

## IT AND INFORMATION SECURITY POLICY

### INTRODUCTION

**The purpose of this Policy is to describe the procedures and processes in place to ensure the secure and safe use of the College's network and its resources and to protect College systems and data from unauthorised access or disclosure.**

#### 1. Scope

- 1.1 This policy is intended to be read by all staff for general information and awareness and makes reference to more detailed information and guidance in additional specific policies.
- 1.2 The policy is relevant to all Information and Communications Technology (IT) services irrespective of the equipment or facility in use, and applies to:
  - 1.2.1 All employees and visitors (with a temporary log-in) using the College's equipment and facilities.
  - 1.2.2 All use of IT throughout the College.
- 1.3 In addition, all users of IT and other College facilities are reminded that there are elements of the Staff Code of Conduct which also apply.
- 1.4 The policy also takes into account the creation, management, processing and sharing of information. Therefore, this is an information security policy which incorporates use of IT (hardware and software), electronic communication (email, phone, Teams, WhatsApp etc.) and issues relating to the storage and use of data, including confidential information.
- 1.5 The use of e-mail and the internet are the subject of a separate policy.
- 1.6 Mobile computing and safe transfer of data.

#### 2. Introduction

- 2.1 The College has a large investment in the use of IT which is used to the benefit of all staff and learners.
- 2.2 Throughout the College the use of IT is vital and must be protected from any form of disruption or loss of service. It is therefore essential that the availability, integrity and confidentiality of all IT systems, and data, are maintained at a level which is appropriate for the College's needs.
- 2.3 The policy has three main objectives:
  - 2.3.1 To ensure that all the College's assets, staff, equipment and data are adequately protected against any action that could adversely affect the IT services required to conduct the College's business, and the accuracy and confidentiality of information held.
  - 2.3.2 To ensure that all staff are aware of and fully comply with all relevant legislation.

2.3.3 To create and maintain within all departments a level of awareness of the need for IT and information security, to be an integral part of day-to-day operations and the responsibility of all staff to comply with this and other relevant policies.

2.5 Additional related Policies include:

2.5.1 Email and Internet Policy, describing the acceptable use of the College's email system, its operation and its management.

### 3. Responsibilities

- 3.1 All staff, as users of the College's IT systems, are required to formally acknowledge receipt of this policy.
- 3.2 IT and information security is the responsibility of the College as a whole and consequently a responsibility of all members of staff and other authorised users. The policy has been approved and adopted by the Executive team. All staff and all users will take responsibility for their actions and ensure they do not put the College at risk.
- 3.3 All providers and users of IT services must ensure the security, integrity, confidentiality and availability of all data they create, process or use.
- 3.4 The College complies with all UK legislation which impacts on IT.
- 3.5 By conforming fully to this policy, users can be assured that they will be complying with the relevant legislation. See Paragraph 17 below for information on key legislation.

### 4. Breaches of this Policy

- 4.1 Any breach of this policy is viewed very seriously by the College and could lead to disciplinary action and/or prosecution as appropriate.
- 4.2 Violations of this policy will include, but are not limited to, any act, behaviour or actions that:
  - 4.2.1 Involves the malicious use of data.
  - 4.2.2 Involves the disclosure of confidential information.
  - 4.2.3 Involves the sending of defamatory information.
  - 4.2.4 Involves the installation of unauthorised software.
- 4.3 Any individual who has knowledge of a violation of this *IT & Information Security Policy* must report that violation immediately to the *Director: IT, Estates & Learning Resources*.

### 5. Network Access

- 5.1 Access to the network, and any equipment, application, database or other resource must be by individual login – i.e. unique username and password. Other than in certain circumstances, generic login credentials are not permissible except in exceptional circumstances where local need requires this e.g. in the Learning Resource Centres and Flexible Learning Centres.

- 5.2. All external use of the network must be by named individuals only, utilising the College remote access system.
- 5.3. The creation of new staff accounts is carried out by the MIS team on receipt of data from the HR team. This is an automatic process.
- 5.4. Each individual who is authorised to access the College network is given a profile which limits his or her access to approved data, files and software. Levels of access are audited every six months to ensure staff maintain appropriate access.
- 5.5. If, for the purpose of a special project, an individual requires access beyond their normal profile permissions, special access can be arranged, but only for the duration of the project. Any request for a temporary or permanent variation from the profile must be made to the IT helpdesk and authorised by an appropriate line manager.
- 5.6. All users must only access, or attempt to access, what is permitted by their profile. If there is any difficulty in accessing files or programmes, the IT helpdesk must be informed as soon as possible.
- 5.7. If access to a file held in an individual's college provided personal storage is necessary in the absence of an individual, then the line manager will attempt to contact the individual concerned to allow access and then contact the IT helpdesk for assistance. The reason for the access, the type of information, and the identity of the person holding it will be needed. In exceptional circumstances, access may be granted without the authorisation of the individual, e.g. they are off work sick and unobtainable.
- 5.8. As a principle, all users must retain their files on their college provided cloud storage and departmental shared drive. Should additional storage space be required this can be arranged via the IT helpdesk. Please note that this space should not be used to store personal files e.g. music or photographs.
- 5.9. Data stored on a local computer's hard drive is not automatically backed up and may be accessible to anyone switching on the PC. A computer hard drive is therefore not secure, and data should not be stored locally.
- 5.10. Where a computer is shared by a number of users, it is essential for all users to log off the computer before leaving it. A user is responsible for all work carried out on a computer using their login details, including internet access and email use, whether or not that user was actually using the computer themselves. Users will not be held responsible where illegal access was found to be as a result of malicious software.
- 5.11. The network will require a password change for all staff once a year but staff with domain admin accounts will require a change every 90 days (in accordance with GCHQ guidance).
- 5.12. Access may be suspended as part of any disciplinary action involving breach of college policies.
- 5.13. Segregation of Duties
- 5.13.1 Access to systems and applications is restricted according to the role and business requirements of each user. Access rights are agreed by a user's line manager and the owner of the system or application.
- 5.13.2 Access to systems and applications is at all times by unique user ID. Group IDs are generally not allowed, except by specific agreement of the Head of IT, Estates & Learning Resources, and where relevant, internal audit.

- 5.13.3 Within a system or application, segregation of duties must be implemented to prevent accidental or deliberate misuse. Duties or responsibilities which may give rise to a conflict of interest if carried out by the same individual must be separated.
- 5.13.4 Access rights are established through the New User/Change User process.
- 5.13.5 Established access rights must be reviewed twice yearly as a minimum to ensure that access to systems and applications remains appropriate and consistent.
- 5.13.6 On receipt of a "Delete User" instruction, access rights to all systems and applications associated with that user will be revoked immediately. Weekly leaver reports from HR should also be checked against access permissions as a second check.
- 5.13.7 System Administrator access allows full unrestricted rights to defined systems and applications for management purposes, including the creation and removal of system users. This level of access must be kept to the minimum number of individuals required to enable day-to-day operation and emergency access in the event of a system failure. System Administrator access should be via unique individual ID.
- 5.13.8 The use of privileges in systems and applications must be allocated in a restricted and controlled manner. Privileges enable users to override some controls within a system, usually for system management purposes, and privileges must be removed when no longer required.
- 5.13.9 Access to systems and applications by third parties, such as partner organisations or software maintenance/support personnel, must be restricted to organisations where a written contract has been established for the delivery of those services and where appropriate a confidentiality agreement. Access by third parties must be restricted to only those systems, or parts of those systems, that are required and must be revoked as soon as it is no longer required. Access must be subject to approval and a confidentiality agreement.

## **6. Passwords**

- 6.1 Passwords must be used in order to access computers, applications, systems and all other networked resources.
- 6.2 Your password must be a minimum of 14 characters. You should never write down or let others know your password. Your password must not contain easy to guess words like 'password'. When choosing a new password ensure it is substantially different from your old password. Three or four random words is acknowledged as the best way to create a password.
- 6.3 Never enter your login details into a website or system unless you are certain it is legitimate, please contact the helpdesk if you are unsure. If you suspect your password might have been stolen, please change your password and contact the helpdesk immediately – Phishing and credential theft are one of the main methods of credit card or bank account fraud, Ransomware etc.
- 6.4 The same password must not be used for more than one application, system, device or service.
- 6.5 Staff with higher level access to College IT systems (administrators) should maintain a personal account for everyday use and an administrator account that is only used when required for admin use. Different password must be applied to both accounts.

6.6 The network will prompt for a password change once a year.

6.7 In summary:

#### **Strong Password Dos and Don'ts**

<b>DO</b>	<b>DON'T</b>
Use a password consisting of four easy to remember words, each at least 4 characters long.	Use your network login ID in any form.
Make sure your password is long but easy to remember. Long passwords are very hard for hackers to crack.	Use your first, middle or last name or anyone else's in any form. Don't use your initials, nickname, or anyone else's.
	Use information easily obtainable about you – phone numbers, car registration plate, pet names etc.
	Use a password of all numbers, dates or a combination.
	Use a password that is largely the same as any previous passwords e.g. changing numbers on the end.

6.8 If a software package comes installed with a default password, that password must be changed immediately after installation.

6.9 Passwords must not be posted in a location accessible by others (such as a note stuck to the monitor, under the keyboard or even in a desk drawer).

6.10 Passwords must NEVER be divulged to or shared with anyone else. There are NO exceptions to this, and if a password is disclosed, and therefore compromised the IT helpdesk must be contacted. If a user is asked for their password over the telephone by someone purporting to be from information services or any outside authority, company or organisation, it must not be given. The name and telephone number of the person requesting the password must be taken and the IT helpdesk must be informed immediately.

6.11 A machine must not be left unattended while logged onto a system and should be locked.

6.12 Where files or data need to be shared between individuals the data must be held in a networked, restricted shared team folder or other secure environment.

6.13 A log file of invalid login attempts will be maintained.

#### **7. Physical Security**

7.1 All hardware devices must bear an asset tag sticker, which must not be removed throughout the life of the device.

7.2 All desktop devices, e.g. PC, printer and scanner, must have adequate precautions taken to protect them against theft and accidental damage, in addition to environmental threats and hazards. All manufacturer and supplier instructions and advice must be followed.

7.3 Security precautions should, in the first instance, concentrate on adequate building security and siting of the device in the office, and then may extend to simple lock down devices attached to a desk.

- 7.4 All IT hardware and software purchasing must be coordinated through the IT team. This ensures that equipment in use across the College is consistent, meets appropriate standards and is compatible with existing equipment and network resources. Therefore, all purchases of hardware and software must be made through the Head of IT, Estates & Learning Resources. Advice on hardware and software requirements is also available from the IT team via the IT helpdesk.
- 7.5 All desktop computer equipment should be **turned off** (not at the wall socket) when not being used for an extended period of time.

## **8. Installation of Software**

- 8.1 Software purchases must be coordinated through the IT helpdesk.
- 8.2 Only software for which the College is licensed may be installed upon any College computer. Only staff with the appropriate rights will be allowed to install software on College PCs. A full inventory of all software and licensing will be maintained in the College's software asset management system.
- 8.3 If there is any doubt about software license or authenticity the IT helpdesk must be contacted before proceeding with installation.
- 8.4 Appropriate action will be taken against any user found to have installed software that is not properly licensed or if the software is being used contrary to its license agreement.
- 8.5 Modification to existing software is generally discouraged, and in any case must be progressed through the IT helpdesk
- 8.6 In certain circumstances College IT staff will evaluate new software on their PC to determine if it would be of benefit to the College. All managers must follow any conditions laid down by the software provider especially when the evaluation is completed. The IT helpdesk must be contacted if there are any problems in following the set conditions.
- 8.7 Staff negotiating contracts, under which software is to be written for the College, must seek to ensure that suitable arrangements are made for copyright to be vested in the College wherever possible.

## **9. Security**

### **9.1 Security Incidents**

- 9.1.1 A security incident is a situation where the security of a PC, a system, an application or the network has been compromised, and may be from an internal or external source.
- 9.1.2 Examples would include users who have accessed data or material which their user profile should have prevented them from seeing or perhaps accessed a system or application at a user level to which they are not entitled. It could also be the introduction of a virus to a PC and/or the network, or network access by an unauthorised user.
- 9.1.3 Any individual who becomes aware of a security incident must report it as soon as possible, to his or her manager and to the IT helpdesk.

### **9.2 Security Weaknesses**

- 9.2.1 A weakness is a situation whereby potential for a security incident is identified. A PC may be left unattended, logged into a system without a password-protected screensaver or other locking procedure potentially allowing access by unauthorised users.
- 9.2.2 Further examples could be the inclusion of too many individuals in a system's administrator profile or a lack of procedures for signing out laptops or other portable devices to individuals, potentially allowing unidentified and/or unauthorised use of the equipment.
- 9.2.3 A weakness does not have to be specifically IT related. It could be windows left open close to portable equipment, or a PC monitor displaying potentially sensitive data positioned to face a window.
- 9.2.4 Any individual who becomes aware of a security weakness must report it as soon as possible, to his or her supervisor, and to the IT helpdesk.

### 9.3 Security Breaches and Violations

- 9.3.1 A security *breach* is an activity which causes or has the potential to cause the loss, damage or corruption of data. This may be the result of a specific security Incident, a security weakness, a violation of security policies or procedures or a combination of all three.
- 9.3.2 A security *violation* is any activity which contravenes the IT & Information Security Policy and other related policies, procedures and guidelines and may result in a security breach.
- 9.3.3 Any individual who has knowledge of a violation of this or other associated policies must report that violation as soon as possible to the IT helpdesk.

- 9.4 Any security breach or violation of this and other related policies could lead to appropriate action being taken against those who commit such a breach or violation. Violations and breaches will be addressed under appropriate procedures which may include the Disciplinary Procedure.

### 9.5 Multi Factor Authentication

- 9.5.1 Multi-factor authentication (MFA) is a security process in which a user is prompted to provide more than one form of identification in order to verify their identity. This can include something the user knows (e.g., a password), something the user has (e.g., a smartphone or smartkey),

MFA is important because it provides an additional layer of security beyond just a password. If a password is compromised, an attacker will still need to have access to the other forms of identification in order to gain access to the user's account. This makes it much harder for an attacker to successfully impersonate the user

- 9.5.2 The college has implemented multi factor authentication on all staff accounts including access remotely via VPN. All staff are required to use either their own or a supplied device to enter a secondary form of identification. All student accounts will be added to this system in 2024.

## 10 **Malware Prevention and Control**

- 10.1 Computer malware is a generic term for computer programs that copy and infect a computer without the permission or knowledge of the user. Malware can also transmit itself across a network, spreading the infection to other computers and devices.

- 10.2 The general term “malware”, covers various types of virus, worms, trojans, and spyware. Malware can cause performance problems or more long-term damage to a computer or network.
- 10.3 Malware is most commonly introduced to a computer through internet downloads and as attachments to emails.
- 10.4 If a virus is found or suspected to be on a machine or external storage media, the IT helpdesk must be informed immediately.
- 10.5 From time to time the IT helpdesk may notify users, through email, concerning malware and its effect. All users must take appropriate action when so notified. Deliberate contravention of such a notification is a potential disciplinary matter.
- 10.6 Malware Prevention
- 10.6.1 No computing devices, whether desktop or portable, must be implemented on the network without appropriate anti-virus software being installed.
- 10.6.2 All software must be checked for viruses before installation on any College device, including computers, laptops and other portable devices.
- 10.6.3 If there is any doubt as to the origin of the files being transferred, they must always be checked for viruses before use.
- 10.6.4 Networked desktop PCs are updated automatically but other equipment such as laptop computers and other mobile devices need to be updated individually. The IT helpdesk can provide further information.
- 10.7 Downloading from the Internet
- 10.7.1 The downloading and installation of software from the internet is only allowed to designated staff with the appropriate rights.
- 10.7.2 More information on the use of the internet is available in the Email and Internet Policy.
- 10.8 Extracting Email attachments
- 10.8.1 Anti-virus software is installed on the College network and networked machines. This will scan all attachments for malware.
- 10.8.2 If there are any doubts about the authenticity or content of an email or its attachment the IT helpdesk should be contacted immediately for advice prior to opening the file.
- 10.8.3 More information on the use of the email system is available in the Email and Internet Policy.
- 11. Mobile Computing**
- 11.1 Responsibility
- 11.1.1 Anyone allocated a mobile device must assume an appropriate level of responsibility for the device itself and the information stored on it, in accordance with the requirements of this policy.



- 11.1.2 Upon receiving a mobile device the user must complete a Mobile Computing Device User's Agreement.
- 11.1.3 Upon leaving the employ of West Nottinghamshire College or a change in roles or responsibilities which results in the user no longer requiring the mobile device, it must be returned to the IT Department. The IT Department remains responsible for the re-distribution of mobile devices. Upon returning the device the Mobile Computing Device User's Agreement must be signed off to release the individual from their responsibility for the device.
- 11.1.4 Users must take all reasonable steps to ensure no unauthorised persons have access to the mobile device or the data stored on it.
- 11.1.5 Users must take all reasonable steps to ensure that no unlicensed or malicious software is installed on the mobile device.
- 11.1.6 **Loss of Mobile Devices and Accessories**  
All users should take good care of their mobile devices and accessories to avoid any damage, loss or theft. The emphasis is on personal responsibility. In the event a user requires a replacement of lost, stolen or damaged equipment they may be liable for the cost of replacement if it is considered they have been negligent in their actions.  
  
It is the responsibility of the user to contact the IT Helpdesk at the College in the event of a lost or stolen mobile phone or data device.
- 11.1.7 **Return of Mobile Devices, Data Devices, Sim Cards and Accessories on leaving the College**  
It is important that all College equipment is returned to the IT Department at the end of your contract. Individuals will be responsible for any items not handed back directly to the IT department. When items are returned a return receipt will be issued. Failure to return items will result in charges being passed on to the employee.

## 11.2 Physical Security of College issued Mobile Devices

- 11.2.1 All mobile devices must be maintained in an environment with an appropriate level of security to prevent unauthorised access to information stored on the device.
- 11.2.2 When not in use in college, all mobile computers must be retained in a secure environment. e.g. Do not leave items in a vehicle overnight.
- 11.2.3 When mobile devices are taken from the main office or storage area all users must ensure that they take adequate precautions to protect the equipment against theft or accidental damage at all times.
- 11.2.4 Mobile devices must have appropriate access protection, for example, passwords and encryption on laptops and access codes on a phone.

## 11.3 Data Security when using Mobile Devices

- 11.3.1 All College laptops must be encrypted. You should never share your password with any other user.

- 11.3.2 In the case of personal data the level of security forms part of the College's notification to the Information Commissioner under the Data Protection Act. This could be compromised if files are taken outside the workplace without appropriate measures being taken.
- 11.3.3 Equipment carrying important, sensitive and/or critical business information must not be left unattended.
- 11.3.4 Users who travel with a college mobile device must make regular backups of any data it contains to the College network. Advice on making backups can be obtained from IT Support.
- 11.3.5 The mobile device must not be used to store passwords, safe/door combinations, or classified/sensitive information.

#### 11.4 Bring Your Own Device (BYOD)

- 11.4.1 The College recognises that staff, students and visitors may wish to use electronic devices they own while on college premises. The College is supportive of users utilising their own equipment but must ensure that people comply with Data Protection and Health & Safety legislation.
- 11.4.2 Mobile devices are used at the owner's risk. The College will take no responsibility for accidents occurring as a result of the use of a personal device.
- 11.4.3 Users may charge mobile devices in college power outlets in order to maintain their use during their time onsite. However, users are responsible for performing a visual inspection of their device including cables and leads to ensure that there are no visible signs of damage. User checks should be carried out before most electrical equipment is used, with the equipment disconnected.

Individuals should look for: -

- damage to the lead including fraying, cuts or heavy scuffing, e.g. from floor box covers.
- damage to the plug, e.g. to the cover or bent pins.
- tape applied to the lead to join leads together.
- coloured wires visible where the lead joins the plug (the cable is not being gripped where it enters the plug).
- damage to the outer cover of the equipment itself, including loose parts or screws.
- signs of overheating, such as burn marks or staining on the plug, lead or piece of equipment.
- equipment that has been used or stored in unsuitable conditions, such as wet or dusty environments or where water spills are possible.

Where there are any of these signs or anything else of concern then the device MUST NOT be connected to college power outlets.

- 11.4.4 Users must ensure their device and cables do not represent a trip hazard.
- 11.4.5 Users will be allowed to connect to the internet but will be subject to the normal College web filtering rules. Users are responsible for ensuring that their device is not used to access any illegal material or anything that would contravene the College Internet and Email Policy.
- 11.4.6 Users will be able to access the internet to assist them with their work or studies. Access to the College network including home directories will not be available on personal devices. Users will only be allowed to connect to the network using Wi-Fi.

- 11.4.7 Users must enter their student/staff login credentials in order to access the internet on their device. This will allow tracking of all sites visited and enforcement of standard College web filtering.

## 11.5 EDUROAM

- 11.5.1 West Nottinghamshire College has joined the Eduroam network and as such staff will be able to use the Wi-Fi in any Eduroam hotspot around the world. These are frequently found in education establishments such as universities however the full list of available sites can be discovered using the 'eduroam companion' app available for both Apple and Android devices.
- 11.5.2 In order to access Eduroam, staff need to connect their devices to the Wi-Fi point labelled "Eduroam" and enter their West Nottinghamshire College user id and password (just as if you were logging onto the network in a college building).
- 11.5.3 Under Eduroam rules: Users
- Are accountable to the organisations that issue them with their credentials (and to the law) for all use of such credentials and any activities undertaken with the authority of those credentials. In particular, users must not allow their own credentials, or network access authenticated by them, to be used by others. If the user believes that their credentials may have been compromised the user concerned must immediately report this to the IT team at West Nottinghamshire College
  - Must abide by restrictions applied by the home organisation and by Janet, including Acceptable Use Policies, Computing Regulations and Disciplinary Codes. Restrictions imposed by the visited organisations must also be respected. Where Regulations differ, the more restrictive applies.

## 12. **Sending Confidential Information**

- 12.1 It is the responsibility of all employees of the College to safeguard the security of confidential and/or personal data for which they are responsible, or which they access in order to carry out their job. There is also a responsibility to bring to a manager's attention any areas of concern regarding the transfer or transportation of such information.
- 12.2 As a general rule personal and sensitive corporate data must not be disclosed, transferred, or copied to third parties without authorisation from an appropriate senior manager, who understands the purpose of the request and is aware of the procedures to follow.
- 12.3 Before making information available to anyone else, employees must make sure that they have the authority to disclose it.
- 12.4 Six basic principles regarding movement of data
- 12.4.1 Ideally staff should not copy any personal data off the main College system.
- 12.4.2 Sensitive personal data should only reside on secure College systems and copies should NEVER be made unless authorised by a manager.

- 12.4.3 If working with personal data on a non-College site use the remote access system as this enables you to store work online and the data will never leave the College premises.
- 12.4.4 If your role requires you to work with personal data offsite then ensure that you are using an encrypted laptop and never share your password with anyone else.
- 12.4.5 Any personal data copies off main College systems MUST be held on an encrypted laptop or an encrypted datastick. These are available from the Head of IT, Estates & Learning Resources.
- 12.4.6 If you need to send personal data outside the organisation contact the Director: IT, Estates & Learning Resources.

## 12.5 Providing information by telephone

- 12.5.1 Information must never be given out over the phone or by any other verbal means unless it is absolutely clear who it is being given to and that they are entitled to the information and are ready and able to accept it.
- 12.5.2 Care must be taken to ensure that conversations involving confidential and/or personal information cannot be overheard.
- 12.5.3 Voicemail messages containing personal information should only be left after due consideration has been given to the security and confidentiality risks involved.
- 12.5.4 Recorded phone messages containing confidential information must be secured by password access.

## 12.6 Providing Information by Email

- 12.6.1 Email is not a secure means of communication outside the security of the College's network and must not be used for sending personal or sensitive corporate data.
- 12.6.2 Even when emailing within the security of the College network it is important to ensure the name and email address of the recipient is correct and that a suitable subject line is used which does not include personal information.
- 12.6.3 The sender must also ensure that the recipient is expecting the information and confirm that it has been received successfully.

## 12.7 Providing Information by Surface Mail

Information transported by surface mail must be protected from unauthorised access and environmental damage. External organisations should be requested to use secure post when forwarding confidential information, using tamper-evident packaging when possible.

- 12.8 When using internal mail, confidential information must be placed in clearly identifiable envelopes and must be protected from loss and accidental viewing, using lockable storage equipment where appropriate.

- 12.9 Electronic data physically transported between sites, departments or organisations must be properly packaged and clearly labelled to ensure it is handled correctly and not corrupted by magnetic fields or other environmental damage.

### **13. Termination of Employment**

- 13.1 When a user who has network access leaves the employment of the College the appropriate manager must arrange for the transfer of any necessary files and e-mail folders.
- 13.2 The HR team will inform the IT team that the user is leaving so that the user's login credentials can be removed from the network. This removal will not take place earlier than 28 days after the user has left to allow for the deletion or transfer of files, data and emails within the department. However, the user's access rights will be disabled immediately.
- 13.3 On termination it is the user's responsibility to return all equipment, entry passes, software, documentation (both paper and electronic) and any other College asset in their possession.
- 13.4 A user's login rights will be suspended at the end of their last day of employment.
- 13.5 Should staff announce they are leaving the organisation, or if roles are placed at risk of redundancy, then managers/Director: IT, Estates & Learning Resources may conduct a risk assessment to determine if it is appropriate for access rights to be maintained.

### **4. Disposal of Media and Equipment**

- 14.1 All PCs and data storage devices which have become obsolete or are surplus to requirement must be wiped clean. CDs and DVDs must be shredded before disposal.
- 14.2 The disposal of equipment is subject to the College's Financial Regulations and prior approval from the Director of Finance.
- 14.3 All removable media must be rendered unusable before disposal. (It should be noted that reformatting does not delete all data from disks and such data can subsequently be recovered using freeware.)
- 14.4 All magnetic tapes must be disposed of by a company or agency which meets Waste Electrical and Electronic Equipment (WEEE) Regulation standards.
- 14.5 All paper records can be disposed of through In-Print. However, paper documents containing confidential and/or personal information must be sent for shredding.

### **15. Audit and Review**

- 15.1 IT and information security is managed through the Head of IT, Estates & Learning Resources and is subject to regular audit and review.
- 15.2 The review process incorporates compliance testing of individual practices and procedures.

### **16 Handling of Payment Card Data**

- 16.1 Some college staff may be responsible for handling payment cards and processing the information they contain. The college has a Cardholder Data Policy and staff who handle payment card information are required to read and sign to confirm that they have read this additional policy.

## **17. Key Legislation**

### **17.1 Data Protection Act 2018**

17.1.1 Further information about Data Protection is available in the College's Data Protection Policy,

17.1.2 Data Protection refers to the principles and provisions of the Data Protection Act 2018, which seeks to govern the secure management of personal data, and in particular:

- The obtaining of personal data.
- The storage and security of personal data.
- The use of personal data.
- The disposal and/or destruction of personal data.

17.2 In Data Protection terms, personal data is information which would enable the identification of any living individual.

### **17.3 The Computer Misuse Act 1990**

16.3.1 This Act defines specific offences relating to computer "hacking". Even the intent to make knowingly unauthorised access to programmes or data in a computer is an offence if the computer is made to perform some action (which can be as minor as scrolling the display).

17.3.2 Employees who themselves have authorised access do not have the authority to confer or authorise access on others.

17.3.3 It is an offence to incite anyone to confer unauthorised access.

17.3.4 It is an offence to cause unauthorised modification to programmes and data, which includes deliberately introducing a virus.

### **17.4 The Copyright, Design and Patents Act 1988**

17.4.1 This Act specifies offences relating to the illegal copying of computer software.

17.4.2 All organisations have a legal responsibility to ensure all computer software is licensed by the vendor who holds the copyright to the product. Organisations are responsible for maintaining adequate records to prove compliance.

17.4.3 It has to be the policy of any organisation to ensure no copyright material is copied without the owner's consent.

This Act is enforced by organisations such as FAST (Federation Against Software Theft) and BSA (British Software Alliance) who have wide ranging powers to ensure compliance.

### **17.5 The Prevent Duty 2015**

### **17.6 General Data Protection Regulation 2016**