

Policy Owner:	Chief Information Officer
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Information Stewardship Policy

1 Purpose

This policy sets forth the core principles and overall framework for information stewardship at Rensselaer Polytechnic Institute.

2 Scope

This policy applies to all employees, students, and third-party individuals who create, update, access, transfer, or otherwise handle institutional data.

2.1 Relationship to Other Policies

This is an Institute-wide policy and supersedes all other Institute-wide policies relating to the subject matter. This policy may allow for individual units (divisions, departments, offices, etc.) to establish local standards or policy, but such unit-level standards and policy must be consistent with the requirements of this policy.

This policy refers to and includes by reference the Rensselaer *Information Classification Policy* and the Rensselaer *Records Retention Policy*.

3 Policy

Rensselaer Polytechnic Institute and members of the Rensselaer community are expected to responsibly manage and use information in support of research, teaching, service, and administration. All information that is created, collected, licensed, maintained, recorded, used, or managed by the Institute, its employees, and agents working on its behalf, regardless of ownership or origin, is institutional data. The electronic and physical systems owned or licensed by Rensselaer used to store and access institutional data are institutional systems. Members of the Rensselaer community are expected to responsibly maintain and use institutional data regardless of the resource used to access or store the data—whether an institutional system, a privately owned resource, or a third-party resource. The privacy of the personal information of Rensselaer community members and clients should be protected.

This policy and suite of accompanying policies, procedures, and resources will help ensure that Rensselaer’s institutional data and systems are protected from misuse, unauthorized access, damage, alteration, or disclosure, while preserving the ability of authorized individuals to access and use institutional data and systems for appropriate Rensselaer purposes. Members of the Rensselaer community working with or using institutional data and systems in any manner must comply with all federal, state, and other applicable laws and regulations; all applicable Institute policies, procedures, and standards; and all applicable contracts and licenses.

4 Implementation

4.1 Roles and Responsibilities

Information Owners. Generally speaking, Rensselaer Polytechnic Institute is the information owner of institutional data. Faculty members are often information owners of their faculty materials.

Information owners have the right and responsibility to manage and use institutional data appropriately, as defined by all applicable laws and regulations; Institute policies, procedures, and standards; and contracts and licenses.

Information owners may delegate the responsible management of their institutional data to information managers.

Information Managers. The individuals charged by information owners to ensure the responsible management and use of institutional data.

Information managers are typically senior administrators, deans, and directors. Faculty members are the information managers of their faculty materials.

Information managers make the decisions and take the actions on behalf of the information owners needed to ensure the responsible and appropriate management and use of institutional data. Typical responsibilities of information managers include, but are not limited to:

- Establish appropriate information management policies and procedures;
- Identify the laws and regulations; University policies, procedures, and standards; and contracts and licenses that affect the institutional data under his or her care;
- Document retention requirements to meet regulatory and business requirements for information, and identify information destruction requirements to limit risks arising for retention beyond regulatory and business requirements.
- Identify the classification of institutional data under his or her care;
- Determine the appropriate access and use of institutional data under his or her care;
- Provide communications and education to information users on the appropriate use and care of institutional data;
- Work with information custodians to establish and maintain trustworthy information systems.

In most cases, institutional data may have multiple information managers with responsibilities distributed among the information managers based on role and responsibilities within the Institute.

Information managers may delegate some management activities to information custodians, usually for reasons of efficiency and effectiveness. Information managers may also appoint **information stewards** to undertake activities for the manager, including, but not limited to, surveying the location and state of information, developing and implementing information policies and procedures, and implementing protective measures.

Information Custodians. The entities or individuals charged by information managers to execute aspects of managing institutional data.

Information custodians are typically IT units that maintain and operate institutional systems in order to manage institutional data on behalf of information managers.

Information custodians make the decisions and take the actions needed to support the management function delegated by the information managers to the information custodians. Information custodians' decision-making, actions, and responsibilities are limited to those delegated functions. Typical responsibilities of information custodians include, but are not limited to:

- Maintain and operate institutional systems;
- Ensure that institutional systems have the safeguards in place that are commensurate with confidentiality level of the institutional data held or accessed by the institutional systems;
- Manage access to institutional data appropriately;
- Follow and implement information policies and procedures.

Information Users. Individuals that access and use institutional data in support of their research, teaching, service, and administrative work.

Typically, information users are faculty, staff, and affiliates.

Information users have the responsibility to access and use institutional data in an appropriate and compliant manner as defined by the information managers. In particular, information users have the responsibility to protect the personal information of information subjects in the institutional data they are accessing and using.

Information Subjects. The individuals that have information about them in institutional data.

Nearly all members of the Rensselaer community—students, faculty, staff, affiliates, alumni, and donors, plus non-matriculated students—are information subjects.

Information subjects have the right to expect that information users, custodians, managers, and owners will manage and use the institutional data that contains information about them in an appropriate and compliant manner. In particular, information subjects have the right to expect that information users, custodians, managers, and owners will use reasonable efforts and resources to protect the subject's personal information.

4.2 Information Classification

Classification of institutional data informs and guides proper information stewardship. For Rensselaer, this is formally described in the Rensselaer *Information Classification Policy*.

4.3 Information Retention

The retention of institutional data is governed by regulation or other legal requirement and by business necessity. Information managers are responsible for establishing information retention and information destruction requirements. These requirements are collected and maintained in the Rensselaer *Information Retention and Destruction Policy*.

5 Compliance

In addition to any possible legal sanctions, violators of this Policy may be subject to disciplinary action up to and including dismissal or expulsion, pursuant to Institute policies, codes of conduct, or other instrument governing the individual's relationship with Rensselaer. Recourse to such actions shall be as provided for under the provisions of those instruments.

6 Approval

This policy is approved under the authority of the President of Rensselaer Polytechnic Institute.

{original signed}

June 27, 2017

Signature

Date

Dr. Shirley Ann Jackson

7 Acknowledgements

The production of this policy borrowed heavily from other sources, including Tufts University and the SANS Institute.

8 Revision History

11/22/2016 – Initial version released for comment.