

ONLINE SERVICE DELIVERY POLICY AND PROCEDURES (FORMERLY SKYPE P&P)

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1 This Policy and these Procedures arise from

- 1.1 The Adoption Support Agencies (England) and Adoption Agencies (Miscellaneous Amendments) Regulations 2005, (Regulations 14, 15 and 22), and the National Minimum Standards for Adoption Support (Standard 17).
- 1.2 PAC-UK is committed to carrying out and meeting in full the requirements of the Data Protection Act, 1998 (the "Act") in processing all personal data in connection with its work. Its staff and trustees are therefore required to familiarise themselves with the requirements of the Act and to ensure that these are fully met.
- 1.3 In line with the Data Protection Act 1998 principles, PAC-UK will ensure that personal data will:
 - Be obtained fairly and lawfully and shall not be processed unless certain conditions are met.
 - Be obtained for a specific and lawful purpose.
 - Be adequate, relevant but not excessive.
 - Be accurate and kept up to date.
 - Not be held longer than necessary.
 - Be processed* in accordance with the rights of data subjects.
 - Be subject to appropriate security measures.
 - Not to be transferred outside the European Economic Area (EEA).

*the definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.
- 1.4 This Policy and these Procedures should always be followed in conjunction with PAC-UK's Data Protection, Data Security and Social Media Policy and Procedures which is reviewed annually to ensure it remains up to date and compliant with the law.

2 Introduction and aims of this policy

- 2.1 The aim of this policy is to ensure that everyone using online services (including video conferencing such as Skype and FaceTime and mobile phone apps such as WhatsApp) for counselling sessions/meetings is fully aware of the requirements, has been given the appropriate level of training and acts in accordance with data protection procedures.
- 2.2 This policy covers employed staff, sessional workers, trustees and volunteers.

3 Policy implementation

- 3.1 To meet our responsibilities staff, volunteers and trustees will:
- Ensure any personal data is collected in a fair and lawful way.
 - Explain why it is needed at the start.
 - Ensure that only the minimum amount of information needed is collected and used.
 - Ensure the information used is up to date and accurate.
 - Review the length of time information is held.
 - Ensure it is kept safely.
 - Ensure the rights people have in relation to their personal data can be exercised.
- 3.2 PAC-UK will ensure that:
- Everyone using online services for counselling sessions/meetings is trained to do so.
 - Anyone wanting to make enquiries about using online services for counselling sessions/meetings, whether a member of staff, volunteer or service user, knows what to do.
 - Any disclosure of personal data will be in line with our procedures.
 - Training and raising awareness about how PAC-UK uses online services within the organisation will be part of every new employee's induction training programme.
 - PAC-UK's Online Service Delivery Policy & Procedures will be reviewed annually and all PAC-UK employees will receive policy update notifications.

4 Individual responsibilities

- 4.1 All staff and volunteers have a duty to observe the requirements of the Data Protection Act and the PAC-UK policy in relation to it.
- 4.2 Individuals who do not handle personal data as part of their normal work still have a responsibility to ensure that any personal data they see or hear goes no further. This includes personal data and any information extracted from such data. Unauthorised disclosure might occur e.g. by passing information over the telephone, communicating information on a computer print-out or even inadvertently by reading a computer screen.

5 Online data security guidelines for all staff and volunteers

- 5.1 Do not leave information about individuals on your desk when you are not using it before/after your online session.
- 5.2 Do not leave personal data displayed on mobile or computer screen, do not leave your computer logged on and unattended or the mobile phone unlocked.
- 5.3 Do not give your password to anyone and do not change the password given to you by your Line Manager unless authorised to do so.
- 5.4 Ensure you logoff/shut the app down properly at the end of each session.
- 5.5

6 PAC-UK's social media rules

- 6.1 The term Social Media refers to a number of websites and internet media resources which enable users to share information, opinions and social exchanges.

They are normally free to use, are unregulated except by the users themselves, and can be used or looked at by anyone with internet access, anywhere in the world. Examples of social media are blogs, social networking sites (e.g. Facebook and Twitter), podcasts, message boards and chat rooms.

- 6.2 We recognise that employees will use these media outside work, and they can be usefully used within work to make business contacts, exchange ideas and views about products and issues, and improve customer service.
- 6.3 Because of the global nature of the media and its potential, some rules need to be devised to ensure the media are used safely and effectively, and these are set out below:
 - a) You may only login to the backend of PAC-UK's social media streams and make posts on behalf of PAC-UK if approved by PAC-UK's CEO.

- b) You may not share any information which is commercially sensitive, private or copyrighted.
- c) You must comply with any other guidance we give from time to time concerning use of social media.
- d) Be wary of any potential issues concerning information exchanged, such as defamation, breach of privacy and copyright, and comply with the law at all times.
- e) You must not identify or refer to any service users, ex-service users or prospects.
- f) Be yourself and do not use separate identities or pseudonyms online. If you are on a business related site such as a professional body or business forum, and you think it is appropriate, you may identify yourself with your job title and give the name of your employer. However, you are not speaking on PAC-UK's behalf and if necessary you should state that any views expressed are your own.
- g) Use common sense. Apply your judgment and exercise discretion. Respect your audience as you cannot know who is reading your posts. Do not make any derogatory personal comments or offensive remarks. Be mindful that anything you publish is instantly available worldwide and for a long time in the future. It cannot be retracted and you are personally responsible for it.
- h) Protect your own privacy and do not disclose any personal information.

7 Review

- 7.1 This policy will be reviewed annually to ensure it remains up to date and compliant with the law.