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**1. Introduction**

1.1 It is recognised that many colleagues already work occasionally from home e.g. preparing material, assessing work, carrying out research etc. The objective of this policy is not to undermine existing work practices or impose unnecessary restrictions. Rather, the objectives are to:-

* ensure the health and safety of all colleagues;
* to provide all colleagues with the equality of opportunity to work from home and
* to ensure that colleagues are aware of their obligations in relation to information security, data protection, freedom of information and records management.

1.2 In order to achieve our strategic goals we will continue to need a trained, skilled and motivated workforce. The provision of flexible forms of working, including home-working, will play an important part in our ability to attract and retain the best possible colleagues.

## *1.3 When considering home-working the needs of our business will always take priority and those who are allowed to work from home must comply with this policy.*

1.4 Under the Equality Act 2010, a person is disabled if “they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities”. This means that employers of disabled people, such as the University, must consider making ‘reasonable adjustments’ to help staff overcome disadvantage resulting from an impairment. This can include home-working under certain circumstances.

1.5 If a member of staff wants to have home-working considered as a reasonable adjustment it should be requested under the [Flexible Working Policy](https://staff.napier.ac.uk/services/hr/Documents/Policies/Flexible%20Working%20Policy%20August%202015.doc).

1.6 This policy should not be used to accommodate caring responsibilities. The University has developed a number of other work/life balance policies to enable colleagues to undertake caring responsibilities for dependants where required.

**2. Scope**

2.1 It is our policy to support the provision of home-working wherever possible. All colleagues have the opportunity to apply to work from home. Line managers will assess the suitability of home-working and should consider the implications with those likely to be affected. Suitability will be based on determining whether the role and the person are suitable for home-working and that a self assessment checklist has been completed. All requests will be considered carefully and will only be declined if there is a “[justifiable reason](#Justifiable_reasons)” for doing so. Justifiable reasons for refusing a home-working request are detailed in **Appendix 1.**

2.2 This policy should be read in conjunction with the University’s standard policies & procedures, which apply equally when working from home.

**3. Principles**

3.1 The policy will provide the following:-

1. framework within which colleagues and managers can agree arrangements for working from home;

(b) fair and consistent arrangements for colleagues to work from home;

(c) Clear guidelines on how the University will manage and review home-working;

(d) Guidance to managers on how to assess suitability for home-working

**4. Home-working**

4.1 Home-working is a form of flexible working, in which a person’s home is used as a place of work for all or some of their working week. The University defines three types of home-working: occasional, regular and permanent.

**4.2 Occasional home-working**

(a) This applies to colleagues who work at home on an occasional/ad hoc basis even though their contract of employment requires them to be based at an Edinburgh Napier University campus. Colleagues must have the agreement of their line manager.

(b) Occasional home-working may be appropriate for certain roles in one or more of the following circumstances:-

* To allow colleagues the opportunity to work more effectively on a particular piece of work where concentration is important and to avoid interruptions that are part of the office environment;
* To provide a solution to a temporary problem where colleagues may be unable to travel to the office.

4.3 Conditions for occasional home-working

(a) All occasional home workers must complete the Health and Safety Checklist detailed in **Appendix 2** when they first undertake occasional home-working (and again **only if any major changes occur**).The completed form should be given to their line manager and will help the University ensure that their working conditions at home are safe and without risk to health. If a risk / hazard is identified, the departmental Risk Assessor should be notified so that appropriate action can be taken.

(b) There are some roles where occasional home-working is current practice. In these circumstances the local arrangements for contact currently in place will continue to apply.

(c) The line manager has the right to refuse the request for operational or practical reasons e.g. the maintenance of service levels, impact on team.

(d) The nominal “normal place of work” remains the University and colleagues may not claim travelling expenses between home and their normal place of work.

(e) The home-working arrangement can be reviewed at any time, with reasonable notice (one month) and with justifiable reasons by line manager, for further details see **Appendix 1**.

(f) The line manager can request that the colleague attends their normal place of work on any normal working day e.g. to attend meetings, cover sickness etc.

(g) Colleagues working from home should be readily contactable, normally by email and by telephone if agreed during normal working hours.

4.4Regular home-working

(a) This applies to colleagues who work at home regularly having made a flexible working request, in line with the Universities Flexible Working Policy, for part of their contracted hours even though their contract of employment requires them to be based at Edinburgh Napier University.

(b) Regular home-working may be appropriate for certain roles in one or more of the following circumstances:-

* Where the colleague’s presence is regularly required on campus but not all the time;
* To cut down on the amount of time spent commuting.

4.5 Conditions for regular home-working

(a) All regular home-workers must comply with point (f) in section 4.3.

1. All regular home-workers must complete the on-line [Homeworker assessment on Essential Skillz](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/training/Pages/eLearning.aspx) .

The home-worker should make their manager aware of the outcome of the risk assessment by attaching a copy to their Flexible Working Application Form, and if a risk / hazard is identified, the departmental Risk Assessor should be notified so that appropriate action can be taken.

(c) The regular home-worker will need to accept that to cope with this flexible working pattern their desk on campus may be used by other colleagues.

4.6 Permanent **home-working**

(a) This applies to colleagues who work from home for the entirety of their contracted hours and do not retain a desk on campus. Their main place of work is home and they may be mobile on some days (visiting different campuses/different locations).

(b) Permanent home-working roles will either be advertised as such or may be made through a flexible working request.

(c) Official home-working may be appropriate for certain roles in one or more of the following circumstances:-

* Colleagues who are not obliged to be present at their campus
* Colleagues who do not require a dedicated desk space on campus
* Colleagues who are mobile, visiting different campuses/locations

4.7Conditions for permanent home-working

(a) The permanent home-worker must comply with points 1 and 2 in section 4.4.

(b) Colleagues should agree their deliverables and objectives, which will be reviewed regularly by their line manager.

(c) The nominal “normal place of work” will be their ‘home’ and colleagues may claim travelling expenses between their normal place of work and University campuses.

(d) The line manager can request that the colleague attends campus, by providing reasonable notice (e.g. 24 hours in advance)

(e) The colleague will need to accept that to cope with this flexible working pattern they will not retain a desk on campus and that they will have to use alternative equipment (pc, desk etc) when they attend the office or campus for meetings, appraisals, training days etc.

**5. Requesting Home-Working**

5.1Requesting occasional home-working

All requests for occasional home-working by colleagues must be made to, and have agreement from, their line manager. This can be on a role basis (e.g. lecturers) or individual basis. Normally managers will meet with applicants to discuss their request.

5.2Requesting regular or permanent home-working

Regular or permanent home-working is a form of flexible working and colleagues wishing to request regular/permanent home-working should apply using the application form in the Flexible Working policy. The line manager should follow the procedure outlined within that policy, holding any meetings as required. Any agreed changes to working arrangements will be reflected in revised terms and conditions of employment.

## *5.3* Application outcome

Line managers will assess the suitability of home-working and will consider the implications with those likely to be affected, suitability will be based on determining whether the role, the person and the home, are suitable for home-working.

5.4 Within **14 working days** after the date of the meeting, the line manager will write to the colleague:-

* either agreeing to the new work pattern with confirmation of a start date; or
* providing clear business ground(s) as to why the application cannot be accepted and the reasons why the ground(s) applies in the circumstances.5.3.1 Application accepted

## 5.5 If the request for occasional home-working is supported then this will apply on an ad-hoc basis as and when required and agreed.

## 5.6 If the request for regular or permanent home-working is supported the line manager must follow the process outlined in the Flexible Working Policy, notifying The People Team using an Employment Details Change form.

### 5.7 The colleague will continue under the normal University policies and procedures when working from home, in particular the relevant Information Services and Health and Safety policies, as detailed in Appendix 3.

### 5.8 Line managers will remain responsible for supervising colleagues working from home, ensuring objectives agreed in the PDR are achieved. Line managers will inform colleagues of meetings or training sessions that they may need to attend and will ensure that members of colleagues are kept up to date with information relevant to their work.

5.9 Application Rejected

The University may refuse an application for home-working, using a justifiable reason as outlined in the Flexible Working Policy and detailed in **Appendix 1.** Colleagues have the right to appeal against the line manager’s decision not to accept their flexible working request.

**6. Appeal Procedure**

6.1 The colleague has the right of appeal against the decision not to accept their request for home-working within **14 working days** of the decision being notified to them. The appeal process will encourage both the colleague and the University to reach a satisfactory outcome. The University will carefully consider the grounds for the appeal and will notify the colleague in writing of the decision. Appeals will be heard using an appropriate stage of the grievance procedure.

**7. Insurance Cover**

7.1 Colleagues are advised that working from home may affect the provisions of any home and contents insurance policy, although this should not affect their premium. It may also affect mortgage provisions. Colleagues should therefore inform their insurers/mortgagors/landlord before commencing home-working and accept that it is their responsibility to inform their landlord/mortgage/insurance company that they are home-working.

7.2 Colleagues should ensure that all University-owned property is used appropriately and responsibly and that all reasonable precautions are taken to prevent damage and theft. Any damage or theft of University property must be reported to the line manager immediately.

7.3 All colleagues working at home are covered by the University’s Employer’s Liability Insurance and Public Liability Insurance providing the rules of this policy have been followed.

**8. Communication And Contact**

8.1 Communication arrangements must be robust. Colleagues working from home should be readily contactable, normally by email and by telephone, if agreed, during normal working hours.

8.2 Home workers must let their line manager or colleagues know in advance (where appropriate) of any times they will be out e.g. at business meetings, visiting other campuses etc. An efficient method of communicating their whereabouts is through the use of the Edinburgh Napier University Outlook calendar. For details on training go to: <https://staff.napier.ac.uk/services/cit/Events/Pages/IT-Training.aspx>.

8.3 For colleagues working from home, it is essential that the line manager maintains regular contact with the colleague during normal working hours. Managers must ensure that all communication is reasonable and be alert to the signs and symptoms of stress in colleagues for whom they have supervisory responsibility. Colleagues working from home should be included in the PDR process and should receive all usual colleagues’ communications, notices etc.

**9. Information Security, Data Protection and Freedom of Information & Records Management**

9.1 All colleagues working from home must ensure that they adhere to the University’s policies, procedures and guidance in relation to Information Security, Data Protection and Freedom of Information.

9.2 Information security

Colleagues must comply with University [Information Security Policy](http://staff.napier.ac.uk/services/cit/infosecurity/Pages/InformationSecurityPolicy.aspx), which provides guidance on the security of electronic information systems.

9.3 Data protection

All colleagues must ensure that they understand their obligations under the Data Protection Act and take appropriate security measures to protect personal data, held on electronic systems, physical devices or in manual format, from unauthorised loss, destruction, corruption or disclosure. The University’s Data Protection Code of Practice provides detailed guidance on the [security of personal data](https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/SecurityofPersonalData.aspx):

9.4 In addition colleagues should ensure that they are aware of and comply with the [Manual and Physical Data Security Policy](http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Documents/Manual%20and%20Physical%20Data%20Security%20Policy%202015-04-22.pdf).

Further information and practical guidance is given in **Appendix 4**.

9.5Freedom of information & records management

All colleagues are expected to comply with the [records management policy](https://staff.napier.ac.uk/services/governance-compliance/governance/records/Documents/Records%20Management%20Policy%202015.pdf).

Further information and practical guidance is given in **Appendix 4**.

**10. Reporting Absence and Booking Leave**

10.1 All other University policies and procedures apply and home-workers should comply with the Managing Sickness Absence policy at all times. Colleagues should book time-off in agreement with their line manager as per their department’s local arrangements.

**11. Trial Period**

11.1 The home-working arrangement could be offered on a trial basis and reviewed after an agreed time (e.g. three to four months) to assess whether it works in practice. Examples could include: its effectiveness; the impact on colleagues; how office/work space has been affected within the School/Service. The Health and Safety checklist must be reviewed on an annual basis.

11.2 Consideration should be given to additional support or development/training opportunities or terminating the home-working arrangement if home-working proves unsuitable for particular colleagues – this can be temporary or permanent.

**12. Termination of Home Working**

12.1 If business or personal circumstances change, these should be raised at the earliest opportunity to do so, by either the line manager or colleague.

12.2 In cases where the home-working arrangement cannot be continued a one-month period of notice on either side should be given before the post reverts to being office-based.

12.3 If colleagues do not meet the requirements of the home-working policy and procedure, are not available for work, or to colleagues and students, or are unable to be contacted then the home-working arrangement may be terminated, and the colleague will be required to be on campus during usual working hours.

**Appendix 1 - Reasons For Declining a Request for Home-Working**

## REASONS FOR DECLINING A REQUEST FOR HOME-WORKING

The University may refuse the request for flexible working arrangements, and justifiable reasons for refusal can include one or more of the following:-

* The burden of additional cost
* Detrimental effect on ability to meet customer demand
* Inability to reorganize work amongst existing staff
* Detrimental impact on quality
* Inability to recruit additional staff
* Detrimental impact on performance
* Insufficiency of work during the periods the colleague proposes to work
* Planned structural changes

## *In addition to the justifiable reasons set out in the Flexible Working Policy, listed above, a request for home-working is unlikely to be approved, on either a regular or permanent basis, if the line manager also considers that:*

1. The colleague needs to be present in the office to perform their job (for example, because it involves a high degree of personal interaction with colleagues, students or third parties or involves physical access to central filing systems/ central resources or equipment that is only available in the office. In addition building/ campus based work would fall into this category e.g. caretaking, maintenance, security duties).

2. The colleague’s conduct/ performance is unsatisfactory.

3. The colleague needs supervision to deliver an acceptable quality and/or quantity of work.

**Appendix 2 - Homeworkers Health and Safety Self-Assessment Checklist**

**HOMEWORKERS HEALTH AND SAFETY**

**SELF ASSESSMENT CHECKLIST**

*Please complete this checklist when you commence home-working (and again* ***only if any major changes occur****). The completed form should be given to your line manager and will help the University ensure that the working conditions in your home are safe and without risk to health. Once completed and signed this form should be returned to The People Team.*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Name: |  | | School/Service: |  |
| Home Address: |  | | Job Title: |  |
|  | | | Home contact number: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |
| Details of any room/space used for home working: | |  | | |
|  | | | | |
|  | | | | |

Please tick to confirm the following

|  | *Yes* | *No* |
| --- | --- | --- |
| The room / area used is accessible without climbing a ladder? |  |  |
| All walkways are clear of tripping hazards, such as trailing cables? |  |  |
| There is suitable and sufficient ventilation? |  |  |
| There is adequate light - natural and artificial? |  |  |
| I have completed the online Essential Skillz Homeworking assessment. Information on accessing Essential Skillz can be found [here](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/training/Pages/eLearning.aspx). |  |  |
| The electrical equipment in my workspace does not have any signs of damage? *Look for the obvious faults, such as loose cables, cracked plugs, split covering to leads etc. This is a visual inspection only – you should not open or take covers off the equipment.* |  |  |
| I have a smoke alarm fitted.  *It is strongly recommended that you fit a smoke alarm. This should be tested weekly to ensure that it is working.* |  |  |
| I have an escape plan in case of fire. |  |  |
| I know what to do in the event of having an accident at home? *All work related accidents, including those that take place in their home whilst working, must be reported using the University accident forms available in each School/ Service.* |  |  |
| I have access to first aid arrangements and guidance. |  |  |
| My home area is secure. My laptop and confidential University files will be locked away when not in use. |  |  |

|  |
| --- |
| Please comment where you have ticked “No” to the questions above or where you have any concerns about their working conditions or any other health and safety concerns? |
|  |
| Please detail the action that is to be taken, if any, to address any issues highlighted in the assessment |
|  |

All University Health & Safety policies apply equally when working from home, these can be found at. <https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/policies/Pages/Policies-A-Z.aspx>.

Further information on Home-working can be found on the HSE website <http://www.hse.gov.uk/pubns/indg226.pdf>

**Employee’s Signature: ………………………………………….. Date:………………….**

**Line Manager’s Name: …………………………………………... Date:………………….**

**Line Manager’s Signature: …………………………………………... Date:………………….**

**Appendix 3 - Agreeing a Home-Working Arrangement**

# AGREEING A HOME-WORKING ARRANGEMENT

### 1. Health and Safety

The hours to be worked at home must be agreed formally and must comply with the colleague’s contractual hours of work.

Under the Health and Safety at Work Act, colleagues working at home are required to take reasonable care of their own health and safety, to comply with all aspects of the University [Health & Safety Policy](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/policies/Documents/management%20of%20health%20and%20safety%20-%20policy%20arrangements.pdf) and to read and follow the [Organisation and Responsibilities for Health and Safety](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/policies/Documents/organisation%20and%20responsibilities%20nov%202017%20final.pdf)

To co-operate with the University as necessary to comply with statutory obligations, and to complete the online [Homework assessment on Essential Skillz](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/training/Pages/eLearning.aspx)

**2. Work related stress**

Colleagues need to be aware of time management issues and social isolation. It’s important to maintain good communications systems and formal means of contact with their line manager and colleagues to avoid feelings of isolation.

For further details go to [Stress Management](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/guidance/Pages/Stress.aspx).

**3. Accidents / Near Misses at work**

Colleagues who sustain an injury or have an accident while working from home are required to follow [University Accident Procedures](https://staff.napier.ac.uk/services/governance-compliance/healthandsafety/policies/Documents/accident-policy-full.pdf) for reporting such incidents.

### 4. Personal Details and Safety

Colleagues are advised not to reveal their home address and telephone number to other colleagues of the University. If a postal address needs to be given out, it should be that of the School/Service at a University campus. Arrangements should be made for the collection/forwarding of post. Only mobile telephone numbers or a University telephone number should be given out. Arrangements can be made to divert telephone calls from a University extension to the home-workers home telephone number or mobile number. Home-workers are advised that they must not meet students or other University customers at home. Suitable arrangements for meetings should be discussed with the line manager. In addition, personal email accounts should not be used for business purposes.

For colleagues working permanently at home they may need to admit authorised visitors to their home for the following reasons:

* Inspection of working arrangements and equipment for health and safety reasons;
* Delivery and installation of equipment and furniture;
* Repairing and servicing of university equipment;
* Meeting with the line manager.

All visitors will give reasonable advance notice and carry proper identification which should be asked for before admitting them.

Further information is available from the [Health & Safety Executive](http://www.hse.gov.uk/pubns/indg226.pdf):

### 5. Information Services Equipment and Resources

Colleagues must comply fully with the University [Information Security Policy](http://staff.napier.ac.uk/services/cit/infosecurity/Pages/InformationSecurityPolicy.aspx), which provides guidance on the security of electronic information systems.

Full details of all relevant Information Services policies and guidelines for homeworking can be found at: <http://staff.napier.ac.uk/services/cit/OffCampusServices/Pages/HomeWorking.aspx>

Further details on software for home use can be found at: <http://staff.napier.ac.uk/services/cit/OffCampusServices/SoftwareHomeUse/Pages/SoftwareHomeUse.aspx>

**6. Tax and Expenses**

Furniture will only be provided by the University where the colleague is working permanently from home, or as a reasonable adjustment under the Equality Act 2010. Furniture is a taxable benefit and will be declared on the annual P11D form and the colleague will be taxed on 20% of the market value of the item when it was first provided.

**7. Broadband**

Broadband will only be provided by the University where the colleague is working permanently from home, or as a reasonable adjustment under the Equality Act 2010. It is expected that most colleagues will already have a broadband connection.

**8. Additional household expenses**

The University may only pay reasonable additional household costs where the colleague is working permanently from home, or where it may be considered as a reasonable adjustment under the Equality Act 2010. In considering whether the adjustment is “reasonable”, the University will consider financial and other costs of the adjustment, together with considering the extent of any disruption caused. Where it is agreed that the adjustment is reasonable a rate of £3 per week (pro-rated for the permanent homeworker working 3 or 4 days at home) will be paid towards additional expenses such as electricity and gas. This will be paid monthly through payroll.

If a room in the home is used for business purposes only it could attract business rates and may attract capital gains tax on selling the property.

Where there are additional household expenses these will be approved by the Dean of School/ Director of Service

**Appendix 4**

**Data Protection, Freedom of Information and Records Management Guidance**

This Appendix gives general guidance to all University colleagues who work at, or from, home on a regular or occasional basis to ensure that:-

* any University work or data is protected from loss, unauthorised access and/or exploitation;
* the University can comply with its obligations under the Freedom of Information (Scotland) Act 2002 (FOISA) and the Data Protection Act 1998 (DPA) in respect of records and any requests that may be received under either Act.

This guidance applies to:

* any colleague undertaking academic, administrative, research or teaching related work at home; and
* information in all formats, including paper files, electronic data on PCs, or downloaded to physical devices e.g. CDs, DVDs & USB sticks and emails.

**Compliance with DPA and FOISA**

Both Acts:

* apply to any information which is created and received as part of the colleague’s employment or research with the University, regardless of where they work and store that information;
* confer rights to request records from the University;
* have deadlines by which the University must respond to these requests; the University must therefore know what information is held and be able to retrieve that information when key colleagues are out of the office on leave or sickness absence
* require appropriate records retention practices;
* impose financial penalties\* and other sanctions for non-compliance.

**\*Note that significant financial penalties to a maximum of £500,000 can be imposed for serious breaches of the Data Protection Act.**

FOISA also imposes obligations on the University under a statutory Code of Practice to maintain good records management practices and this includes records created and/or held at home.

**Interaction between DPA and FOISA for home working purposes**

|  |  |  |
| --- | --- | --- |
|  | **DATA PROTECTION ACT 1998** | **FOI (Scotland) ACT 2002** |
| **Geographical**  **coverage** | UK | Scotland |
| **Applies to** | All organisations | Scottish public authorities only – estimated to be 10,000 |
| **Scope** | Covers the processing by the University of personal data about living individuals. Individuals have the right to request access to their personal data held by the University. | Covers information we hold i.e. create or receive in our activities as a public sector body. Individuals or organisations have a general right of access to information from public bodies. |
| **Timescales for requests responses** | 40 calendar days | 20 working days |
| **Record Retention** | No longer than is necessary. See relevant University records retention schedule. | Defined periods according to the relevant University records retention schedule |
| **Storage of records** | **Manual**: secure storage i.e. locked filing cabinet/desk.  **Electronic**: encryption recommended; use personal “H” drives and restrict access to any shared networks | Do **not** store the master record at home as this means no-one else can gain access to it. Update and back up records to University systems regularly in case of accidental loss or computer malfunction |

**Risks, potential consequences and mitigating actions**

The key risks are accidental/unauthorised loss, access to and/or amendment of University records. These events can occur as a result of:-

* leaving confidential or sensitive records in household areas where they may be seen by household members or visitors;
* a crime e.g. theft of a briefcase or burglary at home;
* accidental loss e.g. mislaying papers, laptops and other physical devices on the journey to and from home;
* inadvertent disclosure through e.g. working whilst travelling on a train/bus/plane.

In addition, unless you work directly from/to a University server via a virtual private network, electronic information is vulnerable to loss, unauthorised access or amendment through:

* loss or damage to the PC or storage medium on which the record is held;
* accidental access by household members if records are stored on a home PC or other storage medium without adequate protection;
* remote access by e.g. someone hacking into their system whilst a PC is switched on and/or connected to the internet.

Potential consequences of any of the above could include damage:-

* to their and/or colleagues’, co-authors or fellow grant applicants’ research;
* to their or the University’s reputation;
* to collaborative partnerships/relationships caused by inappropriate release of information;
* which could lead to enforcement orders or fines being imposed under DPA and FOISA or legal action being taken against you or the University.

**Assessing the risks**

Use this risk matrix to help you assess the risks:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Risk | High | Medium | Low | Very low |
| How serious would the consequences be for unauthorised access? |  |  |  |  |
| How likely is it that someone could gain access? |  |  |  |  |
| What is the cost of any security measures? |  |  |  |  |

Consider the risks with reference to the types of records you are creating or working on, e.g. if the consequences:

* of unauthorised access were very low, then low cost security measures would be appropriate;
* are high e.g. in the case of sensitive personal or University data, medical information, data which has a strong duty of confidentiality or the disclosure of which may be legally forbidden and the cost of the security measures is also high, then you must consider whether you should be working on that information at home.

Conversely, if information is highly sensitive but the necessary security precautions are simple to apply and low in cost then you may consider it permissible to work on that information at home.

**Mitigating actions by colleagues**

You should:-

* Ensure your home working environment enables you to comply with the security and records management aspects of creating, holding and working on University records; Use the University’s software for encryption of data and emails where appropriate both at home and on any laptops and other physical devices;
* Adhere to all Information Services policies and guidance for working remotely from home
* Not use personal email accounts for University business. If in exceptional~~;~~ circumstances you decide to do so, then ensure that any emails created or received are sent or copied to their University account and then deleted immediately from ~~their~~ your personal account.
* Note that records contained in private email accounts may be disclosable in certain circumstances under Freedom of Information legislation;
* Not dispose of paper records containing personal data in your domestic waste. These records must be brought back to the University and destroyed in accordance with University guidance;
* Ensure that all work files and records have been deleted from your home PC before you sell or otherwise dispose of it. In extreme cases e.g. where highly sensitive data or research records you would want to protect are concerned, then you may need to consider whether the hard drive should be destroyed.

Edinburgh Napier University acknowledges the inclusion of material published by the University of Edinburgh.

**FURTHER INFORMATION**

**Freedom of Information and FOISA requests**

<https://staff.napier.ac.uk/services/governance-compliance/governance/foi/Pages/default.aspx>

**Records Management**

<https://staff.napier.ac.uk/services/governance-compliance/governance/records/Pages/default.aspx>

**Data Protection**

[Security of personal data](https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/CodeofPractice/Pages/SecurityofPersonalData01.aspx)

[Retention of records](https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/CodeofPractice/Pages/RetentionofRecords.aspx) containing personal data.

**Information Services**

Information Security Policies

<http://staff.napier.ac.uk/services/cit/infosecurity/Pages/InformationSecurity.aspx>

Email encryption

<http://staff.napier.ac.uk/services/cit/infosecurity/Pages/EmailEncryption.aspx>

Data encryption

<http://staff.napier.ac.uk/services/cit/infosecurity/Pages/DataEncryption.aspx>

**Document detail:**

|  |  |
| --- | --- |
| Document Name | Home-working policy |
| Author/Owner | The People Team |
| Version Number |  |
| Equality Analysis/Decision |  |
| Approval Date | 1 August 2015 |
| Approved By |  |
| Date Commencement |  |
| Date of Next Review |  |
| Date of Last Review |  |
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| Date Colleague/s employment contract has been updated (if applicable): |  |
| Related University Policy Documents |  |
| Scope |  |
| *For Office Use - Keywords* |  |

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