

New River Policy



NEW RIVER
Community and Technical College
Central Administration

POLICY NAME	Privacy Policy	POLICY NO.	NR 6.3
RESPONSIBLE OFFICE	IT and HR	EFFECTIVE DATE	06/01/2024
DATE OF LAST REVISION	04/09/2024	DATE OF NEXT REVIEW	April 2025
		DATE APPROVED	5.31.24

SCOPE

This policy covers all Institutional Data, including but not limited to data on all media, principal copies, backup copies, printed copies, and archival copies. This policy is applicable to and binding for all New River Community and Technical College constituents, including but not limited to all students, faculty, staff, affiliates, guests, contractors, vendors, and others who access Institutional Data from on-campus or off-campus.

Compliance – Legislative Rule

1. [West Virginia Code § 18B-1D-10](#) State data sharing compact; legislative intent; findings; definitions.
2. [Public Law 106-102 Gramm-Leach-Bliley Act](#) (GLBA)
3. [Family Educational Rights and Privacy Act](#) (FERPA) 20 U.S.C. § 1232g; 34 CFR Part 99

PURPOSE

This policy establishes accountability for privacy risk management, privacy training, and compliance with current privacy rules and laws.

Data privacy is every user's responsibility, but data submitted to and used by the College must also be safeguarded by College employees to protect user privacy. **Data Specialists** who input data have responsibility for the integrity and security of the information and this responsibility is shared with supervisors who serve as **Data Owners**. Together, **Specialists** and **Owners** provide day-to-day direct management of Institutional Data, to ensure its availability, integrity, and security as it is used throughout the College. **Data Stewards** facilitate this management of data by providing routine and periodic oversight and monitoring to ensure compliance and adherence with defined procedures.

It is the purpose of this policy to:

1. Enforce data standards and procedures as defined in the **Data Standards and Procedures Manual** regarding the management of Institutional Data, particularly as they pertain to user privacy.
2. Adhere to the governance structure for managing Institutional Data as defined in the **Data Governance Plan** to establish clear accountability, responsibility, and authority for data management, particularly as it relates to user privacy.
3. Establish responsibility for defining a framework to assess and manage privacy risk, establish standards, provide privacy training, and ensure compliance with privacy rules and laws.
4. Establish and enforce compliance with privacy frameworks and standards.
5. Recognize the primary operational roles for data entry, data management, and data oversight that include accountability for personal information used to identify parties.

TERMS AND DEFINITIONS

TERM	DEFINITION
Role-Based Access Control	Role-based access control (RBAC) is a method of restricting access to data based on the roles of individual users within an enterprise. RBAC lets employees have access rights only to the information they need to do their jobs and prevents them from accessing information that doesn't pertain to them.
Data Specialists	College employees, agents, or other properly authorized individuals who access the Institutional Data in performance of their assigned duties on behalf of the College.
Data Owners	College officials who have operational level responsibility for the capture, maintenance, dissemination, and storage of Institutional Data.
Data Stewards	Senior College officials who have enterprise authority and oversight responsibility for guiding and securing the management of Institutional Data.
Data Governance Board	The President's Cabinet communicates the value of data governance and ensures that information privacy efforts align with business needs as they approve and enforce rules and policies.

POLICY

Data Stewards create relevant privacy policies and procedures to manage privacy risk, satisfy compliance requirements, and safeguard Institutional Data. The **Data Governance Board** (President's Cabinet) approves privacy policies and makes recommendations to the President. The Data Governance Board also communicates the value of privacy awareness and supports the enforcement of related control mechanisms, procedures, and training.

Institutional Data is owned by the College. Access to data, reports, and other related information is governed according to College policies and guidelines using role-based privileges. All data specialists, owners, and stewards of College data are responsible for the proper application of relevant College policies and guidelines. **Institutional Data** includes:

1. *Student Data*—information in the enterprise Student Information System, but also in auxiliary systems that include the Customer Relationship Management (CRM) system, Admissions, Student Success, ID Card system, Learning Management System, Mass Notification system, Early Alert System, and others.
2. *Administrative Data*—financial and financial aid data as well as employee and tax information.
3. *System Data*—information used for identity and access, E-mail, shared documents, and digital files.
4. *Physical Facilities Data*—information used for facility access, monitoring, management, and equipment as well as vehicle usage and licensing.

The College expressly forbids the use of Institutional Data for anything but the conduct of College business and those accessing these data must (1) adhere to requirements for confidentiality and privacy, (2) comply with protection and control procedures, (3) accurately present the data in any use and form, and (4) comply with applicable College policies, state and federal laws and regulations.

ADDITIONAL INFORMATION

N/A

EXCEPTIONS/EXCLUSIONS

N/A

REVIEW

This policy shall be reviewed every year. Upon such review, the President or President's designee may recommend that the policy be amended or repealed.

APPROVAL SIGNATURES

DocuSigned by:
Bonny B. Copenhagen
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President

06/11/2024 | 8:22 AM

Date

RELATED POLICIES, OTHER REFERENCES AND ADDITIONAL NOTES

N/A

ASSOCIATED FORMS

HISTORY		
REVISION DATE	DESCRIPTION OF CHANGE	VICE PRESIDENT APPROVAL
4/26/2024	Updated to adhere to the new College format. Some information was reorganized to adhere to new format headings. Some terms and definitions that have become general knowledge were removed for brevity. The scope of the policy was not changed. A one-year review cycle was established.	DJA

New River Community and Technical College expects all faculty, staff and students to be familiar with and adhere to all applicable college policies.