

# Email and Internet Policy

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<b>Author</b>	Not Available
<b>Responsible Director</b>	Managing Director
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**Related Policies & Guidelines:**

- Disciplinary Policy
- Confidentiality Policy
- Confidentiality Code of Conduct
- Bullying and Harassment Policy

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## **Amendment History**

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Version	Status	Date	Reason for Change	Authorised
1.0		December 2014	Initial policy for consultation	

## 1. Introduction

This document defines the Email and Internet Policy for Central London Healthcare (CLH). For ease of use, the document is split into three sections – Email Policy and Internet Policy and a Common Definitions Section. Furthermore, there are several appendices attached to the document.

## 2. Email Policy

### 2.1 Introduction

The Email Policy applies to all business functions and information of the email system and relevant people who support the system. This document:

- Sets out CLH's policy for the protection of the confidentiality, integrity and availability of the email system
- Establishes CLH and user responsibilities for the email system
- Provides reference to documentation relevant to this policy

### 2.2 Policy objective and scope

The objective of this policy is to ensure the security of CLH's email system. CLH will:

- **Ensure Availability**  
Ensure that the email system is available for users.
- **Preserve Integrity**  
Protect the email system from unauthorised or accidental modification ensuring the accuracy and completeness of CLH's assets.
- **Preserve Confidentiality**  
Protect assets against unauthorised disclosure.
- **Scope**  
This policy applies to all users of CLH's email service, irrespective of location.

The purpose of this policy is to ensure the proper use of CLH's email system and make users aware of what Central London Healthcare deems as acceptable and unacceptable use of its email system.

### 2.3 Legal risks

The Freedom of Information Act 2000 will enable people to have access to much more information held by public bodies than previously. Communications sent via email may relate to decisions made that might have been sent in letters and memos a few years ago. Like their paper counterparts, these email records must be saved, filed and managed in a manner that will allow easy access in future. Email is a business communication tool and users are obliged to use this tool in a responsible, effective and lawful manner. Although by its nature, email seems to be less formal than other written communication, the same laws apply. Therefore, it is important that users are aware of the legal risks of email:

- If you send emails with any libellous, defamatory, offensive, harassing, racist, obscene or pornographic remarks or depictions, you and Central London Healthcare can be held liable.
- If you forward emails with any libellous, defamatory, offensive, harassing, racist, obscene or pornographic remarks or depictions, you and Central London Healthcare can be held liable.
- If you unlawfully forward confidential information, you and Central London Healthcare can be held liable.
- If you send an attachment that contains a virus, you and Central London Healthcare can be held liable.

By following the guidelines in this policy, the email user can minimise the legal risks involved in the use of email. If any user disregards the rules set out in this Email Policy, the user will be fully liable and may be subject to disciplinary action by Central London Healthcare in accordance with Central London Healthcare's Disciplinary Policy.

## **2.4 Central London Healthcare responsibilities**

Central London Healthcare will ensure that all users have access to training and support for using the email system.

Central London Healthcare will take all reasonable steps to ensure that users of the email service are aware of policies, protocols, procedures and legal obligations relating to the use of email. This will be done through training and staff communications at departmental and Central London Healthcare-wide levels.

## **2.5 Access to the email system**

A new user account will be created by Systems Team at CLH.

## **2.6 Legal requirements**

The following rules are required by law and are to be strictly adhered to:

- It is strictly prohibited to send or forward emails containing libellous, defamatory, offensive, harassing, racist, obscene or pornographic remarks or pictures. If you receive an email of this nature, you must promptly notify your line manager.
- Do not forward a confidential message without acquiring permission from the sender first.
- Do not forge or attempt to forge email messages.
- Do not send email messages using another person's email account.
- Do not breach copyright or licensing laws when composing or forwarding emails and email attachments.

## **2.7 Best practice**

Central London Healthcare considers email as an important means of communication and recognises the importance of proper email content and speedy replies in conveying a professional image and delivering a good service. Therefore Central London Healthcare wishes users to adhere to the following guidelines:

- Write well-structured emails and use short, descriptive sentences.

- CLH's email style is informal. This means that sentences can be short and to the point. You can start your email with 'Hi', or 'Dear', and the name of the person. Messages can be ended with 'Regards'. The use of Internet abbreviations and characters such as "smileys" however, is not encouraged.
- Signatures must include your name, job title, CLH logo, and contact number.
- Use the spell checker before you send out an email.
- Do not send unnecessary attachments. Try sending links to file if internal or have the document placed on the CLH directory (if applicable).
- Do not write emails in capitals. This appears as if you are shouting and is considered rude.
- Do not print emails unless you really need to for work purposes. Emails can be saved, if you need them.
- If you need a reply to your email by a particular date let the recipient know this.
- If you forward emails, state clearly what action you expect the recipient to take.
- Only send emails if the content would be suitable for display on a public notice board. If they cannot be displayed publicly in their current state, consider rephrasing the email, using other means of communication, or protecting information by using a password.
- Only mark emails as important if they really are important.
- Ensure you send your email only to people who need to see it. Sending emails to all in your address book can unnecessarily block the system.
- Emails should be treated like any other correspondence and should be answered as quickly as possible.
- Delete any email messages that you do not need to have a copy of.
- If you suspect you received a virus by email, telephone ICT Service Desk immediately on 0207 350 4050.
- Do not attempt to remove the virus yourself. The Service Desk will need to know what virus it is.

## 2.8 Personal use

Although Central London Healthcare's email system is meant for business use, CLH allows the reasonable use of email for personal use if certain guidelines are adhered to:

- Personal use of email should not interfere with work.
- Personal emails must also adhere to the guidelines in this policy.
- Personal emails are kept in a separate folder, named 'Private'. The emails in this folder must be deleted weekly so as not to clog up the system.
- The forwarding of chain letters, junk mail, jokes and executable programs is strictly forbidden.
- As with work related emails, personal emails may be monitored by Central London Healthcare and remain the property of CLH at all times.

## 2.9 Confidential information

The email transmission of this information internally/externally over Central London Healthcare's network can pose serious risks to confidentiality, and should only be done when

essential to the delivery of healthcare. All transmission of identifiable information should be in line with Central London Healthcare's email policy.

Special care should be taken to ensure the information is sent only to recipients who need to know; always double check that staff are sending the email to the correct person(s).

External transfers should only take place to persons with access to NHS.net. Under no circumstances whatsoever should any type of patient identifiable information or sensitive or confidential information about any other person be e-mailed to persons who only have non NHS.net email addresses. Due to its insecure nature, any information transmitted over the Internet should be considered to be in the public domain.

## **2.10 Disclaimer**

All Central London Healthcare emails should contain the following disclaimer:

The CLH e-mail service may only be used for the communication of NHS information in accordance with NHS Information Governance Codes of Practice.

*This email is intended only for the use of the above named person or service. It may contain information that is privileged or confidential. If you are not the intended recipient, any dissemination, disclosure, or copying of this communication is prohibited. If you have received this in error, please notify the department as mentioned above immediately and delete the e-mail or destroy the fax either by shredding or incineration.*

## **2.11 System monitoring**

All emails are monitored for viruses. All email traffic (incoming and outgoing) is logged automatically. The logs may include email content. These logs are audited periodically.

The content of emails is routinely monitored. Furthermore, Central London Healthcare reserves the right to retain message content as required to meet legal and statutory obligations, and to release any information to law enforcement officers as required by the Regulation of Investigatory Powers Act (RIPA) or any other legal or contractual requirements.

All email is traceable and could be held as part of the record in an investigation or allegation.

If there is evidence that you are not adhering to the guidelines set out in this policy, CLH reserves the right to take disciplinary action, which may lead to a termination of contract and/or legal action.

# **3. Internet Security**

## **3.1 Introduction**

### **Rationale**

In common with other NHS organisations, Central London Healthcare provides access to the Internet through its connection to the NHS.net. The NHS.net is a virtual private network that

operates throughout the NHS and is inaccessible to non-NHS organisations. It provides access to both NHS-specific websites (prefixed nww.) and the world-wide web (www.). This policy sets rules and provides guidance for the use of Central London Healthcare internet facility.

### **Scope**

The policy applies to all full-time and part-time employees of CLH, non-executive directors, contracted third parties (including agency staff), students/trainees, staff on secondment and other staff on placement with CLH, and staff of partner organisations with approved access, irrespective of geographic location.

### **Principles**

The Internet is a fast and effective electronic means of communicating and gathering information that can enhance the efficiency and effectiveness of staff at CLH.

The facilities exist primarily for the purpose of conducting Central London Clinical Commissioning Group business but can also be used for permitted personal purposes.

The internet is source of information and knowledge of infinite range but offers no guarantee of accuracy, reliability and authenticity.

The internet and NHS.net are now the primary means of communicating policy by the NHS Executive within the NHS organisation.

CLH will use these facilities to the full (but within available resources and technology) in communicating and cascading information throughout the organisation. Staff are encouraged to familiarise themselves with the facilities and to make use of CLH's own internet site.

The internet facility employs complex technology which is not 100% reliable and staff should not rely wholly and solely on them for critical business processes.

## **3.2 Core principles**

- Staff will have access to the intranet and the internet in accordance with national targets.
- Personal use of the facilities will be limited and within prescribed areas.
- Safeguards will be established to protect the security, integrity and availability of Central London Healthcare's systems.
- The requirements of relevant Acts of Parliament and mandatory national policies will be observed at all times.
- Staff awareness of copyright and contractual issues will be raised.
- Guidance on housekeeping to ensure efficiency in the operation of the network will be observed.

### **3.3 Internet access**

Central London Healthcare reserves the right to block access to any internet sites that it considers inappropriate, disruptive to staff or a threat to Central London Healthcare's core network traffic.

Any staff member that wishes to have a block site reviewed may do so by emailing the Service Desk, who will escalate according to the urgency of the request. The ICT Steering Group will act as the final judicators in any dispute.

#### **Personal use**

Limited personal use of Internet facilities is permitted provided that the material accessed is appropriate is not potentially offensive to others. The use of the Internet for personal transactions only, such as booking reservations or tickets or the purchase of any goods or services for personal use, is permitted. Employees should regard this facility as a privilege that should normally be exercised in their own time without detriment to the job and not abused. Inappropriate or excessive use may result in disciplinary action and/or removal of facilities. Staff should be aware that Internet access will be subject to monitoring.

#### **Inappropriate use**

Access to websites that contain inappropriate material is strictly forbidden, e.g. pornography, instruction on criminal or terrorist skills, promotion of cults, gambling, content or statements of a nature which are liable to cause offence to others, or any other material likely to bring Central London Healthcare into disrepute. Employees should operate the 'Back' button immediately should they inadvertently access unsuitable material. Downloading of such material shall be deemed an act of gross misconduct. However, CLH notes that access to subjects and sites of a potentially contentious nature may be appropriate in some areas of normal operation and/or in specific Circumstances, e.g. sex education, youth advice, counselling on gambling, approved research, etc. CLH therefore places special responsibilities of care on staff operating in such areas to ensure that such access is necessary and that other users, staff and members of the community are not exposed to any such material without good cause.

Staff should not use the Internet to conduct personal transactions in pursuit of their own commercial or business interests nor in such a way as to implicate CLH in those transactions. If in doubt, staff should consult their Line Manager.

#### **Copyright**

Files must not be downloaded from the Internet and used in such a way as to violate copyright laws. Even if downloading is permissible under copyright law, there may be restrictions with regard to copying, forwarding, or otherwise distributing files. Software license agreements should be read and adhered to. Staff must not transmit copyright software from their computer via the Internet.



### **Viruses**

Viruses can damage computer systems, destroy data, cause disruption and incur considerable expense for Central London Healthcare. Employees connected to the network must ensure that they have an appropriate virus scanner on their PC and that this is regularly updated (the ICT Service Desk will advise). All files downloaded from the Internet must be virus checked before use. Employees must not independently load software onto their PCs (this includes screensavers). All software installations required must be arranged with the Service Desk, but be warned, this ICT department have to be very strict with downloads due to viruses and unknown impact of 3rd party software on Central London Healthcare network.

### **Internet Service Providers**

Internet access must be arranged via the ICT Service Desk in all instances. Individuals must not independently arrange Internet access direct with a commercial Internet Service Provider.

## **3.4 Implementation and compliance**

### **Responsibilities of all Staff**

All staff are obliged to adhere to this policy. It is the responsibility of the individual to ensure that they understand this policy.

Managers at all levels are responsible for ensuring that the staff for whom they are responsible are aware of and adhere to this Policy. They are also responsible for ensuring staff are updated in regard to any changes in this Policy. Managers will require staff to sign a statement to say that they have access to and have read this Policy.

### **Training**

Central London Healthcare will work with INWL to ensure that training on the use of the email and internet facility is available to staff who require it.

## **4. Definitions**

### **4.1 Defamation and libel**

#### **What is defamation & libel?**

A published (spoken or written) statement or series of statements that affects the reputation of a person (a person can be a human being or an organisation) and exposes them to hatred, contempt, ridicule, being shunned or avoided, discredited in their trade, business, office or profession, or pecuniary loss. If the statement is not true then it is considered slanderous or libellous and the person towards whom it is made has redress in law.

#### **What you must not do**

Make statements about people or organisations in any email that you write without verifying their basis in fact. Note that forwarding an email with a libellous or defamatory statement also makes you liable. Furthermore, uploading any information to public or private websites,

or the Intranet (e.g. to forums, “blogs”, etc) which is of a libellous or defamatory nature could lead to disciplinary or legal action.

#### **What are the consequences of not following this policy?**

You and Central London Healthcare may be subject to expensive legal action and may lead to disciplinary action in accordance with CLH’s Disciplinary Policy.

## **4.2 Harassment**

### **What is harassment?**

Harassment may be defined as “any conduct based on age, sex, sexual orientation, gender reassignment, disability, HIV status, race, colour, religion, political, trade union or other opinion or belief, national or social origin, association with a minority, domestic circumstances, property, birth or other status which is unreciprocated or unwanted and which affects the dignity of men and women at work”.

### **What you must not do**

Use Central London Healthcare systems to harass other members of staff by sending or viewing material they consider offensive or threatening.

### **What are the consequences of not following this policy?**

Central London Healthcare deals with harassment by providing advice, support and mediation. Those perpetrating harassment can also be dealt with in the context of CLH’s Bullying and Harassment Policy and could result in disciplinary action up to and including dismissal.

## **4.3 Pornography**

### **What is pornography?**

Pornography can take many forms. For example, textual descriptions still and moving images, cartoons and sound files. Some pornography is illegal in the UK and some is legal. Pornography considered legal in the UK may be illegal elsewhere. Because of the global nature of the internet these issues must be taken into consideration. Therefore, CLH defines pornography as the description or depiction of sexual acts that are designed to be sexually exciting. Central London Healthcare will not tolerate its facilities being used for this type of material and considers such behaviour to constitute a serious disciplinary offence.

### **What you must not do**

- **Send or forward electronically, any medium containing pornography.** If you have received any email containing pornography, please immediately close the email and inform the ICT Service Desk.
- **Save pornographic material that has been transmitted to you by any means.** If you have received any pornographic material, please immediately close the media/file and inform the ICT Service Desk.
- **View websites which contain pornographic material.** If you have accidentally been redirected to such a website, please immediately close the internet browser and inform the ICT Service Desk.

**What are the consequences of not following this policy?**

Users and/or Central London Healthcare can be prosecuted or held liable for viewing or transmitting pornographic material in the UK and elsewhere.

Users found to be in possession of pornographic material, or to have transmitted pornographic material, may be subject to CLH Disciplinary Action.

All staff should be aware that the reputation of CLH will be seriously questioned if pornographic material has been transmitted and this becomes publicly known. Dependant on the type of material concerned, the user and Central London Healthcare can face serious legal action leading to a fine or imprisonment.

#### **4.4 Copyright**

**What is copyright?**

Copyright is a term used to describe the rights under law that people have to protect original work they have created. The original work can be a computer program, document, graphic, film or sound recording, or many other materials.

Copyright protects the work to ensure no one else can copy, alter or use the work without the express permission of the owner. Copyright is sometimes indicated in a piece of work by this symbol ©. However, it does not have to be displayed under British law. So a lack of the symbol does not indicate a lack of copyright. In the case of computer software, users purchase a licence to use the work. Central London Healthcare purchases licences on behalf of its users.

**What you must not do**

- Alter any software programs, graphics etc without the express permission of the owner.
- Claim someone else's work is your own.
- Send copyrighted material by any electronic means without the permission of the owner. This is considered copying.

**What are the consequences of not following this policy?**

The user and/or CLH can face fines and/or up to two years imprisonment as well as being fined for infringing copyright.

## **Appendix 1 – Email Attachments**

### **Introduction**

When files are attached to emails, the attachment is automatically sent with the email. If the email is sent to all staff, that attachment is sent to several hundred email addresses. This can consume a large amount of bandwidth on the network and the attachment will take up space in every person's mailbox. Additionally, those on dial-up connections may be forced to download a potentially large attachment even though it may not be relevant to their needs.

However, if the document is published elsewhere, such as a website, an email can be sent that contains a hyperlink to that document. If the recipient wishes to view the attachment, they can simply click on the link and view the file in their web browser.

The result is that there is only one copy of the file and it is available to everyone. The only space taken up saving the file is for that single copy and only those who wish to view the file need to download it, hence network space and bandwidth is saved.

### **Sending files as emails**

If a file is a Word document and its contents are only relevant for a short time, then its contents should be included within the body of the email rather than being published on the intranet. However if the contents have specific formatting, such as for a poster or flyer, then the file can be published on a website but must be flagged for removal when it is no longer relevant e.g. the event publicised by a poster has passed.

## **Appendix 2 – References**

Freedom of Information Act 2000

<http://www.legislation.gov.uk/ukpga/2000/36/contents>