



# Pima County Community College District Administrative Procedure

<u>AP Title:</u>	<u>Google Workspace</u>
<u>AP Number:</u>	<u>AP 9.01.12</u>
<u>Adoption Date:</u>	
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<u>Sponsoring Unit/Department:</u>	<u>Information Technology</u>
<u>Policy Title(s) &amp; No(s).:</u>	<u>Information Technology Resource Management, BP 9.01</u>
<u>Legal Reference:</u>	
<u>Cross Reference:</u>	<u>AP 2.15.01 Records and Information Management; AP 9.01.01 Acceptable Use of Information Technology Resources; AP 9.01.08 Information Management Standard Electronic Mail (Email) Handbook Version</u>

## PURPOSE

This Administrative Procedure (“AP”) establishes the standards for use for all applications that compose the College-provided Google Workspace accounts. Community College (PCC / “College”) recognizes that principles of academic freedom, freedom of speech, privacy, and confidentiality hold important implications in communications. This AP addresses these principles within the context of, and subject to, the limitations imposed by the legal and policy obligations of the College.

The purpose of this policy is to ensure that:

1. Google Workspace applications are used by the College community in an ethical and considerate manner in compliance with applicable law and policies, including policies established by the College and its operating units, and with respect for the public trust under which the College operates;
2. Google Workspace users are informed about how concepts of privacy and security apply to all Google Workspace applications, as well as the applicability of relevant policy and law; and
3. Disruptions to College communications and other services and activities are minimized.

## SCOPE

This AP applies to:

1. All Google Workspace services provided, owned, or funded in part or in whole by the College;
2. All users and holders of College Google accounts, regardless of intended use; and
3. All College Official Records and/or Public Records in the possession of, or generated by, College employees and other users of Google services provided by the College, regardless of whether the records were generated on College or non-College computers.

This AP applies equally to transmission and receipt of data, including chats, email headers, summaries, and addresses associated with email records, and any attached files or text.

This AP does not apply to printed copies of electronic records, but other law and policy may apply to such documents. (See AP 2.15.01 Records and Information Management for related definitions and guidelines or contact the College Records & Archives for instructions.)

For the purposes of this policy, the following applications are considered part of Google Workspace:

- Gmail

- [Drive](#)
- [Docs](#)
- [Sheets](#)
- [Slides](#)
- [Calendar](#)
- [Chat](#)
- [Meet](#)
- [Forms](#)
- [Sites](#)
- [Contacts](#)
- [Gemini \(if applicable\)](#)
- [NotebookLM \(if applicable\)](#)

## **SECTION 1: Procedure and Responsibilities**

### **Baseline Requirements:**

#### 1.1 [Specific Use Provisions](#)

- 1.1.1. [Provision of Service: Google Workspace Accounts are provided to all faculty, staff, and students by PCC Information Technology \(IT\) in support of the College’s mission.](#)
- 1.1.2. [College Property: All services associated with the Google Suite of applications are intended for the sole use of College faculty, staff, students, and other appropriately authorized users to accomplish tasks related to and consistent with the mission of the College. College systems and services are College facilities, resources, and property as those terms are used in College policies and applicable law. Any account assigned by the College to individuals, sub-units, or functions of the College is the sole property of the College.](#)
- 1.1.3. [Authorized Service Restrictions](#)
  - 1.1.3.1. [Google Workspace users are required to comply with state and federal laws, College policies, and standards of professional and personal courtesy and conduct. Access to College services is a privilege that may be wholly or partially restricted by the College without prior notice and without the consent of the user: \(a\) when required by and consistent with applicable law](#)

or policy; (b) when there is a reasonable suspicion that violations of policy or law have occurred or may occur; or (c) when required to meet time-dependent, critical operational needs. Such access restrictions are subject to the approval of the appropriate College supervisory or management authority.

- 1.1.3.2. When an individual's affiliation with the College ends, the individual's Google Workspace account will be discontinued. The only exception is for Emeritus faculty.
- 1.1.3.3. The following timelines are provided for the discontinuation of Google services:
  - 1.1.3.3.1. Staff: Immediately upon separation
  - 1.1.3.3.2. Faculty: Immediately upon non-affiliation and after completion of the last grade entry for all former students
  - 1.1.3.3.3. Students: Three semesters after the last semester in which the student was enrolled in a PCC course
  - 1.1.3.3.4. Emeritus: N/A

#### 1.1.4. Authorized Access and Disclosure

- 1.1.4.1. The College may permit the inspection, monitoring, or disclosure of Google Workspace communications, records, or files when:
  - 1.1.4.1.1. required by or consistent with applicable law or policy, such as Arizona Public Records law (A.R.S. section 39-121; the Family Educational Rights and Privacy Act (regarding access to student records); or any appropriately issued subpoena or court order. The Electronic Communications Privacy Act of 1986 also permits messages stored on College systems to be accessed by authorized personnel in certain circumstances;
  - 1.1.4.1.2. there is a reasonable suspicion that violations of a law or College policy have occurred or may occur; or

- 1.1.4.1.3. the College determines that there is a time-sensitive, critical need for operational information that cannot be obtained through other means.
- 1.1.4.1.4. for litigation-related reviews.
- 1.1.4.2. In such instances, the College will, as a courtesy, attempt to inform users prior to any inspection, monitoring, or disclosure of emails, records, and/or files, except when such notification would be detrimental to an investigation of possible violation of law or College policy. Users are required to comply with College requests for access to and copies of records when access or disclosure is required or allowed by applicable law or policy, regardless of whether such records reside on a computer housed or owned by the College. Failure to comply with such requests can lead to disciplinary or other legal action pursuant to applicable law or policy, including but not limited to appropriate College personnel policies or Codes of Conduct.
- 1.1.4.3. All inspection, monitoring, or e-discovery will be conducted by College IT security staff. Data will be provided to the College Office of General Counsel for legal matters and to the business unit supervisor for business matters.
- 1.1.4.4. Matters pertaining to legal authority or necessity will be determined by the College General Counsel or Deputy General Counsel.

## 1.2 Misuse

- 1.2.1. Using Google Workspace resources and services for illegal activities is strictly prohibited. Illegal use may include, but is not limited to: obscenity; child pornography; threats; harassment; theft; attempting unauthorized access to data or attempting to breach any security measures on any electronic communications system; attempting to intercept any electronic communication transmissions without proper authority; and violation of copyright, trademark, or defamation law.
  - 1.2.1.1. For the purpose of this policy, and in accordance with Arizona Revised Statutes and the generally accepted practices of federal

and state courts, the term obscene, or obscenity, shall be evaluated using a three-part test established by Miller v. California. The Miller test for obscenity includes the following criteria:

- 1.2.1.1.1. Whether the average person sees the material as having/encouraging excessive sexual interest based on community standards.
- 1.2.1.1.2. Whether the material depicts or describes sexual conduct in a clearly offensive way as defined by the applicable state law, and
- 1.2.1.1.3. Whether the work, when considered in its entirety, “lacks serious literary, artistic, political, or scientific value.”
- 1.2.2. Failure to follow state law regarding the disposition of records may lead to criminal charges. Refer to AP 2.15.01, Records and Information Management, for additional information.
- 1.2.3. Google Workspace services may not be used for commercial activities not approved by appropriate supervisory personnel consistent with applicable policy; personal financial gain (except as permitted under applicable academic policies); personal use inconsistent with Section 1.3 of this policy; uses that violate other College policies or guidelines; or uses inconsistent with applicable state or federal law. Applicable College policies include, but are not limited to, policies and guidelines regarding personnel, intellectual property, or discrimination and harassment.
- 1.2.4. Except when authorized to do so by title, job responsibility, or authority, and based on the topic, Google Workspace users should not use College resources to give the impression that they are representing, giving opinions, or otherwise making statements on behalf of the College or any unit of the College. Where appropriate, the following explicit disclaimer should be included: "The opinions or statements expressed herein are my own and should not be taken as a position, opinion, or endorsement of Pima Community College." An individual is deemed to be representing the College when communicating in an official capacity within their job responsibilities and functions.

1.2.5. Google Workspace applications shall not be used for purposes that could reasonably be expected to cause, directly or indirectly, strain on any computing facilities or interference with others' use of communications systems. Such uses include, but are not limited to, the use of email services to:

1.2.5.1. Send or forward chain letters.

1.2.5.2. "Spam"; that is, to exploit listservs or similar systems for the widespread distribution of unsolicited mail.

1.2.5.3. "Letter-bomb"; that is, to resend the same email repeatedly to one or more recipients.

### 1.3 Personal Use

1.3.1. Google Workspace services may be used for incidental personal purposes, provided that such use does not:

1.3.1.1. Directly or indirectly interfere with the College's operation of computing facilities or email services.

1.3.1.2. Interfere with the user's employment or other obligations to the College.

1.3.1.3. Violate this policy, or any other applicable policy or law, including but not limited to, use for personal gain, conflict of interest, harassment, defamation, copyright violation, or illegal activities.

1.3.2. Communications, records, and files arising from such personal use shall, however, be subject to access consistent with this policy or applicable law. Accordingly, such use does not carry with it a reasonable expectation of privacy.

1.3.3. Users should exercise caution when registering their College email address with personal use websites (e.g., personal shopping websites, personal social media sites, etc.). College email addresses are largely temporary in nature, active only while maintaining an active college affiliation, and should be treated as such. The College

will not provide access after College affiliation is ended and will not retain email data after applicable retention periods.

1.3.4. Where users cannot avoid using their College email address to register for legitimate third-party accounts, College users are prohibited from using the same credentials for both their College authentication and the third-party authentication (e.g., password reuse).

#### 1.4 Confidentiality

1.4.1. The confidentiality of communications cannot be guaranteed, and any confidentiality may be compromised by access consistent with applicable law or policy, including this policy or by unintended redistribution. Users should not assume that their data is private or confidential.

1.4.2. Users may not access, use, or disclose personal or confidential information without appropriate authorization, and must take necessary precautions to protect the confidentiality of personal or confidential information to which they are entrusted, regardless of whether the information is maintained on paper or is found in any form within Google Workspace or other electronic records.

1.4.3. The Office of the Registrar may elect to publish student email addresses as public directory information, consistent with the Family Educational Rights and Privacy Act (FERPA). Individual students may, consistent with College policy and FERPA, request the College not treat the address as directory information. Requests for identification or release of student email addresses should be directed to the Office of the Registrar.

#### 1.5 Security and Preservation

1.5.1. Google Workspace users must follow sound professional practices in providing for the security of email records, data, applications, programs, and systems under their jurisdiction.

1.5.2. Users are responsible for safeguarding their credentials and for using them only as authorized. Each user is responsible for all communications made under the authorization of their PCC

credentials and for all network activity originating from their PCC User ID. Access to user identifications may not be loaned or sold. In the event an account is compromised, PCC IT will work with the account owner to mitigate the damage and investigate the cause.

- 1.5.3. Each operational unit should establish standards, measures of protection, and any additional backup procedures for its data. Refer to AP 2.15.01 for more information.
- 1.5.4. Operational units should avoid using personal MyDrives (Google Workspace personal drives) to store work-related records or files. Personal MyDrives should be reserved for files relevant to the individual only (e.g., HR or payroll files). Work-related files should be stored in Google Shared Drives.

## 1.6 Violations

- 1.6.1. Suspected or known violations of policy or law should be confidentially reported to the appropriate supervisory level for the operational unit in which the violation occurs, Office of Dispute Resources, Whistleblower Hotline, or Human Resources. Violations will be processed by the appropriate College authorities and/or law enforcement agencies. Violations may result in revocation of Google Workspace service privileges; academic dishonesty or Code of Conduct proceedings; faculty, staff, or student disciplinary action up to and including dismissal; referral to law enforcement agencies; or other legal action.

## 1.7 Sources

- 1.7.1. Family Educational Rights and Privacy Act
- 1.7.2. Arizona Revised Statutes § 39-103. Size of public records; exemptions
- 1.7.3. Arizona Revised Statutes § 39-121. Inspection of public records
- 1.7.4. Arizona State Library, Archives and Public Records General Retention Schedule