DATA STEWARDSHIP

Section: Information Technology

Policy: University Housing data is managed to comply with legal and ethical requirements, as well as university policy. Select University Housing staff members have oversight over housing data in systems or storage locations containing non-directory, student information or other sensitive or restricted information. As a result, these select staff are the only ones who can release this data to someone who does not already have access to these systems for business-related purposes.

Purpose: This policy outlines requirements and considerations for granting and denying data requests submitted to University Housing.

Scope: This policy applies to all sensitive or restricted data managed by University Housing, which includes rosters of students who might have a FERPA restriction.

Background: Data assets are some of the most valuable assets owned by the University of Georgia, and University Housing produces, collects and uses many different types of data in fulfilling its mission. Laws and institutional policy mandate both the privacy and protection of certain types of data to manage risks to the university's constituents and its reputation.

For data management, specific individuals play defined roles based on their area of expertise to ensure UGA data is properly managed and secured. These are:
- Data Trustee – a cabinet-level position with overall responsibility for data being read, created, reported, updated or deleted by units under them. For University Housing data, the data trustee is the vice president for student affairs.
- Data Steward – a business owner with deep knowledge of their data domain and related business practices. They are accountable for approving access requests, maintaining data quality and developing meta data for the data they steward. For University Housing data, the data steward is the executive director of University Housing.
- Data Custodian – is designated by a data steward and is authorized to grant access to elements within the data domain for which the steward is accountable. For University Housing data, the custodian is a director.
- Data User – is an individual who has been authorized access to data or data systems.

Housing Systems and Data Oversight

Data Steward	Data Custodian	Data or System
Executive Director	Director of Administrative Services and Communications	StarRez/The Dawg House
Executive Director	Director of Administrative Services and Communications	Institutional File Storage (IFS) and Secure IFS
Executive Director	Director of Facilities	Key database
Executive Director	Director of Facilities	AiM
Executive Director	Director of Residential Programs and Services	Advocate

Additional information related to data use may be found on websites for UGA Data Access Policy, UGA FERPA Policy, UGA Privacy Policy, UGA Data Classification and Protection Standard, and Student Affairs Data Block Policy.

Procedure:

I.   Housing data shall be classified by the data steward and custodian in accordance with the Data Classification and Protection Standard to identify the level of confidentiality needs, legal requirements and minimum standard protection for the data before any access is granted.

II.   Requests for data within a particular system may be made to the appropriate data custodian (e.g., all requests for student rosters would be made to the director of administrative services and communications) via Jotform. For internal housing requests, the Jotform will be routed through the director level for approval prior to routing to the data custodian. Requestors must comply with the following standards:
   A.   The requestor must have a legitimate business need for the data and adequately define that need.
   B.   The requestor must supply the data custodian with the appropriate parameters and format for the data needed (e.g., type of data needed, student names/classification, when data is needed by).
   C.   The requestor must provide verification of current FERPA certification for the year in which the data is requested (if the data includes non-directory, student information or FERPA-restricted students).
   D.   The requestor must share who (besides themselves) might have access to the data and provide verification of FERPA certification for those individuals as well.
   E.   The requestor must only use the given data for the purposes originally defined.
   F.   The requestor must maintain the confidentiality of the data and ensure the data is stored responsibly and in compliance to UGA policy.

III.   The data custodian will review the request and confirm compliance with the standards listed in Section II.

IV.   Since access to sensitive or restricted data is officially approved by UGA-designated data steward, the custodian will notify the data steward of any requests for potential sensitive or restricted housing data.

V.   University Housing reserves the right to withhold data for students with an active FERPA restriction.

VI.   If access to the data is granted, the data custodian will work with the system technical or functional administrators on generating the particular data.

VII.   Authorized access to data to the data requestor does not imply authorization for further dissemination of said data.

VIII. Any requestors found to have violated the standards will have any access revoked and will not be provided information in the future. Employees may also be referred

through a performance management process, which could include a letter of counseling or warning, suspension without pay, demotion or termination.

IX.   Requests for records or potential sensitive information by legal entities should be referred to the University Housing representative in the Office of Legal Affairs. Other external entities should be referred to the [open records manager](#) in UGA's Division of Marketing and Communications.

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