

Office 365 provision to clergy: Policy and procedure for use

Policy Statement

The Representative Body provides Office 365 licenses to stipendiary and non-stipendiary clergy, plus other people specifically nominated by Diocesan Secretaries or Bishops. These licenses are subject to the usage restrictions contained in this document and access to the system will only be provided if agreement to those provisions has been granted.

Policy Application

The policy applies to all users of the system. It is designed to protect individual data, corporate data, programmes, hardware and the network as a resource for the entire organisation. The following policy and procedure set out the rules and behaviours expected from all people who use the system.

Procedure

- Overall computer security is the responsibility of the Head of ICT Department reporting to the Chief Executive of the Representative Body.
- Individual signatories to the policy are responsible for ensuring compliance with the policy.
- All signatories to the policy are provided with an Office 365 license for online use only.
- All signatories to the policy must use the applications within Office 365 for work purposes only.
- All signatories to the policy must use the OneDrive and SharePoint storage systems contained within Office365 to store work related data only.
- All data held on the Office365 account should be regarded as being ultimately owned by and subject to the controls of the Representative Body of the Church in Wales.
- All signatories to the policy will be compelled to observe and maintain the ICT Department's password policy which requires a specific level of complexity, regular password changes and may be periodically subject to revision. Signatories will also be required to comply with two factor authentication standards when these are introduced.
- All signatories to the policy are entitled to use the services of the ICT Helpdesk available through the helpdesk@churchinwales.org.uk email address.

- Access to Office365 will only be gained through the use of a personal password. Such passwords must not be given to any other person, must not be written down and must not be stored on a PC except using a properly encrypted system approved by the ICT Department.
- Provision of Office365 facilities to clergy provides a Church in Wales email address by default. This email address may only be used for work purposes.
- Email security is provided by Microsoft and the ICT helpdesk but signatories to the policy are required to take reasonable steps to protect themselves by not clicking on links contained in emails from unknown senders and by notifying the helpdesk of possibly fraudulent emails on receipt.
- All signatories to the policy are expected to have a reasonable understanding of the requirements of the General Data Protection Regulation (<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>) and to take steps to ensure that their work and storage of digital information complies with the act. The IT Helpdesk can provide security advice on request.
- Signatories to the policy should not expect that their Office365 accounts are completely private. They are provided by the Representative Body and, as such, are administered by the ICT Department. Occasional access for maintenance purposes may be necessary. In addition, access to those accounts may be required as part of Subject Access Request or as a part of an authorised investigation.
- The ICT Department aim to maintain the highest standards of integrity with respect to accessing provided accounts. They will only do so in the circumstances outlined above or with the explicit authorisation of the account holder. Any member of the ICT Department that breaches this protocol will be subject to disciplinary investigation.
- Office365 is an entirely cloud based system. As such, all access to accounts does not require access to individual PCs or personally owned devices. The ICT Department will never access those devices and will confine any actions to the cloud based infrastructure provided by the Representative Body.
- Account provision is conditional on holding a role within the Church in Wales. Accounts will be terminated when that role concludes.

GDPR and Subject Access Requests

Signatories to the policy should be aware that provision of a Church in Wales Office365 account may widen their accountability in terms of Subject Access Requests made under the General Data Protection Regulations. The accounts are a component part of the Church in Wales network managed by the Representative Body, which means that any data held therein, in email or as files, may fall in scope for a response to a general Subject Access

Request made to the Church as a whole. As such, the data and files held in those accounts will be searched by the ICT Department as part of a response to such a request and the returned data provided to the applicant.

Example

A person submits a Subject Access Request to the Representative Body asking for all emails and files containing their name. The ICT Department will conduct a search on all Church in Wales email accounts for emails that contain that name. The returned dataset would generally then be reviewed by a member of the Representative Body's Legal Department to ensure that all returned references are pertinent to the query. The redacted dataset would then be provided to the person who made the initial request.

It must be understood that:

1. Provided clergy accounts fall under the scope of general Subject Access Requests made to the Church as a whole
2. Individual clergy accounts can be subject to specific Subject Access Requests

Investigatory process

Under the terms of the Computer Misuse and Security Policy as it applies to Church in Wales staff, individual user accounts can be investigated at the request of a line manager. If inappropriate behaviour is suspected, line managers are empowered to request the Head of ICT to undertake an investigation within stipulated parameters.

This policy creates a parallel system for Office365 clergy accounts provided by the Representative Body. As such, Bishops or the Chief Executive of the Representative Body may authorise the ICT Department to undertake investigations into accounts held by individuals that fall under their ultimate line management. For accounts that have been provided at the request of Diocesan Secretaries, investigations may be undertaken at their request. Individuals are not notified when an investigation has been requested.

Leon Hughes, Head of Communications and Technology, Church in Wales
February 2021.

Acknowledgement of Office 365 provision to clergy: Policy and procedure for use

This form is used to acknowledge receipt of, and compliance with, the Church in Wales Office 365 provision to clergy: Policy and procedure for use.

PROCEDURE

Complete the following steps:

1. Read the Office 365 provision to clergy: Policy and procedure for use
2. Sign and date in the spaces provided below
3. Scan or digitally photograph this page only and return it to the nominated person at your DBF office (davidhammond-williams@churchinwales.org.uk)by email or to helpdesk@churchinwales.org.uk who will forward to the correct person.
4. If you are unable to scan or photograph this page, you may instead post the signed copy of this document to Robert Jones at the Bangor Diocesan Office.

SIGNATURE

By signing below, I agree to the following terms:

- i. I have received and read a copy of the “Office 365 provision to clergy: Policy and procedure for use” and understand the same.

Signature

Name

Date

Diocese