# ***Privacy by Design: Monitoring Policy (Week 2)***

## **Principles Summary**

**Notice/Consent:** This principle means individuals should be informed about data collection or monitoring practices and their consent should be obtained (or at least implied by their use of the system).

**Purpose Limitation:** Data and monitoring should only be used for specific, legitimate purposes that have been clearly defined, and not for any unrelated purposes.

**Data Minimization:** Only the minimum necessary information should be collected and retained to fulfill the stated purpose, avoiding any collection of unnecessary data. **Proportionality:** The scope and methods of monitoring must be balanced and not excessive relative to the legitimate aim – in other words, any privacy intrusion should be justified by a corresponding necessity or benefit.

## **My Monitoring & Retention Clause**

Hocking College monitors the use of its computing systems, networks, and electronic communications by students and employees to protect operations and ensure compliance with college policies and legal requirements. Monitoring activities are strictly limited to authorized purposes and are conducted only by designated personnel within an approved scope. Users are informed of these practices through login notices and the Acceptable Use Policy. By using college systems, they consent to such monitoring. The college does not examine personal communications or files unless required by law or as part of an incident investigation.

Hocking College is committed to data minimization in its monitoring efforts, collecting only the minimum information necessary for these purposes. Access to monitoring data is restricted to trained staff on a need-to-know basis. Monitoring data is stored securely for 28 days and then deleted, unless an active investigation or legal requirement necessitates keeping it longer. Individuals can raise questions or appeal monitoring practices by contacting the IT department or the appropriate college office, and the college will address these concerns. Any policy violations discovered through monitoring may result in loss of system access and disciplinary action in accordance with college procedures.

## **Justification**

This monitoring and retention clause was guided by the principles of notice & consent, purpose limitation, data minimization, and proportionality. For example, it provides clear **notice** (users are informed via login banners and policies) and **consent** (implied by using the system), confines monitoring to specific **authorized purposes**, and emphasizes **data minimization** (collecting only what is necessary) as well as limited retention. These align with widely accepted privacy guidelines such as the GDPR’s principles of transparency, purpose limitation, data minimization, and storage limitation[[1]](https://www.hfw.com/insights/ico-publishes-guidance-on-monitoring-workers/#:~:text=4,%E2%80%9CWhat%20do%20we%20need%20to). By incorporating these principles, the clause seeks to protect individual privacy while allowing necessary monitoring for security and compliance.

**Reflection**

If I were to tighten this policy further, one area would be the **data retention length**. For example, reducing the default retention from 28 days to perhaps 14 days could better minimize stored data, though this must be balanced with giving IT enough time to detect and investigate incidents. I might also strengthen the **appeals process** by outlining a clearer procedure for individuals to challenge or review monitoring decisions (e.g., a formal review by an independent officer if someone believes they were unfairly monitored). These changes would enhance privacy and transparency for students and staff – making them feel their data is handled with even greater care – but could require more effort from the college (such as faster investigations and managing an appeal/review process). Overall, such adjustments would further align the policy with privacy-by-design principles and build trust among stakeholders that monitoring is conducted fairly.

## **AI Use Note**

I used an AI writing assistant (ChatGPT) to help brainstorm and refine the wording of this policy. I provided the AI with the key privacy principles and my draft clause, and asked for suggestions to clarify definitions and strengthen the clause. The AI’s suggestions were then carefully reviewed and edited by me to ensure accuracy, proper tone for Hocking College, and compliance with the assignment requirements.

**Reference**

ICO Publishes Guidance on Monitoring Workers - HFW

<https://www.hfw.com/insights/ico-publishes-guidance-on-monitoring-workers/>