



Communications, Email and Internet Policy

1. INTRODUCTION

- 1.1 This Communications, Email, and Internet Policy applies to all employees, students, contractors, and agents of Norland College, a company registered in United Kingdom under number 193170, whose registered office is at York Place, London Road, Bath, BA1 6AE (“the College”) who use the communications equipment, computers, devices, and systems provided by the College (“users”).
- 1.2 For the purposes of this policy, the IT Support Team includes IT staff appointed by the College and the employees assigned to Norland by the external IT company.
- 1.3 Users are encouraged to use email and the internet at work as a fast and reliable method of communication with significant advantages for business.
- 1.4 In light of the fact that communications made by users and their other activities online reflect upon the College and are capable of creating a number of commercial, professional, and legal problems, this policy is intended to clarify what the College expects from users and their responsibilities when using the College’s communications, email, and internet facilities (collectively, “the College’s internet/network and communication facilities”).
- 1.5 The College’s internet/network and communication facilities include:
 - 1.5.1 Telephone;
 - 1.5.2 Email;
 - 1.5.3 Internet;
 - 1.5.4 Intranet;
 - 1.5.5 Wired network infrastructure;
 - 1.5.6 Wireless network infrastructure
- 1.6 Whilst the College’s internet/networking and communications facilities are made available to users for the purposes of the business, a certain amount of limited personal use is permitted insofar as such personal use is consistent with this policy and the duties of the user.
- 1.7 In addition to this policy, when using the College’s internet/networking and communications facilities, users must also comply with other college policies including the College’s Data Protection Policy, Equal Opportunities and Diversity Policy, Harassment and Bullying Policy, Bring Your Own Device Policy and Acceptable Use Policy.

2. GENERAL PRINCIPLES

There are certain general principles that should be borne in mind when using any type of communication, be it external or internal, including hard copy letters, memos, and notices. The College expects all users to:

- 2.1 Use the College’s internet/networking and communication facilities, and non-electronic facilities including but not limited to college letterheads and stationery, responsibly and professionally and at all times in accordance with their duties;



- 2.2 Be mindful of what constitutes confidential or restricted information and ensure that such information is never disseminated in the course of communications without express authority;
- 2.3 Be mindful of what constitutes personal data and ensure that personal data is never disseminated in the course of communications unless it is used in accordance with the College's Data Protection Policy and with express authority;
- 2.4 Ensure that they do not breach any copyright or other intellectual property right when engaging in communications. Be sure that materials used are correctly referenced and credited to the original author/owner and clearly states the right under which its use is permitted;
- 2.5 Ensure that they do not bind themselves or the College to any agreement without express authority to do so; and
- 2.6 Be mindful of the fact that any communication may be required to be relied upon in court, to the advantage or the detriment of the individual or the College, and to conduct their use of communication systems and equipment accordingly.
- 2.7 In accordance with the Acceptable Use Policy, the viewing, transmission, downloading, uploading, or accessing in any way of any of the following material using the College's internet/networking and communications facilities will amount to gross misconduct with the possibility of summary dismissal:
 - 2.7.1 Material which is pornographic, sexist, racist, homophobic, or any other discriminatory or otherwise offensive material;
 - 2.7.2 Illegal or criminal material, including material which breaches copyright or any other intellectual property right;
 - 2.7.3 Any material which has the object or effect of causing harassment to the recipient;
 - 2.7.4 Material which the user knows, or reasonably ought to know, is confidential or restricted information and which they are not authorised to deal with;
 - 2.7.5 Subject to paragraph 3.7, any website or online service which the College has blocked access to.

3. INTERNET USE

- 3.1 The College provides access to the internet for the sole purpose of business and to assist users in the performance of their duties. However, the College recognises that users may need to use the internet for personal purposes as outlined in the Acceptable Use Policy and such use is permitted provided it is reasonable and does not interfere with the user's performance of their duties. Users may be asked to justify the amount of time they have spent on the internet or the sites they have visited.
- 3.2 Users must not use the internet to gain or attempt to gain unauthorised access to computer material or private databases, including restricted areas of the College's network. Nor must they intentionally or recklessly introduce any form of malware, spyware, virus, or other malicious software or code to the communications equipment or systems of the College.
- 3.3 Users must not access or attempt to access any information which they know or reasonably ought to know is confidential or restricted.



- 3.4** Users must not access or use personal data online in any manner that is inconsistent with the College's Data Protection Policy.
- 3.5** Users must not download or install any software without the express permission of the IT Support Team.
- 3.6** In accordance with paragraph 2.7, users must not attempt to download, view, or otherwise retrieve illegal, pornographic, sexist, racist, offensive, or any other material which is in any way in bad taste or immoral. Users should note that even material that is legal under UK law may nonetheless be in sufficiently bad taste to fall within this definition. As a general rule, if any person might be offended by any content, or if that material may be a source of embarrassment to the College or otherwise tarnish the College's image, viewing that material will constitute a breach of this policy. Any such attempt will constitute a disciplinary offence and in addition to internet access being reviewed, reduced, or withdrawn, may be subject to disciplinary action or summary dismissal.
- 3.7** Certain websites are blocked and cannot be accessed using the College's internet/networking and communication facilities. If a user has a genuine and specific business need to access a blocked site, they must contact the IT Support Team.

4. SOCIAL MEDIA USE

- 4.1** Users may use social media for personal purposes occasionally during work hours provided that such usage complies with the provisions of the College's Social Media Guidance document and provided that it does not interfere with their work responsibilities or productivity.
- 4.2** Certain users may from time to time be required to use social media on behalf of the College. Users should only do so with the authorisation of their Head of Department, in accordance with instructions issued by the Head of Department, and in accordance with the College's Social Media Guidance.
- 4.3** The College recognises that in their private lives users may wish to publish content on the internet through a variety of means, including social media. Even outside of work users must refrain from doing anything on social media or any other websites that defames, disparages, or otherwise brings into disrepute, the College, staff or student(s), or other related third parties. This includes, but is not limited to, making false or misleading statements and impersonating colleagues or third parties.
- 4.4** If a user makes any posting, contribution, or creation or publishes any other content which identifies or could identify the user as an employee, student, contractor, agent, or other member or associate of the College, or in which the user discusses their work or experiences relating to the College, the user must at all times ensure that their conduct is appropriate and consistent with their contract of employment/Code of Professional Responsibilities and the corporate image of the College, and should bear in mind that the user owes a duty of fidelity to the College.
- 4.5** If a user is unsure as to the appropriateness of a posting or other content they wish to publish, they should speak to their manager/tutor at the earliest opportunity to seek clarification.
- 4.6** If, in any contribution or posting which identifies or could identify the user as an employee, student, agent, or other affiliate of the College, the user expresses an idea or opinion, they should include a disclaimer which clearly states that the opinion or idea expressed is that of



the user and does not represent that of the College.

5. COLLEGE EMAIL USE

- 5.1** The email address with which users are provided by the College (ending in the suffix @norland.ac.uk or @norland.co.uk) is provided for business purposes in order to facilitate information sharing and timely communication with colleagues, students, suppliers and associates. Any college business which is conducted via email must be conducted using college email and is under no circumstances to be conducted through any other personal email address or account.
- 5.2** Users should adopt the following points as part of best practice:
- 5.2.1** Before communicating via email, users should satisfy themselves that it is the most suitable mode of communication, particularly where time is of the essence;
 - 5.2.2** Ensure that the email contains the College disclaimer notice. This should be added automatically by the email client. If it is not, users should speak to the IT Support Team immediately;
 - 5.2.3** Emails should be worded appropriately and in the same professional manner as if they were a letter;
 - 5.2.4** Users should be careful not to copy an email automatically to everyone copied into the original message to which they are responding as this may result in inappropriate or unlawful disclosure of confidential information and/or personal data;
 - 5.2.5** Users should take care with the content of emails, in particular avoiding incorrect or improper statements and the unauthorised inclusion of confidential information or personal data. Failure to follow this point may lead to claims for discrimination, harassment, defamation, breach of contract, breach of confidentiality, or personal data breaches;
 - 5.2.6** All emails should be proofread before transmission, which includes ensuring that any attachments referred to in the text are actually attached and are correct and the intended recipients' email addresses are correct;
 - 5.2.7** If an important document is transmitted via email, the sender should telephone the recipient to confirm that the document has been received in full;
- 5.3** Users must not email any business document classified as not safe for the public domain or documents that hold personal information on someone other than yourself or intellectual property to their own, a family member's, a friend's or a colleague's personal web-based email accounts.
- 5.4** If users use college email for personal reasons, they will be deemed to agree to the possibility that any emails sent or received may be subject to monitoring in accordance with section 10 of this policy.
- 5.5** Users must not send abusive, obscene, discriminatory, racist, harassing, derogatory, pornographic, or otherwise inappropriate material in emails. If any user feels that they have been or are being harassed or bullied, or if they are offended by material received in an email



from another user, they should inform their manager/tutor or the Head of HR, Resources and Compliance.

- 5.6** Users should at all times remember that email messages may have to be disclosed as evidence for any court proceedings or investigations by internal or regulatory bodies and may therefore be prejudicial to both their and the College's interests. Users should remember that data which appears to have been deleted is often recoverable. If secure deletion is required, for example, where an email contains confidential information or personal data, users should follow the steps set out in the College's Data Protection Policy.

6. PERSONAL EMAIL USE

Users are permitted to access and use their personal email accounts only to the extent that such use is reasonable and does not interfere with the user's performance of their duties.

7. COLLEGE TELEPHONE SYSTEM USE

- 7.1** The College's telephone lines, and mobile phones issued by the College are for the exclusive use of users at the college. Essential personal telephone calls regarding users' domestic arrangements are acceptable, but excessive use of the College's telephone system and/or mobile phones for personal calls is prohibited. Acceptable use may be defined as no more than 30 minutes of personal calls in a working week. Any personal telephone calls should be timed to cause minimal disruption to users' work.
- 7.2** Users should be aware that lists of telephone calls made and received on the College's telephone lines may be monitored to ensure the telephone system is not being abused.
- 7.3** If the College discovers that the telephone system or a mobile phone issued by the College has been used excessively for personal calls, this will be treated as a disciplinary matter and will be handled in accordance with the College's disciplinary procedures. Users may be charged for the combined duration of the calls. The user will be invited to an informal discussion to explain the circumstances around the excessive use by their manager/tutor. If after an informal discussion there was no legitimate reason for the excessive use, the user may be subject to the relevant college Disciplinary Policy and Procedure.

8. PERSONAL MOBILE PHONE USE

- 8.1** Essential personal telephone calls regarding users' domestic arrangements are acceptable, but excessive use outside of personal breaks of users' own mobile phones for personal communications (including, but not limited to, calls, messaging, emailing, and web browsing) is prohibited.
- 8.2** Any personal telephone calls on users' own mobile phones should be timed to cause minimal disruption to users' work and to colleagues working nearby.
- 8.3** The user will be invited to an informal discussion to explain the circumstances around the excessive use by their line manager/tutor. If after an informal discussion there was no legitimate reason for the excessive use, the user may be subject to the relevant college Disciplinary Policy and Procedure.



9. SECURITY

- 9.1** The integrity of the College's business relies on the security of the College's internet/networking and communications facilities. Users bear the responsibility of preserving the security of the College's internet/networking and communications facilities through careful and cautious use. In addition to the general provisions contained in this policy, users must also comply with the College's Data Protection Policy and Acceptable Use Policy.
- 9.2** Access to certain websites and online services via the College's internet/networking and communications facilities is blocked. Often the decision to block a website or service is based on potential security risks that the site or service poses. Users must not attempt to circumvent any blocks placed on any website or service by the College.
- 9.3** Users must not download or install any software or program without the express permission of the IT Support Team and are reminded of paragraphs 3.2 and 3.5 of this policy.
- 9.4** Users must not delete, destroy, or otherwise modify any part of the College's internet/networking and communications facilities (including, but not limited to, hardware and software) without the express permission of the IT Support Team.
- 9.5** Users must not share any password that they use for accessing the College's internet/network and communications facilities with any person, other than when it is necessary for maintenance or repairs by the IT Support Team. Where it has been necessary to share a password, the user should change the password immediately when it is no longer required by other person.
- 9.6** Users must ensure that confidential information, personal data, and other sensitive information is kept secure. The security of personal data in particular is governed by the College's Data Protection Policy, which users must comply with at all times when handling personal data. Workstations and screens should be locked when the user is away from the machine and hard copy files and documents should be secured when not in use.
- 9.7** If a user has been issued with a laptop, tablet, smartphone, or other mobile device, that device should be kept secure at all times, particularly when travelling. Mobile devices must be password-protected and, where more secure methods are available, such as fingerprint recognition, such methods must be used. Confidential information, personal data, and other sensitive information stored and/or accessed on a mobile device should be kept to the minimum necessary for the user to perform their duties. Users should also be aware that when using mobile devices outside of the workplace, information displayed on them may be read by unauthorised third parties, for example, in public places and on public transport.
- 9.8** When opening email from external sources, users must exercise caution in light of the risk malware, spyware, viruses, and other malicious software or code pose to system security. Users should always ensure that they recognise a sender and know what an attachment is before opening one. If a user suspects that their computer has been affected by a virus, they must contact the IT Support Team immediately.

10. MONITORING

- 10.1** To the extent permitted or required by law, the College may monitor users' use of the College's internet/network and communications facilities for its legitimate business purposes which include (but are not necessarily limited to) the following reasons:



- 10.1.1** To ensure college policies and guidelines are followed, and standards of service are maintained;
 - 10.1.2** To comply with any legal obligation;
 - 10.1.3** To investigate and prevent the unauthorised use of the College's internet/network and communications facilities and maintain security;
 - 10.1.4** If the College suspects that a user has been viewing or sending offensive or illegal material (or material that is otherwise in violation of this policy or of the Acceptable Use Policy);
 - 10.1.5** If the College suspects that a user has been spending an excessive amount of time using the College's internet/networking and communications facilities for personal purposes.
- 10.2** Users should be aware that all internet/networking and email traffic data sent and received using the College's internet/networking and communications facilities is logged, including websites visited, times of visits, and duration of visits. Any personal use of the internet will necessarily therefore be logged also. By using the College's internet/networking and communications facilities for personal use, users are taken to consent to personal communications being logged and monitored by the College. The College shall ensure that any monitoring of users' use of the College's internet/networking and communications facilities complies with all relevant legislation including, but not limited to, the GDPR (EU Regulation 2016/679 General Data Protection Regulation) and the Human Rights Act 1998.
- 10.3** When monitoring emails, the College will normally restrict itself to looking at the address and heading of the emails. However, if it is considered necessary, the College may open and read emails. Users should be aware that sensitive and confidential communications should not be sent by email because it cannot be guaranteed to be private. Users are reminded that any permitted personal emails should be marked as "personal" in the subject line.

11. MISUSE AND COMPLIANCE

- 11.1** Any user found to be misusing the College's internet/networking and communications facilities will be treated in line with the College's relevant Disciplinary Policy and Procedure. Misuse of the internet can, in some cases, amount to a criminal offence.
- 11.2** Where any evidence of misuse of the College's internet/networking and communications facilities is found, the College may undertake an investigation into the misuse in accordance with the College's relevant Disciplinary Policy and Procedure. If criminal activity is suspected or found, the College may hand over relevant information to the police in connection with a criminal investigation.

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