# **Employee Communications**



**Policy** 

# Category

Technology

## **Governance Council**

**Technology Council** 

# **Primary Contact**

Bill Schuetz

## **Contact Email**

schuetzb@lanecc.edu

# **Responsible Executive Authority**

Chief Information Officer

# **Purpose**

To increase employee awareness of communication protocols that respect student and employee privacy, prevent the disclosure of sensitive information, adhere to applicable law, and establish email as the official internal communications medium of the college.

### **Narrative**

To respect student and employee privacy, and adhere to privacy, data retention, and other applicable laws, Lane employees must have knowledge of policies, procedures and legal issues that govern employee practices when communicating college business.

## **Public records**

In Oregon, every person has a right to inspect any public record of a public body in this state, except where explicitly excluded by Oregon's public records law. (ORS 192.501 to 192.505).

These public records consist of any writing pertaining to the public's business, regardless of when the writing is written, to whom or where the writing is stored. This includes anything done on college computers, and also includes all college business, including files and emails, stored or sent on personal computers or devices. Regarding email, this includes spam, advertisements, and personal emails sent on college computers or through college provided email. Any employees affected by a <u>public records request</u> at Lane will be notified in accordance with employment contracts. Remember that your college email is never private.

## Records retention

There are additional requirements based on state regulations that govern retention of public records. Communications with retention requirements should occur only in forms that can be retained for the required time period. For example, correspondence related to developing and/or providing an employee in-service or training has a five-year retention requirement (records retention schedule part 166-450-0090(13)). This means that if you are discussing training or in-service committee work in a chat program, and that chat program does not retain a history of messages for at least five years, the committee's conversation may not happen via that chat application. Employees are encouraged to review the appropriate records retention schedule or consult with the college archivist.

# Legal discovery

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Any college business conducted via a personal account or device may be subjecting that account or device to a legal discovery request and/or may be creating a privacy issue that violates federal FERPA (Family Educational Rights and Privacy Act) requirements. Consider this scenario: John Doe, an instructor at Lane with the email address doej@lanecc.edu, automatically forwards email to his personal address (john.doe@example.com). A student emails the instructor specific questions about her last test grade, and includes personally identifiable information so that the instructor can contact her. In this situation, John has potentially created a FERPA violation by forwarding that email to his example.com account, since he has provided protected information to a third party who can now read that email. Additionally, since John's example.com email address has been used to conduct public business, John's personal email and devices are now discoverable in a lawsuit and he may need to produce emails from his personal account in response to a public records request.

## **Employee Communication requirements**

- Organizational units that manage their own digital communications are expected to ensure that their digital records adhere to retention, access, and privacy laws.
- 2. Employees are expected to check their email on a regular basis in order to stay current
- b with college-related communications. Managers will provide computer access to
- employees whose positions do not provide them with regular access to a computer, as
- d well as a reasonable amount of time to use the computer provided for the purpose of
- e checking their email.
- 3. Email is an important method for communicating with students. It communicates with
- its appearance as well as its message. Identifiers such as signatures should include
- standard information such as name, position, and college name, and should not contain
- disclaimers of any kind. Employees may wish to consult the College Graphic Standards
- e for examples.
- 4. In the interest of institutional integrity, professionalism, privacy, and adherence to applicable law (e.g. DAS 107-004-110) and Board policy, employees are expected to:
  - communicate in a way that protects the privacy of student information and educational records (FERPA);
  - refrain from communicating private student or employee information via text message;
  - o refrain from using personal email accounts to conduct college business;
  - o not use college email, phones, or other communication mediums for commercial, religious, or political mailings, except as allowed in employment contracts;
  - o refrain from false, unlawful, offensive, or disruptive content in email
    - o refrain from viewing, downloading, storing, transmitting, or retrieving any
    - 2 information, communication or material which: is harassing or threatening; is
    - obscene, pornographic or sexually explicit; is defamatory; makes discriminatory reference to race, age, gender, sexual orientation, religious or political beliefs,
    - national origin, health, or disability; is untrue or fraudulent; is illegal or promotes
    - illegal activities; is intended for personal profit; condones to foster hate, bigotry,
    - $\Rightarrow$  discrimination or prejudice; facilitates Internet gaming or gambling; or contains  $\varphi$  offensive humor.
  - onot be used to lobby, solicit, recruit, sell, or persuade for or against commercial ventures, products, religious or political causes or outside organizations.
  - o not use college communication systems for personal gain; except as allowed under government ethics laws;

- check and respond to emails warranting a response with a frequency and regularity commensurate with your position at the college.
- 5. Recognize that emails sent to large groups can sometimes result in multiple replies
- 2 sent via "Reply All," and that this can cause inconvenience or even difficulty for some
- members of the college community. Per the **Email Distribution List Policy** [Link to policy once adopted] employees should use the BCC field for messages sent to large groups.
- In the academic tradition of free and open discussion, employees sending large group
  - mailings are expected to include a statement that identifies the recipient groups (e.g.
- division faculty, department staff, manager group, etc.).

# Related Policies, Procedures, and References

- FERPA
- ORS 192
- ORS 244
  - o ORS 244.025
  - o ORS 244.040
- DAS 107-004-110
- Records Retention Schedule
- Email Policy Manual for Local Government
- Lane Technology Request Form
- Public Records Requests
- Section 504 guidelines of the Rehabilitation Act

# **Date Adopted**

Wednesday, January 3, 2018

## **Date Last Reviewed**

Wednesday, January 3, 2018

# **Technology Accessibility**

## **Type**

Policy

## Category

Technology

## **Governance Council**

**Technology Council** 

## **Contact Email**

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# **Responsible Executive Authority**

Chief Information Officer

# Purpose

Establish that Lane Community College is committed to equity and access in electronic communications technology for students, employees, and community members.

## Narrative

The college supports the procurement of accessible technology, and the creation of accessible content for students, employees, and visitors, and adherence to Section 504 and Section 508 of the Rehabilitation Act.

## **Content Creation**

All electronic content created by the college, except where explicitly excluded by Section 508, must adhere to the guidelines established in the <u>Section 508 guidelines</u>.

# **Technology Procurement**

- The college must ensure that any technology procured, whether hardware or software must
- meet accessibility guidelines as outlined by Section 255 of the Communications Act and/or
- 3 Section 508 of the Rehabilitation Act.

## **Definitions**

- Software: Operating systems, network operating systems, computer applications, cloud-based software, or software services (SAAS.)
- Hardware: The computer hardware referenced in this article refers but is not limited to computers, tablets, printers, document cameras, scanners, projectors and related technology equipment purchased by any employee on LCC campuses or sites with College funds.

# Related Policies, Procedures, and References

Text of the Standards and Guidelines

Text of the Standards and Guidelines - E206 - Hardware

Telecommunications Access for People with Disabilities

Information Technology: Software Purchasing and Requests

Information Technology: Hardware Acquisition

UPDATE IT SOFTWARE PURCHASING AND REQUIREMENTS & HARDWARE ACQUISITION POLICIES to include this policy as a criteria

# **Date Adopted**

n/a

### **Date Last Reviewed**

n/a

# Information Technology: Email Distribution List Policy

# Type

**Policy** 

# Category

Technology

# Department

Information Technology

## **Phone**

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# **Primary Contact**

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### **Contact Email**

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# **Responsible Executive Authority**

Chief Information Officer

# **Purpose**

To specify the appropriate use of college email distribution lists as well as personally created email distribution lists. The electronic mail function which enables sending messages to college distribution lists should only be used for messages relating to college business.

## **Narrative**

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Only messages directly related to college business should be distributed using college distribution lists. When sending messages using distribution lists, the blind copy (BC) field (not the To: or CC: field) must be used to avoid chain responses being sent to everyone in the list. When sending to a distribution list, the sender should include an opening statement that identifies the recipient groups (e.g. To:Division Faculty, To:Department Staff, To:Manager Group, etc.). Finally, employees that create personal distribution lists must promptly remove members who ask to be removed and identify intended recipients in the same manner as done for college distribution lists.

General information of collegewide interest should be distributed through the Lane Weekly.

The purpose of this policy is:

- 1. To minimize network traffic;
- 2. To minimize staff reading time which equates to wasting limited resources;
- To ensure college resources are used for college business (and not for peripheral or superficial issues);
- 4. To maintain the solemnity of college distribution lists; i.e., when a message appears addressed to a distribution list it should be regarded as highly important for each member of that distribution list and read immediately.

## Related Policies, Procedures, and References

**Employee Communications Policy** 

**Date Adopted** 

Friday, May 17, 2019

**Date Last Reviewed**