Data Governance Policy

Accommodations for individuals with disabilities in accessing these policies are available upon request by emailing accessiblepolicy@wcupa.edu

Purpose and Scope

Data is a critical resource at West Chester University (WCU) and should be managed responsibly. This policy governs the WCU community's actions regarding collection, quality and integrity, accessibility, management, and protection of institutional data. Research data is outside of the scope of this policy and is governed by separate policies through the Office of Research and Sponsored Programs.

Data governance ensures WCU's ability to make informed decisions and adhere and comply to various regulatory frameworks and bodies. The lifecycle of data management will be guided by the principles below.

Guiding Principles

- Data Governance Framework: Formal framework that includes a governance committee, policies, procedures, roles and responsibilities, data management tools and training.
- Data access and Compliance: Promote appropriate data practices and compliance with relevant laws and regulations. Educate staff, students, and stakeholders about the approved use of data and the consequences of non-compliance.
- Data Quality and Integrity: Implement processes and standards to maintain data accuracy, consistency, and reliability. Regularly assess and audit data to minimize errors and inconsistencies.

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- Commitment to Transparency: Foster a culture of transparency in data governance practices. Communicate data policies, procedures, and decisions openly to stakeholders, promoting trust and accountability.

- Utilizing a Single Source of Record: Ensure that a single, authoritative source of data is defined for critical data elements. This "single source of record" should be maintained and regularly updated to eliminate data inconsistencies and duplication.

- Data Access and Authorization: Define access controls and authorization processes to restrict data access to authorized personnel only. Implement role-based access control and enforce the principle of least privilege.

Policy Statement

Data is a vital asset to West Chester University that facilitates strategic decision making and supports student success. To ensure our institutional data is accurate, and utilized responsibly and effectively, it must be available, accessible, and of high quality, resulting in the outcome of accurate data being leveraged in a timely manner to make data-informed decisions.

To ensure this outcome, West Chester University has developed a data governance program that will provide a framework for the creation and enforcement of data policies along with the identification of roles and responsibilities pertaining to the management and oversight of data. This policy applies to individuals whose association with the University necessitates or permits access to institutional data. All data must be stored in technology systems that are owned, purchased, or leased by the Pennsylvania State System of Higher Education or West Chester University.

Roles and responsibilities. WCU community members may hold one or more of the roles listed below. Each individual is responsible for carrying out the duties

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related to their roles and attending training appropriate to their roles and functional areas. Training opportunities will be offered on a regular basis by the Data Governance Committee and the affiliated offices.

Roles and Responsibilities

- Data Owner: Ownership of data lies at the institutional level rather than at the individual level, with West Chester University being the owner of all institutional data.
- Executive Sponsors: Senior leaders who have high-level responsibilities for data governance at the University.
- Data Governance Committee: The group that works under the auspices of the executive sponsors to create and maintain a framework that supports individuals and units in carrying out effective data governance practices.
- Data Trustees: Senior officials or their designees who are accountable for the data within their divisions and functional areas.
- Data Stewards: Data Stewards have policy and planning responsibilities to ensure the appropriate use of data within their functional area.
- Data Custodian: Data Custodians are accountable to and work with Data Stewards in implementing the policies and procedures that govern the data in their functional area.
- Data User: Data Users are members of the WCU community who have been granted access to view reports containing institutional data.

Data Dashboard. The data dashboard will be a repository for institutional data. It will include links to the data glossary, data dictionary, mapping of systems, training, roles and responsibilities, and data governance policies.

Data Policies. Policies pertinent to data governance will be housed in the WCU policy library.

Training. Training will be available based on an individual's roles and responsibilities.

Definitions

Institutional data – Information collected by or for the university for the purposes of planning, managing, operating, controlling, or auditing university functions, operations, and mission. It does not include research data, or data owned or generated by an external entity when used in research.

Research data - A systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge.

Least privilege - Each user is granted the minimum system resources and authorizations that the user needs to perform their duties.

References Definition of Least Privilege:
https://csrc.nist.gov/glossary/term/least_privilege
Definition of Research: https://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/revised-common-rule-regulatory-text/index.html#46.102

Reviewed by: Data Governance Committee, Associate Provost for Research and Creative Activities, Executive Director for Academic and Enterprise Systems,

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Date

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