



# NHS Wales Internet Use Policy

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## 1. Introduction

This document is issued under the All Wales Information Governance Policy Framework and maintained by the NHS Wales Informatics Service (NWIS) on behalf of all NHS Wales organisations.

## 2. Purpose

This policy provides assurance that NHS Wales internet facilities are being used appropriately to assist in delivering services.

The policy also sets out the responsibilities of all users when using the internet. These responsibilities include, but are not restricted to, ensuring that:

- The confidentiality, integrity, availability and suitability of information and NHS computer systems are maintained by ensuring use of internet services is governed appropriately;
- All individuals as referenced within the scope of this policy are aware of their obligations.

This policy must be read in conjunction with relevant organisational procedures.

## 3. Scope

This policy applies to the workforce of all NHS Wales organisations including staff, students, trainees, secondees, volunteers, contracted third parties and any persons undertaking duties on behalf of NHS Wales.

For the purpose of this policy 'NHS Wales Organisations' will include all NHS Wales organisations including all Health Boards and NHS Trusts.

The policy describes the principles which must be adhered to by all in the use of the internet, the NHS Wales Network (which is defined as a corporate Intranet) and other affiliated sites.

The terms "internet access" or "internet use" encompass any use of any resources of the internet including social media / social networking, browsing, streaming, downloading, uploading, posting, "blogging", "tweeting", chat and email. The NHS Wales Social Media Policy provides information on the appropriate use of social media.

This policy applies to all staff that make use of the NHS network infrastructure and / or NHS equipment to access internet services regardless of the location from which they accessed and the type of equipment that is used including corporate equipment, third party and personal devices.

## 4. Roles and responsibilities

The Chief Executive is responsible for ensuring the highest level of organisational commitment to the policy and the availability of resources to support its implementation and any associated legal requirements. Specific responsibilities will be delegated to the Data Protection Officer, Senior Information Risk Officer and the Caldicott Guardian or an Executive Director as appropriate.

Managers are responsible for the implementation of this policy within their department/directorate. In addition, they must ensure that their staff are aware of this policy, understand their responsibilities in complying with the policy requirements and are up to date with mandatory information governance training. Breaches of the policy must be reported via local incident reporting processes and dealt with in line with the All Wales Disciplinary Policy where appropriate.

The workforce must familiarise themselves with the policy content and ensure the policy requirements are implemented and followed within their own work area. Mandatory information governance training must be undertaken at least every two years. Breaches of this policy must be reported via local incident reporting processes.

## 5. Policy

### 5.1 Position Statement

Internet access is provided to staff to assist them in the performance of their duties and the provision of these facilities represents a major commitment on the part of NHS Wales in terms of investment and resources.

The NHS Wales workforce should become competent in using internet services to the level required for their role in order to be more efficient and effective in their day-to-day activities.

NHS Wales will support its workforce in understanding how to safely use internet services and it is important that users understand the legal, professional and ethical obligations that apply to its use. If used correctly, the internet can increase efficiency and safety within patient care.

### 5.2 Conditions & Restrictions

To avoid inadvertent breaches of this policy, inappropriate content will be blocked by default where possible. Inappropriate material must not be accessed. Exceptions may be authorised for certain staff where access to particular web pages are a requirement of the role. Subject matter considered inappropriate is detailed in appendix A.

Some sites may be blocked by default due to their general impact on network resources and access to these for work purposes can be requested by contacting the Local IT Service Desk.

Regardless of where accessed users must not participate in any online activity or create or transmit or store material that is likely to bring the organisation into disrepute or incur liability on the part of NHS Wales.

Business Sensitive Information or Personal Data (which includes photographs and video recordings) of any patient, member of the public, or member of staff taken on NHS Wales premises must not be uploaded to any form of non NHS approved online storage, media sharing sites, social media, blogs, chat rooms or similar, without both the authorisation of a head of service and the consent of the individual who is the Data Subject of that recording. The NHS Wales Social Media Policy provides information on the appropriate use of social media.

It is each user's responsibility to ensure that their internet facilities are used appropriately. Managers are reminded that, as an NHS Wales resource, the internet is in many ways similar to the telephone systems and should be managed accordingly.

## 5.3 Personal Use

NHS Wales organisations allow staff reasonable personal use of internet services providing this is within the bounds of the law and decency and compliance with policy.

Personal use should be incidental and reasonable. As a threshold, NHS Wales defines this as a maximum of thirty minutes in one calendar day and before or after normal working hours, or during agreed break times. These limitations are also necessary due to network demands and therefore local restrictions may apply dependent on the duration of access and the capacity of resources available. In addition to this, users must not stream or download large volumes of data (e.g. streaming audio or video, multimedia content, software packages) as these may have a negative impact on network resources.

Where local organisations have provided patients and staff with access to public Wi-Fi services, employees are encouraged to use these facilities by default on personally-owned devices instead of using NHS equipment. Local agreements will be in place for the use of and availability of these facilities.

Staff who use NHS equipment outside NHS Wales premises (for example – in a home environment) are permitted to connect to the internet. Use of the internet under these circumstances must be through the secure connection provided by the NHS Wales organisation (for example via VPN, Multi Factor Authentication). Use of the equipment for such purposes is still subject to the same conditions as laid out in this policy.

All personal use of the internet is carried out at the user's own risk. The NHS Wales does not accept responsibility or liability for any loss caused by or liability arising from personal use of the internet.

Internet access facilities must not be used to run or support any kind of paid or unpaid personal business venture outside work, whether or not it is conducted in a user's own time or otherwise.

At no time should access to the internet be used by any individual for personal financial gain (E.g. using eBay or any other auction sites).

## 6. Training and Awareness

Information governance is everyone's responsibility. Training is mandatory for NHS staff and must be completed at commencement of employment and at least every two years subsequently. Non NHS employees must have appropriate information governance training in line with the requirements of their role.

Staff who need support in understanding the legal, professional and ethical obligations that apply to them should contact their local information governance department.

The NHS Wales workforce should become competent in using internet services to the level required of their role in order to be efficient and effective in their day-to-day activities.

## 7. Monitoring and compliance

NHS Wales trusts its workforce.

NHS Wales reserves the right to monitor work processes to ensure the effectiveness of the service. This will mean that any personal activities that the employee practices in work may come under scrutiny. NHS Wales

organisations respect the privacy of its employees and does not want to interfere in their personal lives but monitoring of work processes is a legitimate business interest.

NHS Wales uses software to automatically and continually record the amount of time spent by staff accessing the internet and the type of websites visited by staff. Attempts to access any prohibited websites which are blocked is also recorded.

Staff should be reassured that NHS Wales organisations take a considered approach to monitoring, however it reserves the right to adopt different monitoring patterns as required. Monitoring is normally conducted where it is suspected that there is a breach of either policy or legislation or when a manager has concerns around employees performance, (e.g. excessive internet usage). Furthermore, on deciding whether such analysis is appropriate in any given circumstances, full consideration is given to the rights of the employee.

Managers are expected to speak to staff of their concerns should any minor issues arise. If breaches are detected an investigation may take place. Where this or another policy is found to have been breached, disciplinary procedures will be followed.

Concerns about possible fraud and/or corruption should be reported to the counter fraud team.

In order for NHS organisations to achieve good information governance practice, staff must be encouraged to recognise the importance of good governance and report any breaches to enable lessons learned. They must be provided with the necessary tools, support, knowledge and training to help them deliver their services in compliance with legislation. Ultimately a skilled workforce will have the confidence to challenge bad IG practice, and understand how to use information legally in the right place and at the right time. This should minimise the risk of incidents occurring or re-occurring.

## 8. Review

This policy will be reviewed every two years or more frequently where the contents are affected by major internal or external changes such as:

- Changes in legislation;
- Practice change or change in system/technology; or
- Changing methodology.

## 9. Equality Impact Assessment

This policy has been subject to an equality assessment.

Following assessment, this policy was not felt to be discriminatory or detrimental in any way with regard to the protected characteristics, the Welsh Language or carers.

## Appendix A - Inappropriate use

For the avoidance of doubt, inappropriate use includes, but is not limited to:

- Excessive personal use.
- Allowing access to NHS Wales internet services by anyone not authorised to access the services, such as by a friend or family member.
- Communicating or disclosing confidential or sensitive information via the internet without authorisation or without the appropriate security measures being in place.
- Downloading or communicating any information or images which are unlawful, or could be regarded as defamatory, offensive, abusive, obscene, hateful, pornographic, violent, terrorist, indecent, being discriminatory in relation to the protected characteristics,; or using the email system to inflict bullying or harassment on any person.
- Downloading, uploading, transmitting, viewing, publishing, storing or distributing defamatory material or intentionally publishing false information about NHS Wales or its staff, clients or patients.
- Knowingly accessing, or attempting to access internet sites that contain obscene, hateful, pornographic, violent, terrorist, racist or otherwise illegal material. This will include such pages on social media sites.
- Knowingly and without authority view, upload, or download material that may bring NHS Wales into disrepute; or material that could cause offence to others.
- Sending or saving information or images which could be considered defamatory, obscene, hateful, pornographic, violent, terrorist, racist or otherwise illegal material.
- Downloading or installing or distributing unlicensed or illegal software.
- Downloading software without authorisation or changing the configuration of existing software using the internet without the appropriate permissions.
- Breaching copyright or Intellectual Property Rights (IPR).
- 'Hacking' into others accounts or unauthorised areas.
- Deliberately attempting to circumvent security systems protecting the integrity of the NHS Wales network.
- Any purpose that denies service to other users (for example, deliberate or reckless overloading of access links or switching equipment).
- Intentionally introducing malicious software such as Viruses, Worms, and Trojans into the NHS Wales network.
- To access sites with the intention of making a personal gain (for example - running a business).
- Access to internet based e-mail providers such as Gmail, Hotmail, Yahoo etc is prohibited for reasons of security with the exception of:
  - Access to email services provided by a recognised professional body or a trade union recognised by the employer;
  - Any UK university hosted e-mail account (accounts ending in .ac.uk);
  - Any email account hosted by a body which the employee contributes to in conjunction with their NHS role, such as a local authority or tertiary organisation.



- Altering any of the system settings on a NHS Wales owned PC or trying to change the access server in an attempt to avoid the restriction imposed by the filtering software. This will be deemed as a breach of this policy and will be dealt with under the All Wales Disciplinary Policy.

## Annex 1: Policy Development - Version Control

### Revision History

| Date       | Version | Author  | Revision Summary                  |
|------------|---------|---|-----------------------------------|
| 26/06/2018 | 2       | Andrew Fletcher (Chair of the IGMAG policy sub group) | Original policy as approved.      |
| 1/12/2020  | 2.1     | Andrew Fletcher (Chair of the IGMAG policy sub group) | Policy with incorporated comments |
| 14/01/2021 | 3       | Andrew Fletcher (Chair of the IGMAG policy sub group) | Final Policy                      |

### Reviewers

This document requires the following reviews:

| Date       | Version | Name   | Position   |
|------------|---------|--|--|
| 1/12/2020  | 2.1     | IGMAG Policy sub group                               | Sub group of the Information Governance Management and Advisory Group        |
| 4/01/2021  | 2.1     | Information Governance Management and Advisory Group | All Wales Information Governance Leads                                       |
| 4/01/2021  | 2.1     | Welsh Partnership Forum                              | All Wales workforce leads and trade unions                                   |
| 7/01/2021  | 2.1     | Equality Impact Assessment                           | NWIS Equality Impact Assessment Group  |
| 14/01/2021 | 2.1     | Information Governance Management and Advisory Group | All Wales Information Governance Leads                                       |
| 14/01/2021 | 2.1     | Wales Information Governance Board                   | Advisory Board to the Minister for Health and Social Care (Welsh Government) |

### Approvers

This document requires the following approvals:

| Date       | Version | Name   | Position   |
|------------|---------|--|--|
| 4/01/2020  | 3       | Information Governance Management and Advisory Group | All Wales Information Governance Leads                                       |
| 14/01/2021 | 3       | Wales Information Governance Board                   | Advisory Board to the Minister for Health and Social Care (Welsh Government) |