



www.npwj.org

# NON C'É PACE SENZA GIUSTIZIA NO PEACE WITHOUT JUSTICE

Via di Torre Argentina 76; I-00186 Roma; Tel. +39 06 68979377 Fax +39 06 68979285  
866 UN Plaza #408; New York NY 10017; Tel. +1 212 9802558 Fax +1 212 9801072  
Rue du Pepin 54 ; B-1000 Bruxelles ; Tel. +32 (0)2 5483910 Fax +32 (0)2 5118100

## NPWJ DATA HANDLING AND SECURITY POLICY

### Table of Contents

General provisions .....	2
Internet and email usage .....	2
Computer programs – digital security and safety.....	4
NPWJ Server and files.....	4
Email lists.....	5
Email protocols.....	5
<b>Annex I: Procedure for known or suspected violations of applicable law and/or NPWJ policies .....</b>	<b>7</b>
<b>Annex II: Explanatory Note .....</b>	<b>9</b>



www.radicalparty.org

No Peace Without Justice is an international non-profit organisation born of a campaign of the Transnational Radical Party and is a constituent association of the Nonviolent Radical Party Transnational and Transparty, an NGO with General (Category I) Consultative Status at the United Nations ECOSOC.

Non C'è Pace Senza Giustizia è un'organizzazione internazionale senza scopo di lucro nata nel 1993 da una campagna del Partito Radicale Transnazionale ed è associazione costituente del Partito Radicale Nonviolento Transnazionale e Transpartito, ONG con Status Consultivo Generale di prima categoria presso l'ECOSOC delle Nazioni Unite.



## N O P E A C E W I T H O U T J U S T I C E

### **General provisions**

1. When carrying out NPWJ work, all employees involved in any capacity are obliged to comply with the laws and regulations in force in Italy and in all countries in which NPWJ operates. In addition, they are required to comply with this Data Handling and Security Policy and other internal regulations and circulars.
2. The pursuit of NPWJ's interests cannot justify, in any event, conduct that does not respect the applicable laws.
3. This Policy concerns data handling and security and covers your use of NPWJ computers, files, email systems and software. It also covers the use of the Internet and computer networks available in NPWJ's offices, including when these are accessed using personal or third party computers.

### **Internet and email usage**

4. We seek a workplace that is free of harassment, sensitive to the diversity of our counterparts and staff and true to the principles underpinning our work. Therefore, staff members, consultants, interns and volunteers are not allowed to use computers and email in ways that are disruptive, offensive to others, or harmful to the dignity or morale of the organisation.
5. At NPWJ you may not use computers and email for ethnic slurs, racial comments, or anything that another person might take as harassment or disrespect of any kind. You also may not display, download, or email pornographic or otherwise offensive or degrading images or messages, unless those are expressly part of your work. If you are unsure about what is expressly part of your work, ask your supervisor for further guidance and clarification.
6. NPWJ will provide an @npwj.org email address, which consists of the initial of your first name and your surname. You are expected to use the NPWJ email address for all emails related to your work, including the NPWJ address of other staff, interns, consultants or volunteers. The use of personal accounts for work purposes other than the @npwj.org address should be limited to exceptional cases (e.g. malfunction of the npwj.org server).
7. You need to set your own password – it should be at least 14 characters long and a mix of letters, numbers and symbols. Do not share your password with anyone. These two points are important for the security of your email and of our entire network.
8. This email address belongs to NPWJ, not to you, and all emails and attachments sent through the @npwj.org email system belong to NPWJ. NPWJ may be accountable for your actions through NPWJ emails and servers.
9. The emails are a working tool and npwj.org accounts are personal but not private. Therefore, NPWJ is authorised to check the contents of any @npwj account, respecting the general principles of necessity, fairness, pertinence and proportionality. In the case of known or suspected violations of applicable law and/or NPWJ policies, we may monitor internet or email usage and may require access to personal email accounts that have been used through NPWJ-



## N O P E A C E W I T H O U T J U S T I C E

provided networks or for NPWJ work. The applicable procedure and other relevant information are contained in Annex I.

10. Everyone must respect the obligation of confidentiality. Information you acquire as part of NPSG/NPWJ, irrespective of whether it is received or sent through email, is covered by the NPWJ confidentiality policy. This means that NPSG/NPWJ staff, interns, consultants and volunteers undertake to treat all information they acquire during their work as confidential. NPSG/NPWJ staff, interns, consultants and volunteers are not at liberty to divulge or discuss such information with anybody outside NPSG/NPWJ, except as necessary for the fulfilment of their work or with the express permission of NPSG/NPWJ, which should be sought in writing from your supervisor, the Secretary-General or Treasurer. Where such permission is granted, you must acknowledge the role of NPSG/NPWJ in any publication. If you are unsure about what is considered necessary for the fulfilment of your work, ask your supervisor for further guidance and clarification.

11. During your work, you will have access to the internet through NPWJ networks or other networks provided to you because of your work with NPWJ, for example in field missions. This policy explains our guidelines for using the Internet. All Internet data that is written, sent, or received electronically, related to NPWJ's activities, is part of official NPWJ records. That means that we can be legally accountable for content and we may be required to show that information to law enforcement or other parties. Therefore, you should always make sure that the business information contained in Internet email messages and other transmissions is accurate, appropriate, ethical and legal. This policy applies whenever you are undertaking NPWJ work or using NPWJ-provided networks, also in the event that you are using private property or the property of a third party.

12. Examples of unacceptable use include, but are not limited to:

- a) Sending or posting discriminatory, harassing, or threatening messages or images on the Internet or via NPWJ's email service.
- b) Using computers to perpetrate any form of fraud, and/or software, film, music or other piracy or copyright infringement.
- c) Stealing, using, or disclosing someone else's password without authorisation.
- d) Sharing confidential material, trade secrets, or proprietary information outside of the organisation.
- e) Hacking into unauthorised websites.
- f) Sending or posting information that is defamatory to the company, its products/services, colleagues and/or partners/donors.
- g) Introducing malicious software onto the company network and/or jeopardising the security of the organisation's electronic communications systems.
- h) Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities.



## N O P E A C E W I T H O U T J U S T I C E

- i) Passing off personal views that contradict NPWJ's policies and priorities as representing those of the organisation.

13. If you are unsure about what constitutes acceptable Internet usage, ask your supervisor for further guidance and clarification.

### **Computer programs – digital security and safety**

14. At NPWJ, you are connected to a network that allows you access to the internet and to the NPWJ server, whether you are using a NPWJ computer or your own. In order to protect the network from viruses and spyware, you agree to use at a minimum Antivir and Spybot. You are also required to update these programs on a regular basis. NPWJ will provide you with the software if you have any difficulties locating it. Please remember: *do not* install more than one spyware or anti-virus program, as this may cause the program(s) to malfunction. This is of critical importance not just for you, but for the entire network, including the NPWJ server.

15. An exception for the use of these antivirus is the Rome office, where you need to install those suggested by the manager of the local network.

16. Update the programs and run a scan at least once per week. If you find a virus, unplug the network cable of your computer (or switch off the wi-fi) and immediately notify the person responsible for your operating office so she or he can help determine what action will need to be undertaken by the rest of the office. If you find spyware, you can simply “fix” the problem using the regular spybot function.

17. NPWJ highly recommends that you also install “Ccleaner” and run it at the end of the day to delete unnecessary files from your computer, particularly from your internet browser cache and “temporary” files. You can download Ccleaner from <https://www.piriform.com> and NPWJ will provide you with the software if you have any difficulties locating it.

18. NPWJ also recommends you use Mozilla Firefox and install the following add-ons: “No Script”, which you can access through the Firefox add-on menu; and “https everywhere”, which you can acquire through the Electronic Frontier Foundation ([www.eff.org](http://www.eff.org)). NPWJ can provide you with assistance in doing this if required.

### **NPWJ Server and files**

19. NPWJ stores its files on the NPWJ server in Brussels, which is called “The Tardis”. You are expected to familiarise yourself with the folder structure on The Tardis and store all work files in the appropriate place. Please ask your supervisor if you have difficulties identifying where that should be. (The files in Rome are stored in the server of the PR, PRNAS-NPWJ).



## N O P E A C E W I T H O U T J U S T I C E

20. Your filenames should clearly reflect the contents of the file and should include a date and version number, where applicable:

NPWJWeeklyMtgRpt08AUG11.doc

NPWJConceptNoteCompletionStrategy2011\_rev1.doc

21. Please do not put spaces or symbols in the filename, as this can cause problems for transfers and downloads.

### **Email lists**

22. NPWJ has a number of email lists, including “staff@npwj.org”, which are designed to make it easy to distribute information to a wide range of people. If you are a user of a mailing list, you will generally be able to post to it (i.e. send an email), reaching automatically all the inscribed users. As user of that mailing list you will receive all the emails sent to it, which will display the name of the list in the object, contained in squared parenthesis (e.g. [staff]).

23. There are “permanent” mailing lists, which are basically used for internal communications, reports, etc. For example, for the weekly staff meeting report, the correct list to be used is the “staff@” list, while for events happening in Brussels, even when they are not strictly related to NPWJ work, you should use the “bru@” list.

24. In addition, there are specific project-related mailing list, created in the light of a forthcoming event and which are eventually deleted after the event (conference, mission, etc.). Sending information through these mailing lists has the advantage of sharing information easily and consistently within a team without the risk of missing someone. In order to facilitate their use please see the following non-exhaustive examples:

- staff@: staff meeting reports, pre- or post-mission reports, official internal communications
- digest@: news which should be included in our digest
- bru@: Brussels-office related information and city-related issues, including not involving directly NPWJ

25. Please note that when you reply to a message sent to a mailing list, your reply may go to the whole mailing list, not only to the original sender. If you want to write to the sender, you can “forward” the email to them.

### **Email protocols**

26. Everyone at NPWJ receives and sends many, many emails per day. In general, it is wise to reply to emails within 24 hours. If this is not possible, it’s a good idea to send an acknowledgment to the sender, including for internal emails. This helps everyone keep track of where things are and lets people know whether their emails were received or not.



## N O P E A C E W I T H O U T J U S T I C E

27. When replying substantively to an email, make sure that you have answered all the points raised in the email, even if it is to say you need to get back to the sender (then remember to get back to them). Before sending, particularly for complicated emails, put them aside for a few minutes, then re-read from the perspective of the person receiving the email to make sure things are clear and courteous. If in doubt, ask someone else to take a look. Always run the spell check through emails before sending.



## N O P E A C E W I T H O U T J U S T I C E

### **Annex I: Procedure for known or suspected violations of applicable law and/or NPWJ policies**

Pursuant to paragraph 9 of this Policy, this Annex sets out the procedure in the case of known or suspected violations of applicable law and/or NPWJ policies.

1. The Secretary-General or Treasurer will determine whether there are reasonable grounds to believe that the applicable law or this Policy have been violated; whether there is a need for steps additional to those contained in this Policy to ensure the security of NPWJ's information system (e.g. virus checking); or whether the criteria in article 7 of Directive 95/46/EC are satisfied.<sup>1</sup>
2. When a positive determination is made pursuant to paragraph 1, the Secretary-General or Treasurer will determine whether there is a need for individual monitoring or access to the email of staff member, intern, consultant or volunteer.
3. The Secretary-General or Treasurer or his or her designated representative will provide written notification to the relevant staff member, intern, consultant or volunteer, containing the following information:
  - a) the determination referred to in paragraph 1 of this annex and the factual basis for such determination;
  - b) the determination referred to in paragraph 2 of this annex and the reasons for such determination;
  - c) the NPWJ staff member responsible for following the issue. Usually this will be the Secretary-General or Treasurer, except where there may be a conflict of interest or some other reason for a different staff member to handle the dossier;
  - d) a request for input from the staff member, intern, consultant or volunteer regarding the situation, including any objections to the designation of the NPWJ staff member referred to in sub-paragraph (c);
  - e) the right of the staff member, intern, consultant or volunteer to request a hearing within 7 calendar days of receipt of the notification; and
  - f) any other relevant information.
4. If the staff member, intern, consultant or volunteer requests a hearing pursuant to sub-paragraph 3(e) of this annex, the hearing will be convened by the Secretary-General or Treasurer, or his or her designated representative, within 7 calendar days of receipt of the request.

---

<sup>1</sup> For example, monitoring or access is necessary for compliance with a legal obligation to which NPWJ is subject (article 7(c)); or monitoring or access is necessary for the legitimate interests of NPWJ, except where such interests are overridden by the interests for fundamental rights or freedoms of the staff member, intern, consultant or volunteer (article 7(f)). Other criteria in article 7 may also be applicable. The Directive is available online at <http://tinyurl.com/ECDirective>.



N O P E A C E W I T H O U T J U S T I C E

5. If, after considering the input of the staff member, intern, consultant or volunteer and/or the results of the hearing, the Secretary-General or Treasurer shall determine whether there is a need to proceed with individual monitoring or access to the email of staff member, intern, consultant or volunteer and how such monitoring or access shall be done.
6. The Secretary-General or Treasurer, or his or her designated representative, shall notify the staff member, intern, consultant or volunteer of the determination referred to in paragraph 5 of this annex within 14 calendar days of receipt of the input referred to in sub-paragraph 3(d) or the hearing referred to in paragraph 4, whichever is later.
7. The staff member, intern, consultant or volunteer has the right to consent to individual monitoring or access to their email, in which case such monitoring or access shall proceed according to the terms of the determination referred to in paragraph 5 of this annex.
8. The staff member, intern, consultant or volunteer has the right not to consent to individual monitoring or access to their email, or to withdraw consent provided pursuant to paragraph 7 of this annex at any time, in which case the Secretary-General or Treasurer, or his or her designated representative, may seek to implement such monitoring or access through legal processes contained in the applicable law, including seeking a court order for such monitoring or access.





## N O P E A C E W I T H O U T J U S T I C E

### **Annex II: Explanatory Note**

#### A. When is the Policy intended to cover the use of which computers?

- The Policy covers instances where NPWJ staff, interns, consultants and volunteers use computers provided by NPWJ, whether in the field or in an NPWJ office.
- The Policy covers instances where NPWJ staff, interns, consultants and volunteers use their own computers through NPWJ-provided networks.
- The Policy does not cover NPWJ staff, interns, consultants and volunteers using their own computers on their own time through a network not provided by NPWJ.

#### B. Why does the Policy cover the use of private computers?

The Policy covers the use of private computers only when they are used for NPWJ work or through NPWJ-provided networks. It is possible that NPWJ would be liable for acts undertaken by NPWJ staff, interns, consultants and volunteers in their working capacity, irrespective of whether they are using private or NPWJ computers. It is for this reason that the Policy extends to the use of private computers when used for NPWJ work or through NPWJ-provided networks and notes that in the event of a breach of applicable law or NPWJ policies, NPWJ may require access to personal email accounts. It only covers access to personal email accounts in the event they are used for NPWJ work.

#### C. Why does the Policy prohibit using computers to perpetrate any form of fraud, and/or software, film, music or other piracy or copyright infringement?

The Policy prohibits this kind of activity using NPWJ computers or NPWJ-provided networks because it is illegal and NPWJ could be liable for the actions of its staff, interns, consultants or volunteers in this respect. However, it only covers this kind of activity done when using NPWJ computers or NPWJ-provided networks, as provided for in the description of the applicability of the Policy. While NPWJ encourages its staff, interns, consultants and volunteers to abide by the law, what people do on their own time using their own property is their own business.

#### D. What does “hacking into unauthorised websites” mean?

In the computer security context, a hacker is someone who seeks and exploits weaknesses in a computer system or computer network. When this is done without authorisation, it could constitute a criminal offence. If it is done using NPWJ computers or NPWJ-provided networks, NPWJ could be liable. Hence, it is prohibited.

#### E. What does “passing off personal views as that of the organisation” mean?

The issue here is that it is not appropriate for NPWJ staff, interns, consultants or volunteers to make representations to third parties regarding the views of the organisation that do not comply with the



## N O P E A C E W I T H O U T J U S T I C E

organisation's policies and priorities. An example would be if someone said that NPWJ supported all aspects of the Iraq Tribunal including its penalties, which included the death penalty. It would not cover situations where interlocutors ask for opinions on which staff – and senior staff in particular – do not have time to consult internally but which follow NPWJ policies and priorities (in which case, if staff are unsure about whether what they say reflects NPWJ policies and priorities, it is wise to note that the issue has not been discussed internally).