



Guidance Document

Guidelines on Cloud Services

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Version: 1.6

Description & Target Audience: This document outlines the use of Cloud Services for storing data and the potential implications.

Effective Date:	24th Apr 2018	Status:	Active
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Policy Owner:

Name/Position	Paul Smallcombe, Records & Information Compliance Manager
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Revision History

Version	Description	Author	Date
0.1	Initial draft	Paul Smallcombe	01/07/15
1.0	Draft Finalised	Paul Smallcombe	01/08/15
1.1	Replaced Wuala with Tresorit	Shelim Miah	01/09/15
1.2	Draft finalised	Paul Smallcombe	01/09/15
1.3	Template changed	Shelim Miah	13/09/16
1.4	Finalised	Shelim Miah	28/09/16
1.5		Paul Smallcombe	30/03/2017
1.6	Updates to data protection references	Paul Smallcombe	24/04/2018

Authorisation:

Name / Position	Paul Smallcombe, Records & Information Compliance Manager
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Signature	Paul Smallcombe
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Date	24/04/18
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Guidelines on use of software and general computing resources provided by third parties (cloud services)

This advice relates to the use of software or file space being offered by third parties. This is usually free or at very reduced cost but creates other concerns that should be considered. This advice will consider first the position of the user, then that of the department that may wish to utilise such products and provide them on to their users. Such an online service provider should be chosen by relevance to the nature of the information to be stored. These guidelines are meant to refer primarily to individual sign-ups (rather than as QM) and/or use of a personal (non-QM) account.

The jargon used to describe such offerings includes "cloud computing", "software-as-a-service (SaaS)" - examples are Google Drive and Apps, Apple iCloud, Microsoft OneDrive, Amazon Web Services, Dropbox. It can also include providers of survey tools, such as Survey Monkey, and mail distribution websites, such as Mailchimp, if you sign up to these through the provider's website.

For the user who wants to take advantage of, possibly free, resources:

- 1) These resources - software or file space - often reside on machines/disks that exist wherever is convenient for the service provider. This can change, often frequently, and data may be passed on to or through sub-contractors. More often than not, this is in the USA but the geographic location will likely not even be stated.

QM has various obligations with regard to personal data covered by data protection legislation as outlined in the Data Protection Policy. Specifically, there are responsibilities for security and the restriction of that data to within the European Economic Area (or a small number of other specified countries, not including the USA). As QM does not have a contract with these providers, using these services for transfer or storage of personal data is a breach of data protection legislation

- 2) You must be aware that these facilities usually come with little or no guarantee of availability - you should never use them as your only source of material - e.g. you should not keep your only copy of an important document on a third party disk or use third party software as your only means to get something done.
- 3) Your data may be encrypted in transit, but you need to consider its storage. Where is it held? Is it encrypted? Who owns it? Can foreign law enforcement agencies gain access to it?

REMINDER: you should not use any web-based email, such as GMail or Hotmail, for conducting QM business. You should not use personal cloud accounts to store QM information.

For departments considering use of such resources, obviously the points above need consideration, but also:

- 4) Companies do get into trouble and there have been instances of companies failing and giving users little or no warning to rescue their own data.
- 5) Even though locally provided QM services can suffer issues, QM services are supported and QM takes all due care and consideration with regards to business continuity to mitigate and deal with problems. Data on QM machines is appropriately registered with respect to data protection legislation.

More compliant alternatives

Your first choice should always be to see if QM offers a service you require and use that. In order to ensure that data remains within the EEA and is more secure, there are a number of alternative suppliers which do the same thing as those which are based abroad or use facilities there.

- QM's own [Collect](#) service can be used for transferring large or sensitive files
- Surveys: QM has an account with Online Surveys (formerly BOS), see <http://www.elearning.capd.qmul.ac.uk/learning-applications/other-qmul-learning-applications/online-survey/>
- Cloud storage, backup and sync: [Tresorit](#), holds information in Europe
- Mailing: [Dotmailer](#) stores all information on U.K. servers

Relevant links:

[QMUL Data Protection Policy](#)

[QMUL Cloud Legal Project](#)