

Report Control Information

Title	Web Content Removal Policy
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Version	V0.3 DRAFT
Reference	ICT/WEB/CR1.0/v1
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Web Content Removal Policy

Web Aspect	Content Management
Web Systems Covered	CMS (Extranet, Intranet), Portal, Research Repository, E-Theses Repository, Blackboard, Blackboard Content Management System, CPanel, & UEA hosted 3rd party websites
Objective	To ensure that the University has a consistent, robust, & efficient means of removing content from web-based applications so as to ensure legal compliance
Responsibility	<p>University policy commits ITCS to the removal of web-based content adjudged to be contrary to University policy or in contravention of our legal obligations.</p> <p>It is the responsibility of Heads of Schools, Directors of Faculty Administration (DFAs), Faculty IT Support Managers and IT service heads to ensure that staff for whom they are responsible are aware of their obligations in regards the content of material placed on the web. Similarly, Course Directors are responsible for making students aware of their obligations.</p> <p>It is the responsibility of all members of the University to report content which they believe to be in contravention of the University's Conditions of Computer Use, or our legal obligations in regards copyright, defamation or other statutory enactments</p>
Incident Management	<p>Incidents of inappropriate content should be reported and handled according to the procedures documented here. Logs of actions taken, including times and dates should be kept. These logs will be reviewed at regular intervals by Web Team staff to identify any patterns or areas of concern.</p> <p>Where UEA policies or IT security mechanisms are discovered to have been seriously breached, they should be handled in accordance with UEA policies governing such breaches..</p>
Audit & Accountability	<p>The Information Policy & Compliance Manager is responsible for drafting this policy & should annually review this policy, consulting with involved parties regarding any proposed changes.</p> <p>The Head of Web Team is responsible for the implementation & communication of activities under this policy. He/She should</p>

	<p>keep records of any investigations and subsequent actions.</p> <p>The Director of Information Services has the responsibility for the final decision regarding permanent removal of material from the web.</p> <p>ISSC is responsible for the approval & quality control of this policy.</p> <p>Faculty IT Support Managers and IT service managers are responsible for ensuring that web content is in compliance with policy, regulatory, and legal obligations & guidelines. Where a takedown has occurred, they should take such remedial action as is indicated or necessary to lessen the risk of a similar occurrence in future.</p>
Implementation	<p>There are 5 stages in any takedown process as follows: Recognition, Preliminary Assessment, Communication, Removal, & Review</p> <p>Recognition</p> <p>It is the policy of the University to not actively review centrally pages created by staff and/or students. It is expected, however, that web content will be placed on the web in compliance with policy, regulatory, and legal obligations & guidelines.</p> <p>Where any member of the University community, or outsider, identifies material that is felt to be outside such guidelines, they can/should communicate via the appropriate link on any webpage or by email to webmaster@uea.ac.uk</p> <p>A précis of this policy shall be placed within the 'Legal Statements' section of the UEA website to provide further guidance to users.</p> <p>Preliminary Assessment</p> <p>Upon receipt of a complaint, the Head of Web Team, in consultation with the Information Policy & Compliance Manager, will undertake a preliminary assessment of the complaint/report. This assessment, based on approved guidelines, is meant to weed out frivolous and/or vexatious requests, and to ensure that a factual basis for takedown and further review exists. Results of the preliminary assessment will be acted upon and reported as stated elsewhere in this policy.</p> <p>This assessment must be conducted quickly, and it is policy that the assessment must be finalised within 48 hours of the initial report. This timeframe will guarantee a response within any and all time limits required by statute.</p> <p>Communication</p> <p>Once any complaint is received, an immediate referral is to be made to the Web Team for action. Upon conclusion of the preliminary assessment, and where action is deemed appropriate, the Web Team will communicate with the UEA staff responsible for the effected web page and with the originator of the content. The results of the preliminary assessment will be communicated, regardless of outcome, to the Director of Information Services.</p> <p>Where information to be taken down is personal (as defined by the Data Protection Act 1998), the Web Team will contact the</p>

	<p>subject of that personal information informing them of the action and the reason for the action. At all times, Data Protection principles will be complied with in regards to the release of any personal data.</p> <p>Removal</p> <p>It is the policy of the University to remove any content that is deemed, upon preliminary assessment, of being outside policy or legal guidelines as soon as possible. The risk to the University's reputation and legal position whilst waiting for an assessment of the nature of the information outweighs the legitimate need to protect the freedom of expression of the person responsible for the content. The content will not be destroyed nor disposed of at this stage, simply removed from public view. This will be undertaken by the Web Team under direction of the Head of Web Team. Where material is to be restored to the web, or removed permanently after review, this information will be communicated by the Head of Web Team to the relevant Faculty or Unit staff.</p> <p>Review</p> <p>The Head of Web Team, upon notification of removal of web content, will conduct a further, more detailed, review of the material in question to assess the issues involved and to provide recommendations as to final resolution. As required, the Head will consult with the ICT Security Manager, the Information Policy & Compliance Manager, and relevant Unit or Faculty staff. The Head may also consult with other staff as is appropriate. A report will be prepared for submission to the Director of Information Services. The final decision regarding permanent removal of material from the web rests with the Director of Information Services. Should any disciplinary actions be indicated, the Head of Web Team will so advise HRD & the CIS Manager.</p>