

ONU Internal Data Sharing Guidelines and Processes

Recognizing that a) various units at ONU steward information relative to their tasks, b) sometimes that information is useful to other units, and yet c) transfer of data outside its home department carries risks, the University Data Committee (UDC) proposes the following guidelines and processes to govern data sharing between those employed by ONU.

The roles of *data steward* and *data user* are crucial to this document. The data steward (or just *steward*) is the unit who primarily manages the data and the system in which it is housed. More than likely, one person in that unit will bear responsibility at any one time for the data, but the concept of stewardship is applied to the unit, not to the person. The data user (or just *user*) is a person from another unit requesting access to the data in question.

Principles Guiding Internal Data Sharing

To facilitate ONU's functioning and protect all parties involved, internal data sharing should abide by the following principles:

- *Open*: The general inclination of a data steward should be willingness to share data with other units at ONU unless there is a compelling ethical, legal, and/or operational reason not to do so. This openness contributes to ONU fulfilling its mission.
- *Accurate*: Data stewards should take all reasonable steps to ensure that data is entered accurately and is passed on to others in a way that maintains that integrity. Both stewards and users should know enough about the context in which the data was produced to accurately understand its meaning.
- *Secure*: Data should be accessible only to those who, given their function at ONU, have need of it and have indicated they understand how to protect it. The requirements of FERPA, HIPAA, and/or any other relevant legislation must be followed by all parties in possession of ONU-related data, whether they represent the formal steward of the data or not.
- *Efficient*: It is in the interest of ONU to have streamlined procedures for working with data. While developing such procedures should never compromise security, units should consider ways to improve the efficiency of internal data sharing.
- *Timely*: While it is understood there may be minor delays in some situations (for example, the data may need to be updated before sharing, etc.), the data steward should provide requested data as soon as is reasonably possible. This allows the user's work to progress in a timely fashion. In addition, in some cases information will become obsolete if not shared and used promptly.

Data Request Process

1. The potential data user contacts the data steward with a written request (email or Teams message is acceptable) for the data. The request should include an explanation of the nature and purpose of the user's work with the data. Common purposes include internal research, assessment of programs/services, communication with various populations, marketing, etc. Data requested for research or other projects to be shared beyond the user's unit may need the approval of the Institutional Review Board (IRB) and therefore may be subject to guidelines and procedures beyond those detailed in this document.

2. The data steward assesses whether there is any legal or ethical reason to withhold the data, consulting with appropriate colleagues when needed. In cases where the data user does not need identifying information, the steward should remove such information. The steward may provide the data via any ONU system (e.g., OneDrive, Teams, etc.) that protects its safety and integrity.
3. The data steward should also provide enough consultation with the data user to be sure s/he understands the basic meaning and structure of the data, as well as legal, ethical, and/or practical limits on its usage.
4. If, in the process of their work, the data user decides they would like to use the data for a task not directly related to the original one, s/he should begin this process again at Step 1 with the new task in mind.
5. In cases where the steward and user disagree about whether the latter may access the data, the user may submit a request to UDC for adjudication of the issue.

Adjudication Process

1. The potential data user may ask the UDC for reconsideration of their unsuccessful request for access. This request should be submitted in written form (email is acceptable) to the Chair¹ of the UDC and include a description of the data sought, the reason for seeking it, and identification of both the unit that is the data steward and the data steward representative(s) with whom the user was in contact.
2. Upon reception of the user's appeal, the Chair will contact the data steward and ask for a written explanation of why the data request was denied.
3. The Chair will forward these documents to all members of the UDC, who will have one week to submit any clarifying questions. At the same time, the Chair will schedule a UDC meeting for no more than 2 weeks from the date documents were forwarded. Timelines and urgent requests submitted by the data user will be taken into consideration and the Chair may request an expedited timeline if there is sufficient reason to do so.
4. The Chair will contact appropriate parties with any questions raised in Step 3. Those parties will have two business days to answer, and their responses will then be passed on the UDC.
5. The UDC will meet about the appeal and vote on whether to provide the user the requested data. Within two business days, the Chair will provide a written decision to both the potential data user and the data steward.

¹ Current list of UDC members available under Standing Committees at [Academic Affairs](#) on the portal.