

## **Information Security Policy**

The purpose of this policy is to ensure the protection of Regina Webb Academy's information resources from accidental or intentional access or damage while also preserving and nurturing the open, information-sharing requirements of its academic culture.

This policy is applicable to all students, faculty, and staff and to all others granted use of Regina Webb Academy information resources. Every user of Regina Webb Academy's information resources has a general responsibility to protect those assets, while some offices and individuals have specific responsibilities.

This policy refers to all college information resources whether individually controlled or shared, stand-alone or networked. It applies to all computer and communication facilities owned, leased, operated, or contracted by the college. This includes all networked devices, including but not limited to personal digital assistants, cell phones, personal computers, workstations, minicomputers, other wireless devices such as iPads, and any associated peripherals and software, regardless of whether used for administration, research, teaching or other purposes.

Today, information technology (IT) permeates all aspects of teaching, learning, research, outreach and the business and facilities functions of the college. Safeguarding information and information systems is essential to preserving the ability of the college to perform its mission and meet its responsibilities to students, faculty, staff, and the citizens whom it serves. State and federal statutes, rules, and regulations, college policies and other explicit agreements also mandate the security of information and information systems. Failure to protect the college's information technology assets could have financial, legal, and ethical ramifications.

Regina Webb Academy acknowledges its obligation to ensure appropriate security for information systems in its domain of ownership and control. Furthermore, the college recognizes its responsibility to promote security awareness among the members of the Regina Webb Academy community. This policy establishes the general principles of information security that will be applied throughout the college.

### **Responsible office**

Information Technology Services

### **Responsible party**

Vice President – Angela Webb

### **Last revision**

November 2019

**Approved by**

President – Regina Webb

**Approval date**

November 2019

**Effective date**

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**Last review**

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**Additional references**

FERPA

**Scope**

All financial and administrative policies involving community members across campus are within the scope of this policy. If there is variance between departmental expectations and the common approach described through college policy, the college will look to the campus community to support the spirit and the objectives of college policy.

**Policy****Authorities Delegated and Retained/Administrative Responsibility**

The President of the College delegates administration of the college's Information Security Policy to the Vice President.

**Information Security Objectives**

Information security is critical to the interests of the college and the many constituencies it serves. The following list provides some of the objectives of information security at Regina Webb Academy. This list is representative and is not meant to suggest the full range of objectives of the college's information security policy or program.

- **Support and maintain the ongoing functions of the college.** As an increasing percentage of the college's functions are handled electronically. It is critical that information and information systems be protected so the college can operate without interruption.
- **Protect college assets.** The college is in possession of many assets including intellectual property, research and instructional data systems, as well as physical assets. Loss of these assets could have significant financial impact as well as major negative impact on critical research and instructional programs.

- **Safeguard the privacy of individuals and information.** With the increasing risk of identity fraud and other potential misuses of personal information, it is paramount that the college safeguard personal information entrusted to its stewardship.
- **Safeguard financial transactions and electronic communications.** The college is the custodian of financial records and transactions; safeguarding these records is critical to maintaining trust relationships essential to our business function.
- **Protect the integrity and reputation of the institution.** Security breaches reflect negatively on the capability of the college to manage entrusted resources. In addition, security breaches could result in the potential for criminal or civil action.
- **Prevent the use of college systems for malicious acts.** The college must prevent the use of Regina Webb Academy systems and infrastructure for malicious acts against its own systems as well as attacks against other individuals and organizations.
- **Comply with state and federal laws.** State and federal laws and regulations require the college to take reasonable steps to ensure the security of the data. Failure to safeguard this information could result in the legal action or cause the college to lose its ability to offer services.

## **Responsibility and Accountability**

### *Chief Technology Officer*

The college's Chief Technology Officer (CTO – Regina Webb) has overall responsibility for the security of the college's information technologies. Implementation of security policies is delegated throughout the college to various college services, departments and other units; and to individual users of campus information resources.

### *Information Security Officer*

The Information Security Officer (ISO – Angela Webb) is responsible for providing interpretation of this and other related policies, disseminating related information, and enforcing information security policies across campus.

### *College Services*

Officers within the college have the primary responsibility and authority to ensure Regina Webb Academy meets external and internal requirements for intellectual property, research and institutional data, privacy and security of confidential and business information. Multiple departments are responsible for general security issues (legal issues, security compliance, physical security, communications, and IT

infrastructure security). These individuals or departments are responsible for assisting in the development of college information security policies, standards, and best practices in their areas of responsibility. They are also responsible for advising departments and individuals in security practices related to areas they oversee, as follows:

- Personnel information and confidentiality - Human Resources
- Student information and confidentiality – Administrative Office
- Financial information and transactions - Finance and Administration
- Student loan information - Financial Aid
- Infrastructure, communication, and systems security and audit - ITS
- Other information - Information Security Officer

### ***Departments and Other Units***

Departments and other units are responsible for the security of any information they create, manage, or store, and for any information they acquire or access from other college systems (i.e. student records, personnel records, business information).

*Note: The security of applications and data administered by departments and individuals outside of the ITS: Division is the responsibility of the administering department. ITS: staff will provide advice and support for implementing security measures when requested.*

### **Data Management**

#### ***Data Access***

Students, faculty, and staff who use personally-owned systems to access college resources are responsible for the security of their personally-owned computers and other network devices and are subject to the following: the provisions of the college's security policies, standards and guidelines for best practices for users of college computing and network facilities as well as all other laws, regulations, or policies directed at the individual users.

#### **(1) Unauthorized Account or System Access**

- You may not access or use, or attempt to access or use, any computer accounts other than your own assigned account or any computer system for which you have not been granted access. In

other words, users should use only their own files, those that have been designated as public, or those that have been made available to them with the knowledge and consent of the owner.

- *Users may not access computers, software, data or information, or networks without proper authorization, regardless of whether any damage is done or whether the computer, software, data, information, or network in question is owned by the college.*

(2) Campus community members all share in the commitment to safeguarding the college's data. The college will rely on the principle of 'least privilege' in granting access to data and information.

- Initial access to data and information must be authorized by the appropriate Data Steward;
- Campus community members' access needs may change due to a new position, changes in responsibilities in an existing position, or termination. Human Resources and ITS: shall collaborate to ensure appropriateness of ongoing access;
- Privileged users' (system administrators, database administrators) access to data shall be periodically reviewed to ensure that access to data remains appropriate;
- On occasion, the campus community needs to provide external individuals or groups (auditors, contractors, vendors) with access. In those instances, an access start date and an access termination date shall be simultaneously identified. Should a need for access beyond the termination date arise, the Data Steward or designee initially approving access should be consulted.

### ***Operational Controls to Provide Effective Security***

The college controls internal access by segregating the entities gaining access, approving access, and provisioning access. Access is eliminated when an entity separates from the college.

### ***Reporting Information Security Incidents***

Reporting incidents is an ethical responsibility of all members of the Regina Webb Academy community. All the information related to information security incidents should be reported promptly to the ITS

### ***Loss of Computing Privileges/Disciplinary Implications***

Protecting the security of college information and information systems is the responsibility of every member of the college community. Each student, faculty, and staff is responsible for understanding and complying with all current and future approved IT policies and procedures including this Information Security Policy. Failure to comply with these policies may result in loss of computing privileges and/or

disciplinary action, up to and including termination. Examples of noncompliance include, but are not limited to:

- Inappropriately accessing and/or using college data;
- No person may store or use programs on college-owned systems that violate or hamper another person's use of computing resources. Examples of such programs are ones that attempt to obtain another user's password, acquire another user's files, circumvent system security measures, or crash the computer system.

## **Procedures**

### **Education**

Creating a heightened awareness of the importance of information technology security is an important component in establishing an environment in which each individual feels responsible and empowered to act in his/her own and the community's best interests. All departments will provide opportunities for individuals to learn about their roles in creating a secure IT environment.

### **Definitions**

**Security** – the state of being free from unacceptable risk. Thus information security focuses on reducing the risk of computing systems, communications systems, and information being misused, destroyed, modified or disclosed inappropriately either by intent or accident.

**Standalone** – a computer that is not connected to a network.

**Networked Resources** – refer to forms of data, information and hardware devices that can be accessed by a group of users through the use of a shared connection.

**Data Classification Levels** - The classification level assigned to data will guide Data Stewards, Data Custodians, Data Consumers, business and technical project teams, and any others who may obtain or store data, in the security protections and access authorization mechanisms appropriate for that data. Such categorization encourages the discussion and subsequent full understanding of the nature of the data being displayed or manipulated. Data is classified as one of the following:

**Sensitive:** Protection of this data is required by state and/or federal law and/or by Regina Webb Academy policy. Access to “sensitive” data must be controlled from creation to destruction, and will be granted only to those persons affiliated with Regina Webb Academy who require such access in order to perform their job, or to those individuals permitted by law. The confidentiality of data is of primary importance, although the integrity of the data must also be ensured. Access to sensitive data must be authorized in accordance with the college’s most current divisional authorization schedule.

**Confidential:** Access to “confidential” data must be requested from, and authorized by, the Data Steward who is responsible for the data. Data may be accessed by persons as part of their job responsibilities. The integrity of this data is of primary importance, and the confidentiality of this data must be protected. Examples of confidential data include purchasing data, financial transactions that do not include restricted data, information covered by non-disclosure agreements and library transactions. Access to confidential data must be authorized in accordance with the college’s most current divisional authorization schedule.

**Public:** Access to “public” institutional data may be granted to any requester. Public data is not considered confidential. Examples of public data include published directory information and academic course descriptions. The integrity of public data must be protected, and the appropriate steward must authorize replication of the data.

**NOTE:** Even when data is considered public, it cannot be released (copied or replicated) without appropriate approvals.

**Data Integrity** - The accuracy and consistency of stored data, indicated by an absence of any variance in data between two updates of a data record.

**Data Custodians** - ITS: or computer system administrators responsible for the operation and management of systems and servers which collect, manage, and provide access to college data. Data custodians must be authorized by the appropriate data owner or the Vice President.

**Data Steward** – the member of management who coordinates with ITS: on access to and safeguarding of data and information.

**Least Privilege** – user access is limited to resources needed to perform work for the college.

**Intrusion prevention** - process of performing intrusion detection and attempting to stop detected possible incidents

**Intrusion detection** – process of monitoring computer system or networks for unusual events and analyzing them to determine if an incident has occurred.

**Encryption** – the use of an algorithm to transform data into a form where the content is masked and can only be viewed by those having a key or other confidential means to reveal the data.