

# COMMUNICATIONS POLICY

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## A) INTRODUCTION

- 1) IT and Communication plays an essential role in the conduct of our business. The IT infrastructure including e-mail and internet access have therefore significantly improved business operations and efficiencies.
- 2) How you communicate with people not only reflects on you as an individual but also on us as a business. As a result of this the company values your ability to communicate with colleagues, clients/customers and business contacts but we must also ensure that such systems and access are managed correctly, not abused in how they are used or what they are used for.
- 3) This policy applies to all members of the Company who use our or our clients' communications facilities, whether Directors/Consultants, full or part-time employees, contract staff or temporary staff. The parameters and restrictions are outlined below and you are required to read them carefully.

## B) GENERAL PRINCIPLES

- 1) You must use our and our clients' information technology and communications facilities sensibly, professionally, lawfully, consistently with your duties and in accordance with this policy and other Company rules and procedures.
- 2) At all times employees must behave with honesty and integrity and respect the rights and privacy of others in relation to electronic communication and information. The company reserves the right to maintain all electronic communication and files.
- 3) Every employee will be given access to the Intranet and/or Internet as appropriate to their job needs. For those who do not have daily PC access occasional access will be arranged, as necessary, by Management,
- 4) All PC/network access will be through passwords, and no individual is permitted onto the system using another employee's password. Employees are not permitted to share their password with anyone inside or outside the company. Individuals will be allowed to set their own passwords, and must change them as frequently as requested by the system set-up requirements.
- 5) All information relating to our clients/customers and our business operations is confidential. You must treat our paper-based and electronic information with utmost care.
- 6) Many aspects of communication are protected by intellectual property rights which can be infringed in a number of ways. Downloading, copying, possessing and distributing material from the internet may be an infringement of copyright or of other intellectual property rights.
- 7) Particular care must be taken when using e-mail as a means of communication because all expressions of fact, intention and opinion in an e-mail may bind you and/or the Company and can be produced in court in the same way as other kinds of written statements.
- 8) If you are speaking with someone face to face, via the telephone, in writing via whatever medium you are a representative of the Company. Whilst in this role you should not express any personal opinion that you know or suspect might be contrary to the opinions of the Directors or Company policy.
- 9) You must not use any of our or our clients' media to do or say anything which would be subject to disciplinary or legal action in any other context such as sending any sexist, racist, defamatory or other unlawful material. If you are in doubt about a course of action, take advice from a member of management.

## C) USE OF ELECTRONIC MAIL

- 1) **Business use**

Always use the "Bcc" box when mailing to groups whenever the members of the group are unaware of the identity of all the others (as in the case of marketing mailing lists), or where you judge that the membership of the group of one or more individuals should perhaps not be disclosed to the others (as in the case of members of a staff benefit scheme), because if you use the "Cc" box each recipient is informed of the identity (and in the case of external recipients, the address) of all the others. Such a disclosure may breach any duty of confidence owed to each recipient, breach the Company's obligations under the General Data Protection Regulation and Data Protection Act or may inadvertently disclose confidential business information such as a marketing list. This applies to both external and internal e-mail.

Expressly agree with the customer/client that the use of e-mail is an acceptable form of communication bearing in mind that if the material is confidential, privileged or commercially sensitive then un-encrypted e-mail is not secure.

If you have sent an important document, always telephone to confirm that the e-mail has been received and read.

In light of the security risks inherent in web-based e-mail accounts, you must not e-mail business documents to your personal web-based accounts. You may send documents to a customer's/client's web-based account if you have the customer's/client's express written permission to do so. However, under no circumstances should you send sensitive or highly confidential documents to a customer's/client's personal web-based e-mail account (e.g. Yahoo, or Hotmail), even if the customer/client asks you to do so.

## 2) Personal use

- a) Although our e-mail facilities are provided for the purposes of our business, we accept that you may occasionally want to use them for your own personal purposes. This is permitted on condition that all the procedures and rules set out in this policy are complied with. Be aware, however, that if you choose to make use of our facilities for personal correspondence, the Company may need to monitor communications for the reasons shown below.
- b) Under no circumstances may the Company's facilities be used in connection with the operation or management of any business other than that of the Company or a customer/client of the Company unless express permission has been obtained from a member of management.
- c) You must ensure that your personal e-mail use:
  - does not interfere with the performance of your duties;
  - does not take priority over your work responsibilities;
  - does not cause unwarranted expense or liability to be incurred by the Company or our clients;
  - does not have a negative impact on our business in any way; and
  - is lawful and complies with this policy.
- d) The Company will not tolerate the use of the E-mail system for unofficial or inappropriate purposes, including:
  - (i) any messages that could constitute bullying, harassment or other detriment;
  - (ii) on-line gambling;
  - (iii) accessing or transmitting pornography;
  - (iv) transmitting copyright information and/or any software available to the user; or
  - (v) posting confidential information about other employees, the Company or its customers or suppliers.

## D) USE OF INTERNET

## **AND INTRANET**

- 1) We trust you to use the internet sensibly. Although internet facilities are provided for the purposes of our business, we accept that you may occasionally want to use them for your own personal purposes. This is permitted on condition that all the procedures and rules set out in this policy are complied with and your use of the internet does not interfere in any way with the performance of your duties.
- 2) Whenever you access a web site, you should always comply with the terms and conditions governing its use. Care must be taken in the use of information accessed through the Internet. Most information is unregulated, and as such there is no guarantee of accuracy.
- 3) The use of the Internet to access and/or distribute any kind of offensive material, or material that is not work-related, leaves an individual liable to disciplinary action which could lead to dismissal.
- 4) You must not:
  - a) use any images, text or material which are copyright-protected, other than in accordance with the terms of the license under which you were permitted to download them;
  - b) introduce packet-sniffing or password-detecting software;
  - c) seek to gain access to restricted areas of the Company's network;
  - d) access or try to access data which you know or ought to know is confidential;
  - e) introduce any form of computer virus; nor
  - f) carry out any hacking activities.

## **E) VIRUS PROTECTI ON PROCEDUR ES**

In order to prevent the introduction of virus contamination into the software system the following must be observed:-

- a) unauthorised software including public domain software, magazine cover disks/CDs or Internet/World Wide Web downloads must not be used; and
- b) all software must be virus checked using standard testing procedures before being used.

## **F) USE OF COMPUTER EQUIPMEN T**

In order to control the use of the Company's computer equipment and reduce the risk of contamination the following will apply:

- a) The introduction of new software must first of all be checked and authorised by a member of management or a client's nominated senior member of management before general use will be permitted.
- b) Only authorised staff should have access to the Company's computer equipment.
- c) Only authorised software may be used on any of the Company's computer equipment.
- d) Only software that is used for business applications may be used.
- e) No software may be brought onto or taken from the Company's premises without prior authorisation.
- f) Unauthorised access to the computer facility will result in disciplinary action.

- g) Unauthorised copying and/or removal of computer equipment/software will result in disciplinary action, such actions could lead to dismissal.

#### **G) SYSTEM SECURITY**

- 1) Security of our or our clients' IT systems is of paramount importance. We owe a duty to all of our customers/clients to ensure that all of our business transactions are kept confidential. If at any time we need to rely in court on any information which has been stored or processed using our IT systems it is essential that we are able to demonstrate the integrity of those systems. Every time you use the system you take responsibility for the security implications of what you are doing.
- 2) The Company's system or equipment must not be used in any way which may cause damage, or overloading or which may affect its performance or that of the internal or external network.
- 3) Keep all confidential information secure, use it only for the purposes intended and do not disclose it to any unauthorised third party.

#### **H) WORKING REMOTELY**

- 1) This part of the policy and the procedures in it apply to your use of our systems, to your use of our laptops, and also to your use of your own computer equipment or other computer equipment (e.g. client's equipment) whenever you are working on Company business away from our premises (working remotely).
- 2) When you are working remotely you must:
  - a) password protect any work which relates to our business so that no other person can access your work;
  - b) position yourself so that your work cannot be overlooked by any other person;
  - c) take reasonable precautions to safeguard the security of our laptop computers and any computer equipment on which you do Company business, and keep your passwords secret;
  - d) inform the police and the Company as soon as possible if either a Company laptop in your possession or any computer equipment on which you do our work has been stolen; and
  - e) ensure that any work which you do remotely is saved on the Company system or is transferred to our system as soon as reasonably practicable.
- 3) PDAs or similar hand-held devices are easily stolen and not very secure so you must password-protect access to any such devices used by you on which is stored any personal data of which the Company is a data controller or any information relating our business, our clients or their business.

#### **I) PERSONAL TELEPHONE CALLS/ MOBILE PHONES**

- 1) Telephones are essential for our business. Incoming/outgoing personal telephone calls are allowed at the Company's head office but should be kept to a minimum. We reserve the right to recharge for excessive personal use. When visiting or working on client premises you should always seek permission before using our clients' telephone facilities.
- 2) Personal mobile phones should be switched off or 'on silent' during working hours and only used during authorised breaks.

#### **J) MONITORING OF COMMUNICATIONS**

## **ATIONS BY THE COMPANY**

- 1) The Company is ultimately responsible for all business communications but subject to that will, so far as possible and appropriate, respect your privacy and autonomy. The Company may monitor your business communications for reasons which include:
  - a) providing evidence of business transactions;
  - b) ensuring that our business procedures, policies and contracts with staff are adhered to;
  - c) complying with any legal obligations;
  - d) monitoring standards of service, staff performance, and for staff training;
  - e) preventing or detecting unauthorised use of our communications systems or criminal activities; and
  - f) maintaining the effective operation of Company communication systems.
- 2) From time to time the Company may monitor telephone, e-mail and internet traffic data (i.e. sender, receiver, subject; non-business attachments to e-mail, numbers called and duration of calls; domain names of web sites visited, duration of visits, and non-business files downloaded from the internet) at a network level (but covering both personal and business communications). This includes monitoring of any additional accounts you may be requested to set up for the purposes of performing your work tasks, which are subject to the same rules as your work email account. Information acquired through such monitoring may be used as evidence in disciplinary proceedings.
- 3) Sometimes it is necessary for us to access your business communications during your absence, such as when you are away because you are ill or while you are on holiday.

## **K) DATA PROTECTI ON**

- 1) As an employee using our communications facilities, you will inevitably be involved in processing personal data for the Company as part of your job. Data protection is about the privacy of individuals, and is governed by the General Data Protection Regulation and current Data Protection Act.
- 2) Whenever and wherever you are processing personal data for the Company you must keep this secret, confidential and secure, and you must take particular care not to disclose such data to any other person (whether inside or outside the Company) unless authorised to do so. Do not use any such personal data except as authorised by us for the purposes of your job. If in doubt ask a member of management.
- 3) The Act gives every individual the right to see all the information which any data controller holds about them. Bear this in mind when recording personal opinions about someone, whether in an e-mail or otherwise. It is another reason why personal remarks and opinions made should be given responsibly, must be relevant and appropriate as well as accurate and justifiable.
- 4) For your information, the Act provides that it is a criminal offence to obtain or disclose personal data without the consent of the data controller. "Obtaining" here includes the gathering of personal data by employees at work without the authorisation of the employer. You may be committing this offence if without authority of the Company: you exceed your authority in collecting personal data; you access personal data held by us; or you pass them on to someone else (whether inside or outside the Company).

## **L) USE OF SOCIAL NETWORKI NG SITES**

Any work related issue or material that could identify an individual who is a customer/client or work colleague, which could adversely affect the company a customer/client or our relationship with any customer/client must not be placed on a social networking site. This means that work related matters must not be placed on any such site at

any time either during or outside of working hours and includes access via any computer equipment, mobile phone or PDA.

**M) CONFIDENTIALITY**

Employees are not permitted to register with sites or electronic services in the company's name without the prior permission of their manager. They are not permitted to reveal internal company information to any sites, be it confidential or otherwise, or comment on company matters, even if this is during after-hours or personal use. The company confidentiality policy applies to all electronic communication and data.

**N) COMPLIANCE WITH THIS POLICY**

- 1) Failure to comply with this policy may result in disciplinary action being taken against you. If there is anything in this policy that you do not understand, please discuss it with a member of management.
- 2) Please note that the procedures and policies outlined in this policy, and in any related policy, may be reviewed or changed at any time.

# Data Protection Policy

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## A) INTRODUCTION

We may have to collect and use information about people with whom we work. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of personal data in manual and electronic records kept by us in connection with our human resources function as described below. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers and self-employed contractors. These are referred to in this policy as relevant individuals.

## B) DEFINITIONS

“Personal data” is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person’s name, identification number, location, online identifier. It can also include pseudonymised data.

“Special categories of personal data” is data which relates to an individual’s health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

“Criminal offence data” is data which relates to an individual’s criminal convictions and offences.

“Data processing” is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## C) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose

- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant GDPR procedures for international transferring of personal data

#### **D) TYPES OF DATA HELD**

We keep several categories of personal data on our employees in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each employee and we also hold the data within our computer systems, for example, our holiday booking system.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers
- b) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter, references from former employers, details on your education and employment history etc
- c) details relating to pay administration such as National Insurance numbers, bank account details and tax codes
- d) medical or health information
- e) information relating to your employment with us, including:
  - i) job title and job descriptions
  - ii) your salary
  - iii) your wider terms and conditions of employment
  - iv) details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
  - v) internal and external training modules undertaken

All of the above information is required for our processing activities. More information on those processing activities are included in our privacy notice for employees, which is available from your manager.

#### **E) EMPLOYEE RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed “Access to Data” below and in our separate policy on Subject Access Requests”;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on employee rights under GDPR.

#### **F) RESPONSIBILITIES**

In order to protect the personal data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection.



We have also appointed employees with responsibility for reviewing and auditing our data protection systems.

## **G) LAWFUL BASES OF PROCESSING**

We acknowledge that processing may be only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the employee's consent in order to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Employees will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

## **H) ACCESS TO DATA**

As stated above, employees have a right to access the personal data that we hold on them. To exercise this right, employees should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request is contained in our Subject Access Request policy.

## **I) DATA DISCLOSURES**

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- a) any employee benefits operated by third parties;
- b) disabled individuals - whether any reasonable adjustments are required to assist them at work;
- c) individuals' health data - to comply with health and safety or occupational health obligations towards the employee;
- d) for Statutory Sick Pay purposes;
- e) HR management and administration - to consider how an individual's health affects his or her ability to do their job;
- f) the smooth operation of any employee insurance policies or pension plans;
- g) to assist law enforcement or a relevant authority to prevent or detect crime or prosecute offenders or to assess or collect any tax or duty.

These kinds of disclosures will only be made when strictly necessary for the purpose.

## **J) DATA SECURITY**

All our employees are aware that hard copy personal information should be kept in a locked filing cabinet, drawer, or safe.

Employees are aware of their roles and responsibilities when their role involves the processing of data. All employees are instructed to store files or written information of a confidential nature in a secure manner so that are only accessed by people who have a need and a right to access them and to ensure that screen locks are implemented on all PCs, laptops etc when unattended. No files or written information of a confidential nature are to be left where they can be read by unauthorised people.

Where data is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Employees must always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.

Personal data relating to employees should not be kept or transported on laptops, USB sticks, or similar devices, unless prior authorisation has been received. Where personal data is recorded on any such device it should be protected by:

- a) ensuring that data is recorded on such devices only where absolutely necessary.
- b) using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- c) ensuring that laptops or USB drives are not left where they can be stolen.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinary procedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

## **K) THIRD PARTY PROCESSING**

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

## **L) INTERNATIONAL DATA TRANSFERS**

Delete as appropriate

The Company does not transfer personal data to any recipients outside of the EEA.

OR

The Company may be required to transfer personal data to a country/countries outside of the EEA. Transfers may take place because (provide details on why transfer may have to take place). Where this occurs, the following safeguards are adopted (insert details eg binding corporate rules/standard data protection clauses/compliance with an approved code of practice etc).

## **M) REQUIREMENT TO NOTIFY BREACHES**

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

More information on breach notification is available in our Breach Notification policy.

## **N) TRAINING**

New employees must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data controller/auditors/protection officers for the Company are trained appropriately in their roles under the GDPR.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

**O) RECORDS**

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its HR Data Record. These records will be kept up to date so that they reflect current processing activities.

**P) DATA PROTECTION COMPLIANCE**

Delete as appropriate

Our Data Protection Officer is:

\_\_\_\_\_ (Name)  
\_\_\_\_\_ (Contact details).

OR

Our appointed compliance officer in respect of our data protection activities is:

\_\_\_\_\_ (Name)  
\_\_\_\_\_ (Contact details).