

Information Classification and Handling Policy

Purpose

This policy establishes a framework for classifying the confidentiality level of *institutional data*. It also establishes the requirements for maintaining the integrity and availability of *institutional data*.

Scope

All members of the Tufts community.

Policy Statement

This policy provides a four-level classification scheme for the confidentiality of *institutional data* and establishes the requirements to maintain the integrity and availability of *institutional data* regardless of its ownership or origin.

Confidentiality

This policy establishes four levels of confidentiality for *institutional data*. All members of the community must understand the level of confidentiality for *institutional data* under their care. All members of the community must manage *institutional data* under their care with safeguards that are commensurate with the *data's* level of confidentiality and the harm that would result from improper handling. This includes implementing and operating *institutional systems* that support the confidentiality of the *institutional data* under their care.

Confidentiality Level	Description	Consequences of Unauthorized Disclosure	Examples
Level A: Regulated Institutional Data	All <i>Institutional data</i> that is governed by privacy or information protection requirements articulated by law, regulation, contract, binding agreement, or industry requirements.	Some of the consequences may include: legal sanctions for Tufts, violations of personal privacy, reputational and financial loss.	Examples include, but are not limited to personal, financial, or other types of records with social security numbers or financial account information—essentially any information unauthorized individuals can use to steal identities or financial resources—governed by Massachusetts data privacy regulations. Student records governed by FERPA. Records with protected healthcare information governed by HIPAA. Credit card data governed by PCI data security standards, data use agreements for research, data covered under FISMA, information covered by nondisclosure agreements and other formal usage arrangements.
Level B: Confidential Institutional Data	<i>Institutional data</i> that is meant for a very limited distribution—available only to members of the Tufts community on a strictly need-to-know basis.	Some of the consequences may include: violation of personal privacy, reputational and financial loss, or a competitive disadvantage for Tufts.	Examples include, but are not limited to personnel files, compensation data, tenure and promotions files, accounts payable records, vulnerability and audit reports, research notes documenting the development of a patentable invention.
Level C: Administrative Institutional Data	<i>Institutional data</i> that is meant for a limited distribution; available only to members of the Tufts community that need the <i>institutional data</i> to support their work. This <i>institutional data</i> derives its value for Tufts in part from not being publically disclosed.	Some of the consequences may include: reputational and financial loss, a hindrance to productivity, or a competitive disadvantage for Tufts.	Examples include, but are not limited to internal memos and emails, planning documents, logs, audit trails.
Level D: Public Institutional Data	<i>Institutional data</i> that is meant for members of the Tufts community and in some cases wide and open distribution to the public at large. This <i>institutional data</i> does not contain regulated or confidential information.	Some of the consequences may include: violating license agreements, loss of access to subscription resources, or a financial loss for Tufts.	<i>Limited to Tufts Community</i> Licensed library resources, licensed software. <i>Wide and Open Distribution</i> Publications, press releases, information posted on and meant for open websites.

Integrity

All *information owners, managers, and custodians* are responsible for maintaining the integrity of the *institutional data* under their care, ensuring that the *data* is complete and unaltered in all essential respects. *Information managers and custodians* are responsible for implementing and operating *institutional systems* that support the integrity of the *institutional data* under their care.

Availability

All *information owners, managers, and custodians* are responsible for maintaining the availability of the *institutional data* under their care to persons who are permitted to use such data, ensuring the *data* is retrievable, deliverable, and understandable. *Information managers and custodians* are responsible for



implementing and operating *institutional systems* that support the availability of the *institutional data* under their care.

Policy Violation

Depending on the circumstances, and in management's sole discretion, members of the Tufts community who violate this policy may be denied access to *institutional data* and *systems*, and may be subject to other penalties and disciplinary action, both within and outside of the University. The University may refer suspected violations of applicable law to appropriate law enforcement agencies.

Review Entities

Information Stewardship Committee
Information Technology Advisory Council
Information Technology Leadership Forum
University Library Council
Institutional Compliance Executive Committee

Approval Date

September 15, 2011

Effective Date

September 20, 2011; revision November 6, 2012

Executive Sponsor

David Kahle, Vice President for Information Technology and Chief Information Officer

Policy Managers

Tufts Technology Services
Digital Collections and Archives
University Counsel

Responsible Offices

For general questions about the policy

- Tufts Technology Services
- Digital Collections and Archives
- University Counsel

Contact infopolicy@tufts.edu.

Revision

The University reserves the right to change this policy from time to time. Proposed changes will normally be developed by the policy managers with appropriate stakeholders. The review entities have sole authority to approve changes to this policy.



Distribution

http://it.tufts.edu/sites/default/files/information-classification-handling_2011-09-16.pdf

Related Policies

Information Stewardship Policy

Use of Institutional Systems Policy

Information Roles and Responsibilities Policy

University Records Policy