INTERNET USE POLICY

AUGUST 2019

Important: This document can only be considered valid when viewed on the CCG's website.

If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online.

If you need this document in a different format or language (e.g. large print, Braille, audio or easy read), please contact us on 01482 344700, or email HULLCCG.contactus@nhs.net, or write to: NHS Hull Clinical Commissioning Group, 2nd Floor, Wilberforce Court, Alfred Gelder Street, Hull HU1 1UY.

Name of Policy:	Internet Use Policy
Date Issued:	11 September 2019
Date to be reviewed:	1 August 2021

Policy Title:	Internet Use Policy
Supersedes: (Please List)	Internet Use Policy
Description of Amendment(s):	Updated to include organisational changes and housekeeping elements.
This policy will impact on:	All CCG employed Staff, Board Members and Relevant Others
Policy Area:	IT
Version No:	2
Author:	John Mitchell, Associate Director of IT
Effective Date:	September 2019
Review Date:	1st August 2021
Equality Impact Assessment Date:	August 2019

APPROVAL RECORD		Date:
	Integrated Audit and Governance Committee	September 2019
Consultation:	Senior Leadership Team	August 2019
	Relevant Others	August 2019

CONTENTS

We are, we care.
Every day we are creating a healthier Hull

1. INTRODUCTION

The purpose of this policy is to ensure the appropriate use of NHS Hull Clinical Commissioning Groups (CCG) Internet system and make users aware of what is deemed as an acceptable and unacceptable use of its Internet system. By following the guidelines in this policy, the Internet user can minimise the legal risks involved in the use of Internet.

This document defines the Internet Use Policy for Hull CCG. The Internet use Policy applies to all users of the Internet and the relevant people who support the Internet system. The Internet is a general term that covers access to numerous computers and computer systems worldwide that are accessed electronically.

This document:

- Sets out the Hull CCG's policy for the protection of the confidentiality, integrity and availability of the Internet system.
- Establishes organisational and user responsibilities for the Internet system.
- Provides reference to the documentation relevant to this policy.

2. SCOPE

This procedure applies to all NHS Hull Clinical Commissioning Group (CCG) employees and any other person on Hull CCGs business irrespective of age, race, colour, religion, disability, nationality, ethnic origin, gender, sexual orientation or marital status, domestic circumstances, social and employment status, HIV status, gender reassignment, political affiliation or trade union membership. All employees will be treated in a fair and equitable manner and reasonable adjustments will be made where appropriate (e.g. interpreter or signing provision, access arrangements, induction loop, etc.).

This policy applies to:

- All employees of Hull CCG
- Board members
- Contracted Third Parties (including Agency staff)
- Students and trainees
- Staff on secondment and other staff on placement within Hull Clinical Commissioning Group
- Any other individual on Hull Clinical Commissioning Group business

3. POLICY PURPOSE AND AIMS

The objective of this policy is to ensure the security of the Hull Clinical Commissioning Group (CCG) Internet system. To do this the Hull CCG will aim to:

31. Ensure availability: Ensure that the Internet system is available for users.

3.2 Preserve integrity: Protect the Internet system from unauthorised or accidental modification ensuring the accuracy and completeness of the Hull CCG assets.

3.3 Preserve confidentiality and Protect assets against unauthorised disclosure

Employees should be aware that inappropriate use of the Hull Clinical Commissioning Group (CCG) Internet system whether under this policy or otherwise may lead to disciplinary action being taken against an employee under the Hull CCG disciplinary procedures, which may include summary dismissal.

Any non-employee user as described in point 2 found to be using the Internet inappropriately will have access withdrawn and usage will be investigated which may lead to the individual being asked to leave the Hull CCG. Patient and clinical care are paramount to the Hull Clinical Commissioning Group and must take precedent over all non-business internet traffic, therefore if it is found that non-business use of the internet is having a detrimental impact on clinical care then internet access will be withdrawn were necessary on a site by site basis.

Hull CCG will take all reasonable steps to ensure that users of the Internet service are aware of policies, protocols, procedures and legal obligations relating to the use of Internet. This will be carried out via training and staff communications and Hull CCG team brief sessions. For new starters details of the policy will be included in the pack received at induction.

3,4 The overall responsibilities for Information Governance are as follows and if advice is required the following colleagues can be contacted:

- Line Manager
- Information Governance Team
- Senior Information Risk Owner (SIRO)
- Associate Director of IT

4.   IMPACT ANALYSIS

4.1   **Equality**

The CCG is committed to:

- Eliminating discrimination and promoting equality and diversity in its Policies, Procedures and Guidelines, and
- Designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.
- As a result of performing an equality analysis, the policy does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions are recommended at this stage.

4.2   **Bribery Act 2010**

NHS Hull Clinical Commissioning Group has a responsibility to ensure that all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010.

The Bribery Act 2010 makes it a criminal offence to bribe or be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed. The penalties for any breaches of the Act are potentially severe. There is no upper limit on the level of fines that can be imposed and an individual convicted of an offence can face a prison sentence of up to 10 years.

For further information see http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf.

If you require assistance in determining the implications of the Bribery Act please contact the Local Counter Fraud Specialist on telephone number 01482 866800 or email at nikki.cooper1@nhs.net.

Due consideration has been given to the Bribery Act 2010 in the development of this policy.

5.   NHS CONSTITUTION

5.1   The CCG is committed to: the achievement of the principles, values, rights, pledges and responsibilities detailed in the NHS Constitution, and ensuring they are taken account of in the production of its Policies, Procedures and Guidelines.

5.2   This Policy supports the NHS Constitution.

6.   ROLES / RESPONSIBILITIES / DUTIES

6.1   **ACCESS TO THE INTERNET SYSTEM**

Access to the Hull Clinical Commissioning Group Internet is granted when the employee's line manager requests the user be set up, usually as a new starter or when moving from a different NHS organization. This access comes as part of a package and the user will also receive email and Y drive access. Upon the line manager requesting access for this 'package' it is the line manager's responsibility to ensure the member of staff is aware of the policies that apply to usage.

6.2   **ACCEPTABLE AND UNACCEPTABLE USE OF INTERNET**

Best practice Summary

- Hull Clinical Commissioning Group considers the Internet as an important means of communication and recognises the importance of appropriate Internet content and speedy replies in conveying a professional image and

delivering good customer service.

- Use of the Internet for personal use should be limited to approved break periods (if any) or conducted within your own time.

- Counter Fraud and Security Management Services (CFSMS) may be involved in any investigation that Hull Clinical Commissioning Group instigates and as such if anybody believes that the internet is being used inappropriately in any way they must not use that particular piece of computer equipment at all and seek immediate advice from the Associate Director of IT or Security Manager.

Acceptable Internet Usage

Users must adhere to the following guidelines:

- To access web sites for personal use as long as this does not interfere with work or the network speed and is conducted within approved break periods (if any) or in your own time and does not incur any cost to the CCG.

- To access research material and other information relevant to your work.
- Authorised ordering and procuring of goods for Hull Clinical Commissioning Group business.

Unacceptable Internet Usage

- Creating, downloading or transmitting (other than for appropriately properly authorised and lawful research) any obscene or indecent images, data or other material, or any data capable of being resolved into obscene or indecent images or material.

- Creating, downloading or transmitting (other than for appropriately authorised and lawful research) any defamatory, sexist, racist, offensive or otherwise unlawful images, data or other material.

- Creating, downloading or transmitting material that is designed to annoy, harass, bully, inconvenience or cause needless anxiety to other people.

- Creating or transmitting "junk-mail" or "spam". This means unsolicited commercial web mail, chain letters, jokes or advertisements. If these types of mails are received they should be deleted and not forwarded to other users.

- Using the Internet to conduct private or freelance business for the purpose of commercial gain.

- Creating, downloading or transmitting data or material that is created for the purpose of corrupting or destroying other user's data or hardware.

- Downloading streaming video or audio for entertainment purposes.

- Downloading and/or installing any software from the Internet without obtaining written authorisation from the IT supplier.

- The use of sites that allow users to pick up personal emails (i.e. Hotmail etc) are not permitted and will be blocked via network software due to potential risks imposed on the NHS network.

- The use of some sites have been blocked and others may be blocked on an ongoing basis if deemed necessary by either the Associate Director of IT or under guidance from the IT supplier if they are deemed to be having a detrimental impact on the network usage. Requests for a site to be unblocked for legitimate work purposes must go to the Associate Director of IT.

- Using the Internet for any kind of chat room/social media unless for appropriately authorised and lawful research.

Procuring on the Internet

Hull Clinical Commissioning Group does not accept any liability for staff using the Internet for personal use to order or procure goods for personal use or using internet banking.

Mobile Phones

Employees will be provided a mobile phone with a tariff that has been designed to provide sufficient usage for all working requirements. Employees must avoid using data for personal use, however wifi is acceptable.

Data usage will be monitored on a monthly basis, and excessive personal use will be investigated, with the potential for employees being charged for personal use.

Tethering should only be used when alternative options for connectivity e.g. WiFi are unavailable as it quickly uses up the data allowance, however employees are expected to tether to their mobile phone if required. If an employee feels they may require additional data allowance this should be discussed with their manager.

6.3 **SYSTEM MONITORING**

All Internet traffic is logged automatically (each site a user visits is included in the log, with the time visited and pages viewed) on each piece of computer equipment used within Hull Clinical Commissioning Group. Software is also

used that prevents users visiting sites that may contain illegal and/or pornographic material or would have a known detrimental effect on bandwidth.

6.4 EMPLOYEES RESPONSIBILITIES

To abide by and ensure adherence to Hull Clinical Commissioning Group Policies and not to abuse use of the Internet.

To report any information security breaches via the Hull Clinical Commissioning Group incident reporting system

To complete online mandatory training regarding Information Governance.

To comply with the Hull Clinical Commissioning Group code of conduct for employees in respect of the Data Protection and Confidentiality Policy when using the Internet, this document is available on the Hull Clinical Commissioning Group website.

7. IMPLEMENTATION

The policy will be disseminated by being made available on the website and highlighted to staff through newsletters, team briefings and by managers.

'Breaches of this policy may be investigated and may result in the matter being treated as a disciplinary offence under the CCG's disciplinary procedure'.

8. TRAINING AND AWARENESS

Staff will be made aware of the policy via the website.

9. MONITORING AND EFFECTIVESNESS

The effectiveness of this Policy will be monitored by the Associate Director of IT.

10. POLICY REVIEW

This Policy will be reviewed within two years from the date of implementation.

11. REFERENCES

12. ASSOCIATED DOCUMENTATION
Policies:
Bullying and Harassment Policy
Email Policy
Code of Confidentiality
Security Management Policy
Data Protection and Confidentiality Policy
Computer Equipment away from the workplace

APPENDIX 1

DEFINITIONS

Defamation and libel

What is defamation and libel?

A published (spoken or written) statement or series or 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 on any web pages you are including on the website without verifying their basis in fact.

What are the consequences of not following this policy?

Disciplinary action against the guilty party which could ultimately lead to their dismissal.

Pornography

What is pornography?

Pornography can take many forms, for example written descriptions, still and moving images, cartoons and sound files. Some pornography is illegal in the UK and some is legal. Pornography that is legal in the UK may be considered illegal elsewhere. Due to the global nature of Internet, these issues must be taken into consideration. Therefore, Hull Clinical Commissioning Group defines pornography as the description or depiction of sexual acts or naked people that are designed to be sexually exciting. Hull Clinical Commissioning Group 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

- Create, download or transmit (other than for properly authorised and lawful research) pornography.
- Send or knowingly forward web mails with attachments containing pornography. If you receive a web mail with an attachment containing pornography you should report it to the IT service desk or your Line Manager.

What are the consequences of not following this policy?

- Users and/or Hull Clinical Commissioning Group can be prosecuted or held liable for transmitting or downloading pornographic material, in the UK and elsewhere.
- The reputation of Hull Clinical Commissioning Group will be seriously questioned if its systems have been used to access or transmit pornographic material and this becomes publicly known.
- Users found to be in possession of pornographic material, or to have transmitted pornographic material, will be subject to an investigation which may lead to disciplinary action and ultimately dismissal. Police action may also be taken

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, for example. 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. The organisation 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 as your own
- Send copyrighted material by the Internet without the permission of the owner. This is considered copying.

What are the consequences of not following this policy?

A user and/or Hull Clinical Commissioning Group can face fines and/or up to two years imprisonment for infringing copyright.

HR / Corporate Policy Equality Impact Analysis:	
Policy / Project / Function:	Internet Use Policy
Date of Analysis:	8 March 2019
Completed by: **(Name and Department**)	John Mitchell, Associate Director of IT
What are the aims and intended effects of this policy, project or function?	The CCG has developed this policy to guide staff in working safely and complying with current Data Protection legislation and GDPR and to highlight the definition of appropriate and inappropriate usage.
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	A section has been added around the use of mobile phones within the CCG.
Please list any other policies that are related to or referred to as part of this analysis	Bullying and Harassment Policy Email Policy Code of Confidentiality Security Management Policy Data Protection and Confidentiality Policy Computer Equipment away from the workplace
Who will the policy, project or function affect?	All employees of Hull CCG Board members Contracted Third Parties (including Agency staff) Students and trainees Staff on secondment and other staff on placement within Hull Clinical Commissioning Group Any other individual on Hull Clinical Commissioning Group business

What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	Engagement will take place with the Senior Leadership Team and relevant others.
Promoting Inclusivity and Hull CCG's Equality Objectives. How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation? How does the policy promote our equality objectives: 1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs	This Policy does not directly promote inclusivity, but sets out guidelines to ensure the appropriate use of the NHS Hull Clinical Commissioning Groups (CCG) Internet system and make users aware of what is deemed as an acceptable and unacceptable use of its Internet system.

Equality Data	
Is any Equality Data available relating to the use or implementation of this policy, project or function? Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine *Protected Characteristics* – referred to hereafter as *'Equality Groups'*. Examples of *Equality Data* include: (this list is not definitive)	Yes ☐ No ☑ Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document). If you answered No, what information will you use to assess impact? **Please note that due to the small number of staff employed by the CCG, data with returns small enough to identity individuals cannot**

1: Recruitment data, e.g. applications compared to the population profile, application success rates 2: Complaints by groups who share / represent protected characteristics 4: Grievances or decisions upheld and dismissed by protected characteristic group 5: Insight gained through engagement	**be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.**

Assessing Impact

Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?
(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a *Genuine Determining Reason*[1] exists (see footnote below – seek further advice in this case)
It is anticipated that these guidelines will have a positive impact as they support policy writers to complete meaningful EIAs, by providing this template and a range of potential issues to consider across the protected characteristics below. There may of course be other issues relevant to your policy, not listed below, and some of the issues listed below may not be relevant to your policy.				
Gender	✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Age	✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Race / ethnicity / nationality	√			Hull CCGs current workforce data shows a higher proportion of white British. However, it is recognised that this policy is written in England and there is a risk to any member of staff whose first

---

1.   [1] *The action is proportionate to the legitimate aims of the organisation (please seek further advice)*

					language is not English and support will be offered to ensure the policy is translated to the required language.
Disability		✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Religion or Belief		✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Sexual Orientation		✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Pregnancy and Maternity		✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Transgender / Gender reassignment		✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic
Marriage or civil partnership		✓			The application of this policy is both fair and consistent regardless of the gender and therefore does not impact on this protected characteristic

Action Planning:				
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?				
Identified Risk:	**Recommended Actions:**	**Responsible Lead:**	**Completion Date:**	**Review Date:**
It is recognised that this Policy is written in English and there is therefore a risk to the staff whose first language is not	Support will be offered to those individuals who need it and the policy could be translated if and when needed.	Communications Team	If and when required.	

English for misunderstanding.				