information are expected to do so with the utmost care and in compliance with the University Privacy Program Principles. See the *Affording Individual Privacy Rights Policy* ([POL-U5315.02](#)).

The role of the sub-committee is to establish a written University Privacy Program designed to oversee the governance and oversight of privacy related activities necessary to ensure that:

1. The highest ethical standards are understood and consistently applied in the collection, storage, use, disclosure, and destruction of personal information,
2. Internal controls are effectively designed and implemented,
3. A strong partnership is maintained between the privacy and information security program for effective data governance.

#### Sub-Committee Member Responsibilities

1. Assist Compliance Services with creating a written University Privacy program that includes, at a minimum:
  - a. A framework and principles of a University Privacy Program,
  - b. An action plan to meet the goals of the program and incorporates the elements of an effective compliance program,

- c. A reporting structure for effective leadership oversight, and
- d. Clear communication methods for individuals to exercise their privacy rights.

2. Support individual privacy compliance owners by:

- a. Sharing ideas for implementing and monitoring internal controls for their individual privacy programs,
- b. Determining where tools and resources can be collectively designed and implemented to serve multiple privacy compliance areas, and
- c. Forming a collective voice for reporting to executive leadership on the progress, issues, and resources needed, to effectively manage privacy responsibilities and risks.

## Sub-Committee Composition

**Chair/Privacy Program Coordinator:** University Compliance Officer

The Chair will be responsible for coordinating the activities of the sub-committee and reporting updates to the University Ethics and Compliance Committee.

### Core Membership

The core members include Compliance Owners responsible for the oversight of records containing personal data. Delegated Compliance Owners by privacy regulatory category are listed under the “Information” Compliance Category in the University’s [Regulatory Compliance Accountability Matrix](#). Other core members include subject matter experts essential to facilitating the goals of the sub-committee. Core members are recommended by the standing University Compliance Committee and approved by the Provost and Vice Presidents.

### Core Members:

- FERPA Officer (Student Data)
- AVP for Human Resources (Employee Data/Background Check Data)
- HIPAA Officer (Medical Data)
- Director of Financial Services (Financial Data)
- Vice Provost of Research (Proprietary Research/Intellectual Property Data/Export Controls)
- AVP for Advancement Services (Donors and Alumni Data)
- Assistant Dean of Libraries (Library Records)
- Chief Procurement Officer (Vendor data/Non-disclosure agreements/3rd Party Data Sharing)
- Director, Office of Institutional Research

- University Ethics Advisor
- Enterprise Application Services Director/Data Governance Committee Chair
- University Archivist/Records Manager

**Ad Hoc Advisors and Key Stakeholders**

Ad hoc advisors and key stakeholders identified by the sub-committee (or Compliance and Ethics Committee) and will be kept up to date on Sub-Committee activities and brought in to advise on specific issues, data, and activities as needed.

**Ad Hoc Advisor**

Assistant Attorney General  
 Vice Provost, Info Technology/CIO  
 Director, Information Security  
 Director, Risk Management  
 Director, LGBTQ+  
 Director Civil Rights & Title IX Compliance  
 Director of Business and Financial Systems  
 Public Records Officer

**Area**

Legal/Attorney-Client Privileged Records  
 Information Technology/Security  
 Information Security  
 Risk Management  
 Diversity/Equity  
 EEO/AA/Civil Rights  
 Business and Financial Systems  
 Public Records

**Key Stakeholders**

Assistant VP ESS/Director of Financial Aid  
 Director, Disability Access Center  
 Disability/FMLA Administrator, HR  
 Counseling Clinic Director  
 Student Health Center Director  
 Speech Language Hearing Clinic Directors  
 Psychology Department Counseling Clinic  
 Director of Athletics  
 Worker’s Compensation Claims Manager  
 Director of Environment, Health, & Safety  
 Asst Dir. Financial & Bus Svs, FM  
 Special Assistant for Faculty Relations  
 Compass 2 Campus Executive Director  
 Director, Child Development Center

**Data Category**

Financial Aid Data  
 Student Disability/Medical Data  
 Employee Disability/Medical Data  
 Students Mental Health Data  
 Student Medical/Insurance Data  
 Public Medical Data  
 Public Mental Health Data  
 Athlete medical records/athlete recruits  
 Medical claim records/third party  
 Employee vaccination records  
 Employee alcohol/drug testing records  
 Faculty Personnel Data  
 Minors  
 Minors

Dean of Libraries

Director of Admissions

Chief of Police

Dir. Admin/Financial Mgmt, OCE

Director, Student Business Office

Director, WebTech Services

Library Patrons

Prospective Student Data

Body Cam/Surveillance Video/Police Records

Customer Data

Customer Data

User Generated Online Personal Data

February 9, 2022- Approved by President's Cabinet

February 25, 2022 - Minor Rev.