The following Regulations were approved by the Governing Body of Merton College on 3rd December 2018. Any amendments to the Regulations require the Governing Body’s approval.

All members of the College, all employees of the College, and all departments within the College are required to comply with these Regulations.

These Regulations are to be reviewed annually to ensure any new developments are covered and protected.
1 Purpose

1.1 These Regulations are intended to ensure that Merton College’s security objectives are met in relation to the use of mobile devices such as (but not limited to) smartphones, tablets, and computer laptops.

1.2 Information is critical to the College’s operations and failure to protect information increases the risk of financial and reputational losses and failure to comply with obligations imposed by legislation. The College is committed to protecting information, in all its forms, from loss of confidentiality, integrity and availability.

1.3 Mobile devices represent a significant risk to information security and data security. If the appropriate security applications and procedures are not applied they can be a conduit for unauthorised access to data controlled by the College (“the College’s data”) and IT infrastructure.

2 Scope

2.1 These Regulations are applicable across the College and individually apply to:

2.1.1 all individuals who have access to Merton College information and technologies;

2.1.2 any mobile hardware that is used to access or store College information-resources, whether the device is owned by the College or not.

2.2 The following definitions shall apply to these Regulations:

2.2.1 ‘MUST’, the verb ‘REQUIRE’ in any of its forms, and ‘SHALL’ mean that the item is an absolute requirement.

2.2.2 ‘MUST NOT’ and ‘SHALL NOT’ mean that the item is absolutely prohibited.

2.2.3 ‘SHOULD’ and ‘RECOMMENDED’ mean that there may exist valid reasons in particular circumstances not to comply with a particular item, but the full implications must be understood and carefully weighed before choosing a different course.

2.2.4 ‘SHOULD NOT’ and ‘NOT RECOMMENDED’ mean that there may exist valid reasons in particular circumstances when particular behaviour is acceptable or even useful, but the full implications should be understood and the case carefully weighed before implementing any behaviour described with this label.
3 Mobile Device Security

3.1 Any mobile device that is used to access the College’s data must have the remote-wipe capability of the device turned on to protect against potential loss or theft.

3.2 Any mobile device that is used to access the College’s data must be protected from unauthorised access by for example a PIN of at least 4 digits, a pass-phrase, or the use of biometric security, and be configured to ensure an automatic lock after a period of inactivity.

3.3 Applications installed on any mobile device that is used to access the College’s data must be trustworthy applications from reputable sources.

3.4 Any mobile device that is used to access the College’s data must be configured to receive software updates from the manufacturer and other relevant third-parties, and updates should be installed within one week of being released. Mobile device firmware must be kept up to date using the manufacturer’s website or, for installed software, that of the relevant provider (e.g. Apple in the case of iTunes). Patches must be checked regularly and applied when available.

3.5 A mobile device that has undergone a ‘jailbreak’ procedure must not be used to access the College’s data; i.e., software/firmware which is designed to gain access to any unintended functionality should not be installed. (For the avoidance of doubt, to ‘jailbreak’ a mobile device is to remove the limitations imposed by the manufacturer. This gives access to the operating system, thereby unlocking all its features and enabling the installation of unauthorised software.)

3.6 Devices must not be connected to any host computer which does not have up-to-date anti-virus software and enabled anti-malware protection.

3.7 Mobile devices must not be used to carry special category personal data (as defined by Article 9(1) of the E.U. General Data Protection Regulation 2016/679) for longer than necessary.

3.8 Mobile devices must be encrypted to protect any data that is on the device.

3.9 Any mobile device that is owned by the College should be security-marked and a record of all serial numbers and identifying information must be made.

3.10 Devices must store any user-saved passwords in an encrypted password store.

3.11 A mobile device must not be left unlocked when unattended.

3.12 Mobile devices left in locked vehicles must be kept out of sight.

3.13 The loss or theft of any mobile device must be reported immediately to the Data Protection Officer and the IT team if the device has access to College data. Out of normal working hours it is acceptable
to report the loss or theft to the College Lodge, but an effort must be made to contact the IT staff so that the risk of a data breach can be mitigated.

3.14 Where it is not practicable to comply with any of the requirements set out above, exceptions shall be documented to justify the deviation and appropriate compensating controls should be put in place on the advice of the IT Department.

4 Responsibilities

The following bodies and individuals have specific information security responsibilities as provided in the College's Information Security Policy:

- The Finance Bursar is accountable to the Governing Body for management of the information security risks to the College's Fellows, employees, Junior Members and other members.
- The Finance Committee has responsibility for overseeing the management of the information security risks to the College's Fellows, employees, Junior Members and other members.
- The Domestic Bursar is responsible for establishing and maintaining such arrangements as may be necessary to ensure the availability, integrity and confidentiality of the College's information.
- The Head of IT is responsible for the implementation of information security arrangements for the computer and digital information systems operated internally by the College. The Head of IT is responsible for the provision of expert technical advice in relation to computer and digital information security arrangements with any third party partners or suppliers.
- Users are responsible for making informed decisions to protect the information that they process.

5 Compliance

The College regards any breach of data privacy legislation, of these Regulations or of any other policies or regulations introduced by the College from time to time to comply with data privacy legislation as a serious matter which may result in disciplinary action.

6 Review and Development

These Regulations shall be reviewed and updated annually by the Finance Bursar and the Data Protection Officer to take account of guidance from the Information Commissioner’s Office and national
legislation and shall be approved by the Governing Body after review by the Finance Committee and the Statutes and Bylaws Committee.

7 Related policies and regulations

These Regulations should be read in conjunction with related policies and regulations, including the:

- Data Protection Policy;
- Information Security Policy;
- Network Acceptable Use Regulations; and
- Data Protection Breach Regulations.