

Communications, Email and Internet Policy

1. Introduction

- 1.1 This Communications, Email, and Internet Policy applies to all employees, volunteers, contractors, and agents of Age UK Croydon who use the communications equipment, computers, devices, and systems provided by Age UK Croydon (“Users”).
- 1.2 Users are encouraged to use email and the internet at work as a fast and reliable method of communication with significant advantages for business.
- 1.3 In light of the fact that communications made by Users and their other activities online reflect upon Age UK Croydon and can create a number of commercial, professional, and legal problems, this Policy is intended to clarify what Age UK Croydon expects from Users and their responsibilities when using Age UK Croydon’s communications, email, and internet facilities (collectively, “Age UK Croydon’s Internet and Communication Facilities”).
- 1.4 Age UK Croydon’s Internet and Communication Facilities include:
 - 1.4.1 Telephone;
 - 1.4.2 Fax;
 - 1.4.3 Email;
 - 1.4.4 Internet;
 - 1.4.5 Website
- 1.5 Whilst Age UK Croydon’s Internet and Communications Facilities are made available to Users for the purposes of the business, a certain amount of limited personal use is permitted insofar as such personal use is consistent with this Policy and the duties of the User.
- 1.6 In addition to this Policy, when using Age UK Croydon’s Internet and Communications Facilities, Users must also comply with other Company Policies including Age UK Croydon’s Data Protection Policy, Equality and Diversity Policy, Harassment and Bullying Policy and Health and Safety Regulations as they relate to the use of display screen equipment

General Principles

There are certain general principles that should be borne in mind when using any type of communication, be it external or internal, including hard copy letters, memos, and notices. Age UK Croydon expects all Users to:

- 2.1 Use Age UK Croydon’s Internet and Communication Facilities, and non-electronic facilities including but not limited to Company letterheads and stationery, responsibly and professionally and at all times in accordance with their duties;

- 2.2 Be mindful of what constitutes confidential or restricted information and ensure that such information is never disseminated in the course of communications without express authority;
- 2.3 Be mindful of what constitutes personal data and ensure that personal data is never disseminated in the course of communications unless it is used in accordance with Age UK Croydon's Data Protection Policy and with express authority;
- 2.4 Ensure that they do not breach any copyright or other intellectual property right when making communications;
- 2.5 Ensure that they do not bind themselves or Age UK Croydon to any agreement without express authority to do so; and
- 2.6 Be mindful of the fact that any communication may be required to be relied upon in court, to the advantage or the detriment of the individual or Age UK Croydon, and to conduct their use of communication systems and equipment accordingly.
- 2.7 The viewing, transmission, downloading, uploading, or accessing in any way of any of the following material using Age UK Croydon's Internet and Communications Facilities will amount to gross misconduct with the possibility of summary dismissal:
 - 2.7.1 Material which is pornographic, sexist, racist, homophobic, or any other discriminatory or otherwise offensive material;
 - 2.7.2 Illegal or criminal material, including material which breaches copyright or any other intellectual property right;
 - 2.7.3 Any material which has the object or effect of causing harassment to the recipient;
 - 2.7.4 Material which the User knows, or reasonably ought to know, is confidential or restricted information and which they are not authorised to deal with.

2. **Internet Use**

- 3.1 Age UK Croydon provides access to the internet for the sole purpose of business and to assist Users in the performance of their duties. However, Age UK Croydon recognises that Users may need to use the internet for personal purposes and such use is permitted provided it is reasonable and does not interfere with the User's performance of their duties. Users may be asked to justify the amount of time they have spent on the internet or the sites they have visited.
- 3.2 Users must not use the internet to gain or attempt to gain unauthorised access to computer material or private databases, including restricted areas of Age UK Croydon's network. Nor must they intentionally or recklessly introduce any form of malware, spyware, virus, or other malicious software or code to the communications equipment or systems of Age UK Croydon.
- 3.3 Users must not access or attempt to access any information which they know or reasonably ought to know is confidential or restricted.
- 3.4 Users must not access or use personal data online in any manner that is inconsistent with Age UK Croydon's Data Protection Policy.
- 3.5 Users must not download or install any software without the express permission of the CEO.

3.6 In accordance with paragraph 2.7, Users must not attempt to download, view, or otherwise retrieve illegal, pornographic, sexist, racist, offensive, or any other material which is in any way in bad taste or immoral. Users should note that even material that is legal under UK law may nonetheless be in sufficiently bad taste to fall within this definition. As a general rule, if any person might be offended by any content, or if that material may be a source of embarrassment to Age UK Croydon or otherwise tarnish Age UK Croydon's image, viewing that material will constitute a breach of this Policy. Any such attempt will constitute a disciplinary offence and in addition to internet access being reviewed, reduced, or withdrawn, may be subject to disciplinary action or summary dismissal.

3. **Social Media Use**

4.1 Users may use social media for personal purposes occasionally during work hours provided that such usage complies with the provisions of Age UK Croydon's Social Media Policy and provided that it does not interfere with their work responsibilities or productivity.

4.2 Certain Users may from time to time be required to use social media on behalf of Age UK Croydon. Users should only do so with the authorisation of the Information Governance Lead, and in accordance with Age UK Croydon's Social Media Policy.

4.3 Age UK Croydon recognises that in their private lives Users may wish to publish content on the internet through a variety of means, including social media. Even outside of work Users must refrain from doing anything on social media or any other websites that defames, disparages, or otherwise brings into disrepute, Age UK Croydon, a User's Leadership team, a User's colleagues, or other related third parties. This includes, but is not limited to, making false or misleading statements and impersonating colleagues or third parties.

4.4 If a User makes any posting, contribution, or creation or publishes any other content which identifies or could identify the User as an employee, contractor, agent, or other member or associate of Age UK Croydon, or in which the User discusses their work or experiences relating to Age UK Croydon, the User must at all times ensure that their conduct is appropriate and consistent with their contract of employment and the corporate image of Age UK Croydon, and should bear in mind that the User owes a duty of fidelity to Age UK Croydon.

4.5 If a User is unsure as to the appropriateness of a posting or other content they wish to publish, they should speak to the Information Governance Lead at the earliest opportunity to seek clarification.

4.6 If, in any contribution or posting which identifies or could identify the User as an employee, agent, or other affiliate of Age UK Croydon, the User expresses an idea or opinion, they should include a disclaimer which clearly states that the opinion or idea expressed is that of the User and does not represent that of Age UK Croydon.

4. **Company Email Use**

5.1 The email address with which Users are provided by Age UK Croydon (ending in the suffix @ageukcroydon.org.uk) is provided for business purposes in

order to facilitate information sharing and timely communication with clients, colleagues, suppliers, funders, volunteers and other key stakeholders. Any Company business which is conducted via email must be conducted using Company email and is under no circumstances to be conducted through any other personal email address or account.

5.2 Users should adopt the following points as part of best practice:

5.2.1 Before communicating via email, Users should satisfy themselves that it is the most suitable mode of communication, particularly where time is of the essence;

5.2.2 Ensure that the email contains Age UK Croydon disclaimer notice. This should be added automatically by the email client. If it is not, Users should speak to our designated IT support (Qlic IT immediately);

5.2.3 All emails should contain the appropriate business reference(s), either in the subject line or in the body of the text;

5.2.4 Emails should be worded appropriately and in the same professional manner as if they were a letter;

5.2.5 Users should be careful not to copy an email automatically to everyone copied in to the original message to which they are responding as this may result in inappropriate or unlawful disclosure of confidential information and/or personal data;

5.2.6 Users should take care with the content of emails, in particular avoiding incorrect or improper statements and the unauthorised inclusion of confidential information or personal data. Failure to follow this point may lead to claims for discrimination, harassment, defamation, breach of contract, breach of confidentiality, or personal data breaches;

5.2.7 All emails should be proof read before transmission, which includes ensuring that any attachments referred to in the text are actually attached and are correct and the intended recipients' email addresses are correct;

5.2.8 If an important document is transmitted via email, the sender should telephone the recipient to confirm that the document has been received in full;

5.2.9 All emails received relating to complaints or safeguarding issues should be copied to the appropriate folder on the shared drive;

5.2.10 No email relating to complaints or safeguarding issues should be deleted unless a copy has been made in the appropriate folder on the shared drive.

5.3 Users must not email any business document to their own or a colleague's personal web-based email accounts without authorisation from their line manager.

5.4 Users may use Company email for personal purposes, provided that such use is kept to a minimum and does not interfere with the performance of the User's duties. In any case Users are not permitted to use their Company email address to subscribe to any newsletters or to receive any marketing, as this will result in extra unnecessary burden being placed upon Age UK Croydon's communications systems. All personal emails should be labelled "personal" in the subject line.

5.5 If Users do use Company email for personal reasons, they will be deemed to agree to the possibility that any emails sent or received may be subject to monitoring in accordance with Part 10 of this Policy.

5.6 Users must not send abusive, obscene, discriminatory, racist, harassing, derogatory, pornographic, or otherwise inappropriate material in emails. If any User feels that they have been or are being harassed or bullied, or if they are offended by material received in an email from another User, they should inform the HR & Compliance Director.

5.7 Users should at all times remember that email messages may have to be disclosed as evidence for any court proceedings or investigations by regulatory bodies and may therefore be prejudicial to both their and Age UK Croydon's interests. Users should remember that data which appears to have been deleted is often recoverable. If secure deletion is required, for example, where an email contains confidential information or personal data, Users should follow the steps set out in Age UK Croydon's Data Retention Policy.

5.8 Attachments are the mechanism whereby viruses are usually passed between computers. Attachments must not be opened if there is any uncertainty as to the sender.

5. **Personal Email Use**

Users are permitted to access and use their personal email accounts only to the extent that such use is reasonable and does not interfere with the User's performance of their duties.

6. **Company Telephone System Use**

7.1 Age UK Croydon's telephone lines and mobile phones issued by Age UK Croydon are for the exclusive use by Users working on Age UK Croydon's business. Essential personal telephone calls regarding Users' domestic arrangements are acceptable, but excessive use of Age UK Croydon's telephone system and/or mobile phones for personal calls is prohibited. Any personal telephone calls should be timed to cause minimal disruption to Users' work.

7.2 Users should be aware that telephone calls made and received on Age UK Croydon's telephone lines and mobile phones issued by Age UK Croydon may be routinely monitored to ensure customer satisfaction or to check the telephone system is not being abused.

7.3 If Age UK Croydon discovers that the telephone system or a mobile phone issued by Age UK Croydon has been used excessively for personal calls, this will be treated as a disciplinary matter and will be handled in accordance with Age UK Croydon's disciplinary procedures.

7. **Security**

8.1 The integrity of Age UK Croydon's business relies on the security of Age UK Croydon's Internet and Communications Facilities. Users bear the responsibility of preserving the security of Company's Internet and Communications Facilities through careful and cautious use. In addition to the general provisions contained in this Policy, Users must also comply with Age UK Croydon's Data Protection Policy.

- 8.2 Users must not download or install any software or program without the express permission of the CEO, and are reminded of paragraphs 3.2 and 3.5 of this Policy.
- 8.3 Users must not delete, destroy, or otherwise modify any part of Age UK Croydon's Internet and Communications Facilities (including, but not limited to, hardware and software) without the express permission of the CEO.
- 8.4 Users must not share any password that they use for accessing Age UK Croydon's Internet and Communications Facilities with any person, other than when it is necessary by for maintenance or repairs by Qlic IT or AUKC Operatrions dept. Where it has been necessary to share a password, the User should change the password immediately when it is no longer required by Qlic IT. Users are reminded that it is good practice to fulfil the requirements of a strong password and 6 digit PIN for mobile phones.
- 8.5 Users must ensure that confidential information, personal data, and other sensitive information is kept secure. The security of personal data in particular is governed by Age UK Croydon's Data Protection Policy, which Users must comply with at all times when handling personal data. Workstations and screens should be locked when the User is away from the machine and hard copy files and documents should be secured when not in use.
- 8.6 If a User has been issued with a laptop, tablet, smartphone, or other mobile device, that device should be kept secure at all times, particularly when travelling. Mobile devices must be password-protected with a 6 digit pin and, where more secure methods are available, such as fingerprint recognition, such methods must be used. Confidential information, personal data, and other sensitive information stored and/or accessed on a mobile device should be kept to the minimum necessary for the User to perform their duties. Users should also be aware that when using mobile devices outside of the workplace, information displayed on them may be read by unauthorised third parties, for example, in public places and on public transport.
- 8.7 Users using Company-issued mobile devices (as outlined above in paragraph 9.7) must not connect such devices to public wi-fi networks, for example, in cafes, restaurants, and on public transport. All mobile devices are supported by Lookout Cyber attack malware.
- 8.8 When opening email from external sources Users must exercise caution in light of the risk malware, spyware, viruses, and other malicious software or code pose to system security. Users should always ensure that they know what an attachment is before opening it. If a User suspects that their computer has been affected by a virus they must call Qlic IT immediately and notify your line manager , and HR & Governance Lead.
- 8.9 Hand-held mobile phones must not be used while driving. It is illegal to do so and any user found to be doing so, even if not caught by police action, will be subject to disciplinary action by AUKC; users will not use mobile phones, either hand-held or hands-free whilst any vehicle is under their control and they are doing work for the organisation. in Workers should switch their phones off when driving and use the call divert and messaging services. They may stop regularly, park up safely, turn off the engine and then retrieve messages and make calls.

8. **Monitoring**

9.1 To the extent permitted or required by law, Age UK Croydon may monitor Users' use of Age UK Croydon's Internet and Communications Facilities for its legitimate business purposes which include (but are not necessarily limited to) the following reasons:

9.1.1 To ensure Company policies and guidelines are followed, and standards of service are maintained;

9.1.2 To comply with any legal obligation;

9.1.3 To investigate and prevent the unauthorised use of Age UK Croydon's Internet and Communications Facilities and maintain security;

9.1.4 If Age UK Croydon suspects that a User has been viewing or sending offensive or illegal material (or material that is otherwise in violation of this Policy);

9.1.5 If Age UK Croydon suspects that a User has been spending an excessive amount of time using Age UK Croydon's Internet and Communications Facilities for personal purposes.

9.2 Users should be aware that all internet and email traffic data sent and received using Age UK Croydon's Internet and Communications Facilities is logged, including websites visited, times of visits, and duration of visits. Any personal use of the internet will necessarily therefore be logged also. Users who wish to avoid the possibility of Age UK Croydon becoming aware of any political or religious beliefs or affiliations should avoid visiting websites at work which might reveal such affiliations. By using Age UK Croydon's Internet and Communications Facilities for personal use, Users are taken to consent to personal communications being logged and monitored by Age UK Croydon. Age UK Croydon shall ensure that any monitoring of Users' use of Age UK Croydon's Internet and Communications Facilities complies with all relevant legislation including, but not limited to, the GDPR (EU Regulation 2016/679 General Data Protection Regulation) and the Human Rights Act 1998.

9.3 When monitoring emails, Age UK Croydon will normally restrict itself to looking at the address and heading of the emails. However, if it is considered necessary, Age UK Croydon may open and read emails. Users should be aware that sensitive and confidential communications should not be sent by email because it cannot be guaranteed to be private. Users are reminded that any permitted personal emails should be marked as "personal" in the subject line.

9. **Recruitment**

Age UK Croydon may use internet searches to carry out due diligence as part of its recruitment process. In these circumstances, Age UK Croydon will act in accordance with its equal opportunities and data protection obligations.

10. **Misuse and Compliance**

11.1 Any User found to be misusing Age UK Croydon's Internet and Communications Facilities will be treated in line with Age UK Croydon's Disciplinary Policy and Procedure. Misuse of the internet can, in some cases, amount to a criminal offence.

11.2 Where any evidence of misuse of Age UK Croydon’s Internet and Communications Facilities is found, Age UK Croydon may undertake an investigation into the misuse in accordance with Age UK Croydon’s Disciplinary Policy and Procedure. If criminal activity is suspected or found, Age UK Croydon may hand over relevant information to the police in connection with a criminal investigation.

AGE UK CROYDON is a registered charity no. 1081013 and a registered company no. 3921436. AGE UK CROYDON TRADING LIMITED, registered company no. 5792724 is a wholly owned subsidiary of AGE UK CROYDON. All Policies and Procedures apply to both companies.

AGE UK CROYDON is an equal opportunities employer and any discrimination or harassment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation will not be tolerated.

Date this policy came into effect, approved by the Board of	Name: Rosaleen Liard Signature: <i>R.Liard</i> Date: 05.05.2022
Next Review as agreed by the SMT	
Name or position of person responsible for this policy	Name: Rosaleen Liard Signature: <i>R.Liard</i> Position: Director of HR and Governance
Law relating to this document	