PRIVACY SUB-COMMITTEE
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 the Compliance Office 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 (Propriety Research/Intellectual Property Data/Export Controls)
- Advancement [TBD] (Donors and Alumni Data)
- Assistant Dean of Libraries (Library Records)
- Chief Procurement Officer (Vendor data/Non-disclosure agreements/3rd Party Data Sharing)
- 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
- 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
- Diversity/Equity
- Business and Financial Systems
- Public Records

**Key Stakeholders**
- Assistant VP, Enrollment & Student Svs
- 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 Fiscal/Bus/Prg Svcs (FM)
- Special Assistant for Faculty Relations
- Compass 2 Campus Executive Director
- Dean of Libraries
- Director of Admissions
- Chief of Police
- Admin/Financial Mgmt Dir, OCE

**Data Category**
- Financial Aid 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
- Library Patrons
- Prospective Student Data
- Body Cam/Surveillance Video/Police Records
- Customer Data