



Data Classification Standard

Responsible Office: Technology Services

Initial Approval: 02/06/2012

Current Revision Approved: 09/06/2017

Standard Statement and Purpose

This document provides the classification requirements for all data generated, processed, stored, transmitted, or used by all VCU faculty, staff, contractors, and third party business partners on behalf of VCU. This document is not intended to be used with data that is personally owned by individual employees, where if lost or stolen, has no negative impact on VCU.

This document is intended to be used by VCU Data Stewards to determine the sensitivity of the data used within their environment.

This document should be used in conjunction with the documents listed in the Related Documents Section.

Noncompliance with this Standard may result in disciplinary action up to and including termination. VCU supports an environment free from retaliation. Retaliation against any employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.

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Who Should Know This Standard

All persons that generate, store, process, transmit or handle VCU (university) data and information should read and familiarize themselves with this standard and its contents and provisions. Additionally, all Trustees, Data Stewards, and Data Custodians should read and familiarize themselves with this standard and its contents and provisions.

Definitions

Category I Information/Data

Information protected under federal, state or industry regulations and / or other civil statutes, where if lost may require breach notification and cause potential regulatory sanctions, fines and damages to the institution's mission and reputation. (Confidential and Regulated data)

Category II Information/Data

All proprietary information that if improperly released has the potential to cause harm to the institution, its mission or its reputation, but do not require breach notifications, and security or privacy of such data is not regulated or required by law or contract. Such data includes proprietary and properly de-identified research information, business related email or other communication records, financial information, employee performance records, operational documentations, contractual information, intellectual property, internal memorandums, salary information, and all other information releasable in accordance with the *Virginia Freedom of Information Act* ([Code of Virginia 2.2-3700](#)). (Sensitive data)

Category III Information/Data

All non-proprietary data that is considered publicly available for unrestricted use and disclosure, where if lost or illegitimately modified, these data will generate no negative impacts to individual departments, schools, colleges, or the institution as a whole. Such information is available to all members of the university community and to all individuals and entities external to the University community. Such data can make up public website information, public press release, public marketing information, directory information, and public research information. (Public Data/Information)

Data Custodian

An individual or organization in physical or logical possession of data for data stewards. Data custodians are responsible for protecting the data in their possession from unauthorized access, alteration, destruction, or usage and for providing and administering general controls, such as back-up and recovery systems. The data custodians are directly responsible for the physical and logical security of the systems that are under their control.



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Data Handling

Data handling encompasses actions such as the generation, view, use, modification, deletion, or destruction of data. It also relates to the transfer or transmission of data from one location to another.

Data Steward

The data steward is a University director or equivalent position who oversees the capture, maintenance and dissemination of data for a particular operation. The data steward is responsible to ensure data quality, develop consistent data definitions, sensitivity classifications, determine data aliases, develop standard calculations and derivations, define security requirements, document all appropriate “business rules” and monitor data quality within the source system and/or data warehouse. The data steward is also responsible for communicating data protection requirements to the data custodian; defining requirements for access to the data.

Data Trustee

Data Trustees will carry out plans and policies to implement guidance from the Data and Information Management Council. Data trustees are high-level employees (e.g., vice presidents, vice provosts, and deans) appointed by and reporting to the President, including but limited to Provost and Senior Vice President of Academic Affairs, Vice President of Finance, Vice President of Administration, Vice President of Research, or Senior Vice President of Health Sciences.

Information Storage and Handling

Within the context of this document, information storage and handling refers to actions that create, store, transmit, process, modify, destroy, and / or archive information. The storage and handling of information may involve both electronic and physical actions.

Information Technology Baseline

An information technology baseline is a set of technical requirements that define the minimum required standard practices. Technology Baselines are used in conjunction with Technology Standards and Policies.

Information Technology Guideline

An information technology guideline is a recommended practice that allows some discretion or leeway in its interpretation, implementation, or use.

Information Technology Standard

An information technology standard is a formal document for an established norm of methods, criteria, and processes for technology subjects.

Third Party Business Partner



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Within the context of this document, a third party business partner is a business entity that does business with VCU. Some but not all of VCU's third party business partners will be handling VCU information. Some but not all of VCU's third party business partners will be involved in the collection of data on VCU's behalf or the storing, processing, and/or transmitting VCU information.

University Data and Information

Information in paper, electronic or oral form that is collected, generated, transmitted, processed or stored by a VCU employee, consultant, contractor or other affiliate in the course of their work and is used to support the academic, research, patient care or administrative operations in VCU.

Contacts

VCU Technology Services officially interprets this standard. The VCU Information Security Office (ISO) is responsible for obtaining approval for any revisions as required through the appropriate governance structures. Direct questions regarding this standard to the Information Security Office (infosec@vcu.edu).

Standard Requirements and Procedures

The following section contains the requirements of this standard.

A. Categorization of Data.

All VCU data/information that is generated, processed, stored or transmitted must be categorized as to its level of sensitivity in accordance with the specified classification levels; VCU data classification levels include **Category I** (Confidential and Regulated), **Category II** (Sensitive), and **Category III** (Public) information. Determining the classification of data can be done using the [VCU Data Classification Tool](#).

B. Roles and Responsibilities.

1. The Data Trustee is responsible for:

- appointing the data steward responsible for the classification of data
- communicating effectively with Data Stewards to assure the classification of data and definition of protection requirements

2. The Data Steward is responsible for:

- the identification of types of data handled by each VCU IT system in which their data is generated, processed, stored, and/or transmitted
- the determination of whether their data is subject to Federal or State regulatory requirements



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- the determination of the level of potential harm of a compromise of the confidentiality, integrity or availability of each type of data handled by the IT system, and classify the sensitivity of the data accordingly.
- The review and update of the classification level of VCU (University) data and information for changes in level of sensitivity on an annual basis or as changes occur
- working with data trustees, custodians, and information security office in defining protection requirements for data

3. The Data Custodian is responsible for:

- the selection of the types of data with which they need to work
- reviewing and understanding the classification and protection requirements of the data types they selected
- adhering to the data management guidance / standards; including data protection requirements for the classified type of data

4. The University Information Security Office is responsible for:

- the establishment of a process for VCU Data Stewards and Data Custodians to classify VCU data/information
- the verification and validation of classification for VCU IT systems and data
- working with Data Stewards, Data Trustees, and Data Custodians in defining protection requirements for data
- the communication of approved IT system and data classifications to Data Custodians and Data Stewards

Forms

1. [VCU Information Security Exception Form](#)

Related Documents and Tools

The [Data Classification Tool](#) can be used to help an individual classify data and information in accordance with this standard.

The **VCU Information Technology Policy Framework** (<https://ts.vcu.edu/askit/policies-and-publications/information-technology-policies-standards-baselines--guidelines/>) contains VCU Information Technology Policies, Standards, and Baseline requirements, all of which must be followed in conjunction with this standard.



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Baseline documents can be found in the VCU University Computer Center IT Professionals Intranet under Security Baselines. Access to the IT Professionals Intranet requires approval. Requests for access can be made via email to uccnoc@vcu.edu.

Key policies are

1. [Computer Network and Resources Use Policy](#)
2. [Information Security Policy](#)
3. [Exposure and Breach of Information Policy](#)
4. [Network Management and Security Standard](#)

Revision History

This standard supersedes the following archived policies and standards:

Approval/Revision Date	Title
02/06/2012	Data Classification Standard
09/06/2017	Revisions to Standard

FAQs

Q1. How do I classify my data?

A1. You can classify your data using the [VCU Data Classification Tool](#).