

USC Data Privacy Advisory Committee Charter

Principles:

The Data Privacy Advisory Committee (DPAC) is intended to further the university's approach to developing and maintaining effective compliance programs across various risk areas. The DPAC will support the data privacy program by advising the Office of Culture, Ethics and Compliance (OCEC) on plans and programs to (1) help USC faculty, staff, and students understand and comply with applicable laws, rules, and policies covering privacy and related issues; (2) prevent and detect violations of law, regulations, and university privacy policies; and (3) periodically assess compliance risks in the area of data privacy and advise on core mitigation strategies.

The following areas are important elements for effective compliance programs and therefore are to be considered by the DPAC as it provides input regarding USC's overarching data privacy compliance program:

- Culture, Governance and Compliance Oversight
- Compliance Risk Identification and Assessment
- Policies, Standards and Systems
- Education, Training and Outreach
- Monitoring, Auditing and Program Evaluation
- Investigations, Corrective Action and Enforcement

Committee Responsibilities

The **Vice President, Office of Culture, Ethics, and Compliance** provides leadership and direction on USC's compliance programs and initiatives.

The **Assistant Vice President, Institutional Compliance, Office of Culture, Ethics, and Compliance** works across USC and with key stakeholder to develop and implement comprehensive compliance area programs such as Data Privacy that meet the elements of effective and efficient programs including, but not limited to training, policies, monitoring, data analytics and reporting.

The **Director of Data Privacy** is accountable for establishing and maintaining the USC data privacy program; reviewing compliance with regulatory, statutory, policy, and procedural requirements related to the collection, use, and disclosures of data. The Director of Data Privacy collaborates with various offices to assist them with their data privacy compliance obligations, and closely interfaces with them on mutual concerns.

Under the leadership of the OCEC, the DPAC will:

1. Recommend and advise on data privacy policies, procedures and guidance documents, comment on their operational impact, and provide implementation recommendations.

2. Identify data privacy risks and collaborate on risk mitigation and remediation activities.
3. Provide recommendations and comments on data privacy education, training, and outreach activities to address:
 - a. Identified risks and concerns.
 - b. Policy changes and operational implementation to promote workforce members' comprehension and adherence.
4. Monitor and report on data privacy statutory and regulatory updates.
5. Collaborate and advocate on policy and operational changes that may impact data privacy practices across the USC community.
6. Partner with other USC workgroups and committees to affect unified data privacy activities, policies, education and training, etc.

Governance

The committee members will be confirmed on an annual basis and changes to the membership may be made from time to time. Representatives from the following key areas/functions will comprise the core members:

- Academic Records and Registrar
- Academic Senate
- Admissions
- Advancement
- Auxiliary Services
- Business Services (Purchasing and Contracts)
- Financial Aid
- Human Resources
- Information Security
- Keck Medicine – Healthcare Compliance
- Office of the General Counsel
- Office of Research
- Office of Culture, Ethics, and Compliance
- School of Dentistry
- Staff Assembly
- Strategic and Global Initiatives
- Treasury Services

The committee shall meet quarterly, or more frequently, to respond to regulatory/policy-related changes.