

## AACSB Accreditation and the General Data Protection Regulation (GDPR)

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### About the GDPR

The General Data Protection Regulation (GDPR) is a framework designed to give EU citizens more control and protection over their personal data. Two key principles of the GDPR are 1) personal data must be collected for specified, explicit and legitimate purposes; 2) companies collecting personal data are obliged to protect it from misuse. Any organization that either operates in the EU or does business with customers in the EU is required to comply with the GDPR.

While there remains a degree of uncertainty over what is meant by personal data, essentially any data which could identify a subject is protected by the regulation. Examples include name, ID number, physical address, and email address. Organizations required to comply with the GDPR fall into one of 2 categories:

1. **Controller:**

"Controller" means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by EU or Member State laws, the controller (or the criteria for nominating the controller) may be designated by those laws.<sup>1</sup>

2. **Processor:**

"Processor" was defined under the Directive as a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.<sup>2</sup>

AACSB falls into the Processor category and therefore is required to comply with certain aspects of the GDPR.

### Impact of GDPR on AACSB Accreditation

Member organizations submit personal data relating to business and professional matters to AACSB when participating in certain AACSB activities. In the context of accreditation, AACSB collects personal data for legitimate business purposes, namely to assess alignment with certain accreditation standards. Examples of personal data that may be collected for accreditation purposes include:

- a) Table 3-1
- b) Faculty CVs
- c) Intellectual contributions
- d) Assurance of learning data
- e) Reports may include other personal data such as names on visit reports, in the signature line included on some of the templates, or in the gap analysis which includes a column for the name of the individual responsible for the action.

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<sup>1</sup> GDPR Article 4(7)

<sup>2</sup> GDPR Article 4(8)

Additional information on these items is provided below.

Item	Personal Data Collected	Purpose	Suggestions to Schools and AACSB Volunteers
Table 3-1	Name, date of appointment to school, year degree earned	To assess faculty sufficiency and qualifications of the school.	Schools may consider providing Table 3-1 to AACSB and accreditation volunteers on a password-protected site. We have some schools that have done this and provide AACSB and the team members access for a predetermined period of time (from the time the report is due through the conclusion of the visit). Some schools have also removed names from Table 3-1 or assigned a numeric identifier, with only the school knowing which numbers are assigned to faculty members. Any of these options are ways in which schools can more prudently control the personal data they are sharing for accreditation purposes.
Faculty CVs	Name, school information, e-mail address, physical address	To verify the qualifications of faculty members at the school.	Schools are not required to submit CVs to AACSB or its committees. Most peer review teams and mentors will review CVs onsite, at the time of the visit. Schools may elect to only have this information available to a team or mentor onsite, versus providing it electronically. There may be times when having access to the CVs prior to the visit is helpful to a peer review team. In such cases, schools may consider providing this information on a password protected site, similar to what was described above.

Item	Personal Data Collected	Purpose	Suggestions to Schools and AACSB Volunteers
Intellectual Contributions	Name, school information, email address	To verify the accuracy of the information provided in the faculty CV.	Intellectual contributions are not required to be provided in advance to AACSB or its accreditation volunteers. Schools should have sample intellectual contributions available onsite, but such documentation does not need to be sent electronically with accreditation reports.
Assurance of Learning (AoL) Student Data	Student and faculty names	To validate summary data provided by the school on student outcomes achievement.	Student work used for AoL purposes is not required to be provided in advance to AACSB or its accreditation volunteers. Schools should have sample student artifacts available onsite, but such documentation does not need to be sent electronically with accreditation reports.
Visit Schedule	Names of individuals participating in meetings	To describe the structure of the visit and meetings that were held to AACSB and operating committees.	Schools may simply include the name of the group which was met with as opposed to listing specific names. Examples include: Curriculum Committee, Leadership Team, Tenure/Tenure-Track Faculty.

### AACSB's Commitment to GDPR

While the GDPR identifies some new privacy concepts, much of the foundation has already been established at AACSB through existing compliance activities that ensure alignment with our internal compliance standards, and other laws and industry best practices. AACSB has been working diligently to align relevant practices with the GDPR in the delivery of our member services. In response to the GDPR, AACSB has introduced the following measures:

1. Enhancing notices to ensure additional transparency is provided to members on the types of data collected and uses of the data.
2. Reviewing and updating agreements with our members and third parties with whom we may share personal data, ensuring their commitment to data protection. AACSB now has a Data Processing Agreement which is available upon request.
3. Creating new artifacts and documentation to support our alignment to the various requirements of the GDPR as best practices. AACSB will soon require all accreditation volunteers to sign an agreement assuring the confidentiality of the personal data shared as part of the accreditation review.

The responsible handling and security of member data remains a high priority for AACSB. Please direct any questions to [privacy@aacsb.edu](mailto:privacy@aacsb.edu).