

Policy Name:	Administrative Data Collection, Access and Usage Policy
Originating/Responsible Department:	Information Technology Services & Enrolment Management
Approval Authority:	Senior Management Committee
Date of Original Policy	March 2022
Last Updated:	March 2022
Mandatory Revision Date:	March 2025
Contact:	Director, Information Security (ITS) & Assoc. VP, Enrolment Management

Introduction:

Carleton University's administrative systems encompass a diverse set of university functional areas. Administrative data is owned by the University and is a vital asset. The University is committed to maintaining and protecting the integrity of Personal Information and confidential information in its custody or control. The collection, access and use of administrative information is governed by the Access to Information and Privacy Policy, relevant government legislation and applicable contractual provisions. This policy defines the roles, responsibilities, and procedures to promote and support the responsible collection and secure use of administrative data.

Policy:

Requests to collect, access or use administrative data must seek approval in writing with an appropriate justification and be approved by the data custodian or designate to ensure data confidentiality and security. The coordination of this approval process is the responsibility of the Data Administration Working Group (DAWG).

Purpose:

The objective of this policy is to prevent unauthorized collection, use or access to confidential and/or sensitive administrative data, including personal information, without unnecessarily limiting university operations. This policy and approval process is designed to:

- Promote and support the responsible collection and secure use of administrative data
- Ensure appropriate access while protecting data privacy and security
- Ensure protection of personal information

Scope:

This policy applies to current Carleton University faculty, instructors, and staff members only.

This policy applies to all administrative data collected and stored by or on behalf of the university. This includes, but is not limited to, confidential and personal information of all Members of the University Community, as defined in the Access to Information and Privacy policy; student academic data; alumni,

finance and human resource data. This policy does not apply to personal health information, research data nor teaching and learning data. Such data are subject to other applicable policies, data protection laws and approval processes.

Data custodians are responsible for ensuring the security, access, accuracy and completeness of administrative data in their areas. The Executive Data Custodians of administrative data are:

Area of Responsibility	Executive Data Custodian
Human Resources (staff and faculty including contract employees)	Assistant Vice-President, Human Resources Provost and Vice-President (Academic)
Students (including student academic records)	Vice-President, Students & Enrolment and University Registrar
Finance	Assistant Vice-President, Financial Services
Campus Operations	Vice-President, Finance and Administration Vice-President, Students & Enrolment
Alumni	Chief Advancement & Community Liaison Officer
Board of Governors	University Secretary

The Executive Data Custodians of administrative data are responsible for:

- Establishment of policies and procedures for the collection, access and use of administrative data
- Assessing risks to administrative data assets and for ensuring the continued availability of information to support critical business processes and for internal decision making while complying with all applicable legal requirements
- Adjudicating requests for collection and access
- Delegating information custodians with decision rights

For more information about information custodians, please reference the Carleton University Retention Schedule (CURS) maintained by Corporate Records and Archives.

Procedures:

An individual or group wishing to request collection, access or use of administrative data outside of their area of responsibility will need to make a written request for this data. If the data is aggregate in nature, they should contact the Office of Institutional Research and Planning (OIRP) to determine if the data can be accessed through their services given their role and mandate in providing institution-wide administrative information. OIRP's mandate includes providing quantitative information and analysis and related professional services including defining, collecting and disseminating standardized statistics. (oirp.administrator@carleton.ca)

If OIRP is unable to fulfill the request, a request to the Data Administration Working Group should be made. The Data Administration Working Group's responsibilities include:

- Recommending policy and process improvements regarding governance of data in administrative systems.
- Receiving, assessing and providing recommendations to data custodians on requests for permission to collect, access and/or use confidential/sensitive data from administrative systems.

- Referring requests to the Carleton University Privacy Office when appropriate for completion of a Privacy Impact Assessment.
- Referring cross-functional requests to Senior Management Committee for approval.

A request form needs to be completed by Members of the University Community for requests to collect, access or use administrative data outside of their custodianship. Requests can be submitted electronically to the [Data Administration Working Group](#). The form can be found at the DAWG's website.

*Note: requests for the collection of personal information require the completion of a Privacy Impact Assessment through the Privacy Office in advance of the request to the Data Administration Working Group to ensure compliance with applicable policies and legal requirements.

Implementation, Review and Amendment

1. The Data Administration Working Group is responsible for periodic review of this Policy and making recommendations for possible amendments to the Senior Management Committee.
2. Amendments to this Policy other than those set out in paragraph (3) below shall require the approval of the Senior Management Committee.
3. Between mandatory revision dates. The Data Administration Working Group may amend this Policy in order to update the following information contained herein:
 - ☐ the designation, title or identity of officials, offices, or departments and contact information within the University;
 - ☐ the designation or title of government ministries or agencies;
 - ☐ the title or citation of legislation, regulations, policies or procedures.
4. The Data Administration Working Group may make exceptions to procedures for purposes of the effective implementation of this Policy, provided that such procedures or exceptions are consistent with the provisions of this Policy and all applicable legal requirements.

Contact:

Director, Information Security (ITS) &
Assoc. VP, Enrolment Management

Website: <https://carleton.ca/itgovernance/dawg/>

Links to Related Policies:

Secretariat Policies – <http://carleton.ca/secretariat/policies>

- Access to Information and Privacy Policy
- Corporate Records and Archives Policy
- Information Security Policy