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Public Health
Wales

Reference Number: PHW13/TP03
Version Number: 1
Date of Next review: January 2020

REMOTE WORKING PROCEDURE (INFORMATION GOVERNANCE)

Introduction and Aim

Public Health Wales is a large, diverse organisation spanning the whole Country. Public Health Wales is committed to creating

'...a positive work environment, based on mutual respect and trust characterised by high levels of collaboration and teamwork, driven by excitement and ambition to exceed expectations.' (IMTP, 2016)

There is a clear emphasis here on the need for collaboration and teamwork, and the best way to achieve this is by bringing people together and engaging and inspiring them to achieve great things. However, Public Health Wales recognises that in some cases by the very nature of the organisation it is neither possible nor desirable to constrain people to working at a fixed location, be it an office or a desk, and there is a need for a flexible approach to where, when and how our people work.

For this reason, Public Health Wales supports the principle of remote working when the arrangements are authorised (with reference to the flexible working toolkit where relevant) and appropriate safeguards have been put in place to protect both the staff member involved and also the organisation.

For full details on Flexible Working, the Flexible Working Toolkit should be consulted.

The processes that follow outline the steps needed to be taken in order for staff to work safely and legally in relation to Information Governance.

Linked Policies, Procedures and Written Control Documents

Information Governance Policy

Flexible Working Toolkit

Scope

This procedure applies to all Public Health Wales staff who are required to work remotely. Any reference in this document to Public Health Wales I.T. equipment includes any other system or network provided to the user in connection with their employment (e.g. email and other nationally hosted services).

Equality and Health Impact Assessment

This is covered by the overarching EHIA required under the Information Governance Policy

Approved by

Information Governance Working Group

Approval Date	22 January 2018
Review Date	22 January 2020
Date of Publication:	17 May 2018
Accountable Executive Director/Director	Sian Bolton, Acting Executive Director Quality, Nursing and Allied Healthcare Professionals
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Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the [Corporate Governance](#).

Summary of reviews/amendments				
Version number	Date of Review	Date of Approval	Date published	Summary of Amendments
1	22 Jan 2018	22 Jan 2018	17 May 2018	New document.

1. Introduction

This procedure is intended to set out the organisation's requirements on our staff working remotely in relation to Information Governance, and to outline the processes which need to be followed in order for such staff to be able to work safely and legally.

This procedure supplements the Flexible Working Toolkit. Examples of remote working include:

- Working from home
- Reading reports / papers whilst travelling by train or bus
- Working from public venues (e.g. coffee shops)
- Working whilst staying in Hotels on Public Health Wales business
- Working abroad

2. Roles and responsibilities

Line Managers will:

- Manage staff who need to work remotely in accordance with the provisions of the Flexible Working Toolkit.
- Discuss remote working requirements with staff at the regular one to one meetings.
- Regularly review risk assessments with remote working staff to ensure that there are no material changes.
- Assess any request from staff to access systems whilst on sick leave and grant authority if deemed appropriate.

Remote working staff will:

- Ensure that they comply at all times with this procedure.
- Report any changes in their circumstances which may affect their ability to effectively work from home to their line manager immediately (including illness, caring responsibilities or other distractions).
- Not access any Public Health Wales or I.T. system whilst on sick leave for any reason, without the express permission of their line manager.

3. Procedure

General provisions

The working of this procedure relies heavily on effective relationships between managers and their staff.

Authority for remote working

No member of staff will work remotely unless authorised by their line manager. In the absence of extenuating circumstances, managers will not authorise remote working for anyone who is not up to date with mandatory training in Information Governance.

This does not necessarily mean that permission needs to be sought on each and every occasion. Some members of staff by the nature of their role will be required to work remotely on a regular basis, and this should be discussed early on in the relationship so that the requirements and boundaries are clearly understood by both manager and staff. Remote working should then form part of usual one to one discussions to ensure that the arrangements are still appropriate.

Working from home

The ability to work from home is transforming many service industries and it can be beneficial to both organisations and staff. However it must be remembered that Public Health Wales staff who are working from home are still working for Public Health Wales and as such are still subject to all organisational requirements, policies and procedures in relation to Information Governance. This places certain responsibilities on both manager and staff member which are detailed later in this document.

Information Governance and security

Any member of staff handling Public Health Wales information is responsible for the security of that information. Whilst extra precautions may be necessary for confidential and person / patient identifiable information, all information must be treated with care to ensure that it is not lost, damaged or released into the public domain. Care must be taken to ensure that other family members or visitors to the home cannot see or otherwise gain access to Public Health Wales information and that all of the usual information security arrangements in place in the normal workplace must also be applied in the home environment (clear

desks, locking of screens etc.). All of these issues are covered in the Public Health Wales Information Governance (IG) training which is mandatory for all staff. Line Managers must ensure that anyone who works from home is up to date with their mandatory IG training. Authority to work remotely will not normally be given for anyone who is out of compliance.

It is the responsibility of the staff member working from home to ensure that any IT equipment that they use to connect to a Public Health Wales network or system is secure and sufficiently robust in terms of reliability and availability. If there is any doubt as to the suitability of equipment in use at home specialist advice must be sought from the Head of IM&T.

Any staff member working from home who suspects that the security of their network may have been compromised by malware or unauthorised hacking, must immediately disconnect any Public Health Wales equipment from the network, and inform the Head of IM&T.

The cost of purchasing and maintaining personal IT equipment even where it is used in connection with Public Health Wales business will normally be the responsibility of the person in question.

Distractions

Working from home, whilst often convenient and expedient can sometimes be problematic. The home environment can be full of distractions that are generally not present in the workplace, including:

- Caring responsibilities
- Pets
- Visitors
- Domestic emergencies
- Chores requiring attention

It is the responsibility of any person who is working from home to ensure that they can work in an environment that is suitably free from any distractions which could negatively impact upon their work and in particular maintaining confidentiality and security of information and systems. Line managers authorising staff to work from home must make themselves aware of any pressures which staff may be under that could affect their work.

In the event that a distraction is likely to affect their work, then other options to support the staff member may need to be explored.

Safeguarding considerations

Line managers must be alert to the possibility of underlying reasons for staff members wishing to work from home particularly if there is a sudden change in the arrangements, or the emphasis shifts from an organisational requirement to a personal one. A sudden increase in personal requirements to work from home or unexplained urgent requirements on behalf of staff members could be the sign of underlying domestic problems. For further advice, line managers should refer to their Safeguarding training or any member of the Corporate Safeguarding Team

Working from home when unwell

Home working should not generally be seen by staff or managers as an alternative to reporting sick. The default position is that if you are not fit to work, you are not fit to work from home. Whilst it can occasionally be acceptable, and even in the interests of both the staff member and Public Health Wales for such an arrangement to be in place, it must be subject to a careful assessment by the line manager. An example may be where a staff member is recovering from an operation and is perfectly lucid and able to function, but unable to travel into the office.

Home working can under the right circumstances also be a reasonable adjustment for a person with disabilities.

Staff members must consider their personal circumstances, including the possible effects of any medication they may be taking. Line managers must remember that they have a duty of care to their staff including those working from home and they will need to satisfy themselves that the staff member is sufficiently fit to perform their duties and in particular able to maintain confidentiality and security of information and systems. If there is any doubt, specialist occupational health advice should be sought.

Staff who are working from home and handling Public Health Wales information must understand that they are solely responsible for the security and integrity of that information. Staff are reminded that they have access to Public Health Wales I.T. systems for the purposes of performing their duties. Anyone

therefore who is at home and unfit for work will not access any Public Health Wales I.T. system without prior authorisation from their line manager.

If in doubt – don't work.

Working in a public environment

Working in public environments can mean anything from making and taking telephone calls, to reading reports and papers, or working on a laptop reading confidential information. Staff members conducting business in public places must be alert to the environment in which they are working. Extra care must be taken with information to ensure that it is not lost, or inadvertently left behind, and particular care needs to be exercised to ensure that confidential material cannot be seen by unauthorised persons, or telephone calls overheard. Staff also need to be alert for their personal security when using technology (tablets, laptops etc) in public places where there may be a danger of attempts to steal it. Guidance is produced by the Risk and Information Governance Team and anyone who may need to work in public places should make themselves aware of the guidance.

Working in another NHS environment other than Public Health Wales.

Working anywhere outside of the Public Health Wales environment should be considered to be the same as working in public, even in another NHS organisation and all of the same precautions should be adopted.

4. Training requirements

All staff are required to undertake Information Governance mandatory training every two years. This procedure will be covered within that training.

5. Monitoring compliance

All managers who have responsibility for staff working remotely are responsible for monitoring compliance.