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Information Curatorship Regulation



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Implementaiton Date: 1 January 2023

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Stellenbosch University

Information Curatorship Regulation

Type of document:	Regulation
Purpose:	This regulation, within the context of Stellenbosch University: clarifies the information-governance and management responsibilities of Responsibility Centre heads; defines the role of information curators and deputy information curators; establishes the mandate for an information curators oversight committee; establishes responsibilities for defining information curator required competencies and capabilities, and establishes responsibilities for ensuring the provision of adequate training for information curators.
Approved by:	Rectorate
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Regulation owner¹:	Deputy Vice-Chancellor: Strategy, Global, and Corporate Affairs
Regulation curator²:	Senior Director: Information Governance
Keywords:	Information governance, information management, information curatorship, information stewardship
Validity:	The English version of this regulation is the operative version and the Afrikaans version is the translation.

¹ Regulation Owner: Head(s) of Responsibility Centre(s) in which the regulation functions.

² Regulation Curator: Administrative head of the division responsible for the implementation and maintenance of the regulation.

1. Introduction

Stellenbosch University recognises that information, when effectively and efficiently governed and managed, contributes to the success of the institution. Through its information governance and management initiatives, the University strives to realise the value within the information it holds, processes, and can lawfully obtain. Understanding, establishing, formalising, and supporting key information-related roles and responsibilities is an essential component of realising this value. This regulation defines these dedicated roles and responsibilities and the required supporting structures.

2. Purpose of the regulation

The purpose of this regulation is to promote an enabling institutional environment wherein:

- institutional information-related roles and responsibilities are understood and formally assigned; and
- those with information-related roles and responsibilities are adequately supported to fulfil their duties.

3. Aims of the regulation

Through this regulation, the University aims to support the implementation of a coordinated, multi-disciplinary, and integrated approach towards information management. Specifically, this regulation:

- 3.1 clarifies Responsibility Centre (RC) Heads' information-related responsibilities;
- 3.2 defines the role and responsibilities of information curators and deputy information curators;
- 3.3 establishes the mandate for an information curators oversight committee;
- 3.4 establishes responsibilities for defining information curator required competencies and capabilities; and
- 3.5 establishes responsibilities for ensuring the provision of adequate training for information curators.

4. Scope and application

This regulation applies to:

- all Stellenbosch University students (both full-time and part-time) and staff (both permanent and temporary), members of institutional statutory bodies, and to the extent applicable or required, third-party collaborators, suppliers, contractors, service providers, and vendors;

- all University information, regardless of format, including both physical and digital information.

This regulation has been designed to be as inclusive as possible. In terms of this document, any reference to the word or concept of information applies to the word and concept of data. This enables the application of the regulation principles in the broadest sense, regardless of differences in terminology by subject, discipline, or jurisdiction.

5. Defining information curatorship and the role of the information curator

Professional literature and industry standards define the roles of information owners and information stewards. Within the context of Stellenbosch University, the University:

- assigns information owner roles and responsibilities to RC Heads, clarified in detail under section 6 below; and
- uses the concepts of information curatorship and curators rather than information stewardship and stewards as detailed below.

The concept of information curator has institutional historical precedence and enables ease of translation as required by institutional language-related policies. This eases communication of concepts and responsibilities to relevant stakeholders. When considering the application of professional literature and/or industry standards within individual University environments, in most instances, information curatorship and curators should be considered as synonymous with information stewardship and stewards.

The above considered, the University defines the role of information curator as:

The individual responsible, within a specified institutional function, information domain, time-bound project, or research-related activity, for information management and the expert handling of information processing and administering in compliance with policy and regulatory obligations. The information curator knows how information within their area of responsibility is collected, maintained, and interpreted.

6. RC Head information-related responsibilities

The Rector & Vice-Chancellor is ultimately accountable for the processing of information within the institution under legislation, such as the Protection of Personal Information Act (Act 4 of 2013). The Rector & Vice-Chancellor cannot, however, oversee all information processing within the institution on their own.

RC Heads must therefore support the Rector & Vice-Chancellor. The key RC Head information-related responsibilities are:

- identifying and appointing information curators within their reporting lines;
- providing information-related mandates and serving as the final authority along the escalation chain within their reporting lines;
- holding ultimate responsibility for information-related policy and regulatory compliance within their reporting lines; and
- reviewing, analysing, and responding to reporting regarding information-related risks, opportunities, maintenance, and compliance.

7. Identifying information curators and deputy information curators

The information curator role and responsibilities are assigned:

- by RC Heads to specific positions within their reporting line, based on:
 - institutional function or information domain; or
 - to the project owners of institutional projects or other limited, timebound initiatives;
- to the principal investigators of any research-related activities.

Information curators, appointed based on institutional function or information domain, should be drawn from senior positions to ensure that information governance and management-related initiatives receive sufficient authority to succeed.

In addition to the roles and responsibilities listed within this regulation, research-related activity principal investigators must refer to the institution's research policy framework³ for additional research-related requirements.

Each information curator can designate any number of deputy information curators as is necessary to meet the responsibilities listed within this regulation. A deputy information curator assists an information curator in meeting their responsibilities. An information curator cannot abdicate their responsibilities to a deputy information curator.

³ Available at <https://www.sun.ac.za/english/research-innovation/Research-Development/policies-guidelines>.

8. Information curator responsibilities

Information curators have the decision rights to enforce agreed-upon information-related policies and regulations. All information curators, within their scope of responsibility, must:

- Regularly assess the current state of compliance with institutional information-related policies and regulations;
- Regularly assess the legal and regulatory requirements for information;
- Regularly assess the risk management, business continuity, and resilience requirements for information;
- Promote change, within their scope of responsibility, to support the adoption of institutional information-related policies and regulations;
- Ensure correct classification of information;
- Enforce activities designed to ensure continual progress towards achieving institutional information-related goals;
- Direct and monitor the implementation and operation of mechanisms that ensure the effective and efficient management of access controls to information;
- Direct and monitor the implementation and operation of mechanisms that ensure the correctness and accuracy of information;
- Direct and monitor the implementation and operation of mechanisms that ensure the ongoing availability of information;
- Identify and implement measures to address any poor practices, information quality issues, or compliance gaps
- Report on the above along existing management reporting lines;
- Collaborate with other information curators where responsibilities overlap or lie adjacent to one another or where the integrated nature of information and its use require collaboration;
- Participate and contribute towards institutional information-related policy discussions.

9. Information curators oversight committee

The information curators oversight committee is responsible for:

- identifying and evaluating the University's information-related strategic options;
- presenting information-related recommendations to the Rectorate for decision-making and direction;

- acting upon Rectorate-provided direction, including:
 - developing reporting practices and templates to enable curators to fulfil reporting responsibilities;
 - developing information-related policies, regulations, and procedures;
 - resolving information governance and management issues and questions; and
 - serving as liaison between the Rectorate and information curators.

The committee's membership will include a representative collection of RC Heads, (deputy) information curators, and expert stakeholders.

The Division for Information Governance is responsible for:

- establishing, developing, and maintaining the committee's terms of reference;
- providing or sourcing an independent chair for the committee; and
- providing secretarial support for the committee.

10. Support for information curators and deputy information curators

The Division for Information Governance is primarily responsible for:

- establishing and maintaining a competencies and capabilities framework for (deputy) information curators;
- maintaining a register of (deputy) information curators; and
- identifying, designing, developing or procuring, and implementing relevant training initiatives to address (deputy) information curator training needs based on the competencies and capabilities framework.

11. Non-compliance with this regulation

Failure to apply and explain the principles within the University's information-related policies and regulations may render the University or the individuals, involved with information processing, non-compliant with South African or international information-related legislation. This non-compliance may lead to fines and claims against Stellenbosch University and/or the individuals involved under South African legislation. Non-compliance may further expose the University to significant reputational harm, and data subjects to unnecessary risk and harm.

Based on the nature of the non-compliance, Stellenbosch University may execute its information breach procedures.

Stellenbosch University may take disciplinary action against staff or students for non-compliance with this regulation. Stellenbosch University may act, as allowed by contractual agreement or relevant legislation, against members of institutional statutory bodies and third-party suppliers and vendors for non-compliance with this regulation.

12. Control over this regulation

The Deputy Vice-Chancellor: Strategy, Global, and Corporate Affairs owns this regulation and is thereby responsible for the existence, implementation, monitoring of compliance, and reporting compliance and non-compliance of this regulation to the University's Council and Rectorate.