

COMMUNICATION TOOLS POLICY

(Replaces E-mail and Internet Usage Policy)

Issue No 2 (Updated June 2014 to Group Policy)

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<u>Introduction</u>

Ore Valley Housing Association is the parent company of the Ore Valley Group, which has 3 subsidiary companies, namely Ore Valley Enterprises, Fife HARCA and Cardenden Heat and Power (CHAP). This policy refers to the staff of Ore Valley Housing Association, but includes individuals who in process of their work are linked with the Association or the Ore Valley Group.

The introduction of e-mail, internet and social media platforms has greatly facilitated internal as well as external communication throughout the world. Unfortunately, these communication tools also have the potential for misuse. The term 'communication tools' will be used throughout this policy to refer to email, internet and social media platforms.

This policy sets out the standards expected of staff and others of the Ore Valley Group, including employees, workers, governing body, stakeholders, consultants and agency staff when using communication tools, for business and/or for personal use, and the consequences for the expression of views that contradict, oppose or infringe on the purpose, ethos or principles of the Ore Valley Group.

This policy should be referred to in conjunction with the policies and procedures below:

- Removing Access Right Procedure
- Staff Training Policy
- Staff Appraisal Process
- Staff Induction Policy
- Openness and Confidentiality Policy
- Equal Opportunities Policy
- Whistleblowing Policy
- Communications Strategy
- Data Protection and Information Security Policy
- Dignity at Work Policy
- Social Media Policy (To be developed)

Principles

- This policy applies to all employees, volunteers, workers, governing body members, stakeholders, consultants and agency staff of the Ore Valley Group and refers to communication tools within the Ore Valley Group.
- Individual departments and administrative units may define additional "conditions of use" for communication tools under their supervision. Any such additional conditions must be consistent with this overall policy but may include more detailed guidelines and, where necessary and appropriate, additional restrictions.
- Any person who uses Ore Valley HA communication tools for work of the Ore Valley Group, consents to all of the provisions of this policy and agrees to comply with all of its terms and conditions and with all applicable laws and regulations.
- Any user of the communication tools whose actions violate this policy or any other Ore Valley HA or Group policy or regulation, may be subject to limitations or elimination of any

- communication tool privileges in addition to disciplinary action in accordance with Ore Valley HA's disciplinary procedures.
- The policy aims to ensure that use of communication tools among Ore Valley HA users is consistent with its own internal policies, all applicable legislation, and the individual user's job responsibilities.
- The policy also aims to establish basic guidelines for appropriate use of the communication tools.

Access

It is the Ore Valley Group's intent as far as possible to provide basic, network-connected communication tools for the use of staff and Board members. It is also Ore Valley Group's intent to provide a communications link between its own e-mail system and the mail systems that operate on the national and international data networks.

The primary purpose of such access is to encourage greater business efficiency and to enhance knowledge, learning and communication opportunities for the organisation as a whole and its people as individuals.

Occasional and incidental social communications using any communication tools are not disallowed by this policy and are permitted so long as this does not interfere with employees' performance of their expected duties. However, each user should comply with the specific policies of their individual unit/section/department.

As a general principle access to communication tools via Ore Valley HA's resources will not be available outwith office hours except where prior permission has been sought and granted.

Proper Use

Communication tools are very informal mediums. They are closer to speech than more formal written communications, yet there is a permanent written record. It typically lacks the care given to written communication, and can often be stilted, abbreviated, conversational language, with heavy use of emoticons. In addition, it is often the case that people "say" things in e-mail and on-line (via social media platforms) that they might not otherwise feel comfortable communicating to others face to face.

A combination of such informalities has the potential to create dangerous situations such as:

- sending e-mails or posting comments on social media platforms containing negligent misstatements or binding the organisation in other ways
- harassment of colleagues or others (e-mail and social media networks are common in workplace harassment cases and under existing anti-discrimination legislation, an employer can be liable for acts of their employees, whether or not done with the employer's knowledge or approval)

The following is a guide to Ore Valley HA's standards and is not exhaustive:

- local rules will make clear the extent to which personal use is allowed.
- confidential information should not be transmitted by communication tools unless it is encrypted or password protected.
- external e-mail messages should have appropriate signature files and disclaimers attached.
- users should be familiar with general housekeeping good practice (e.g. the need to delete messages regularly).

- users should use appropriate etiquette when writing using communication tools. The use of capital letters, for example, is considered to be the equivalent of SHOUTING
- inappropriate messages (including on social media platforms) are prohibited including those which contradict, oppose or infringe on the purpose, ethos or principles of Ore Valley HA.
- if a member of staff is in receipt of such messages they should raise any concerns with their line manager immediately.
- staff also have the right to raise a grievance should they receive offensive communication messages from a fellow employee.
- if there is concern over a colleagues general conduct using communication tools this must be raised immediately with their line manager.
- users should not send potentially defamatory communication messages which criticise other individuals or organisations.
- users should not access or download inappropriate material, such as pornography, from communication tools.
- users should take care not to infringe copyright when downloading material or forwarding it to others.

Social Media Platforms

Both Ore Valley HA and the Ore Valley Group respect the right to a private life and that includes joining any social media platforms employees wish. However, be aware of the privacy levels of information posted on such sites. Employees and other individuals linked with the Ore Valley Group's activities are therefore not allowed to disclose confidential information relating to the Group or Ore Valley HA, its customers, partners, suppliers, board members, employees, or stakeholders on any social networking platforms. It is also prohibited to post any comments on people and events connected to the Group or Ore Valley HA, or make any remarks which could potentially bring Ore Valley HA into disrepute. Any such actions could result in disciplinary action, including dismissal.

If using social media platforms employees are expected to adhere to the following;

- keep profiles set to private and protect tweets.
- ensure all passwords are kept private.
- we do not prohibit employees from listing Ore Valley HA as their employer however we do advise against it.
- employees should be aware of the language and content of their posts in particular where employees have an association with their employer e.g. listing their employer or linked with colleagues.

Policy Breaches

As mentioned earlier, Ore Valley HA on behalf of the Group, provides tools to support its communication, learning and service activities and associated administrative functions. Any use of these facilities that interferes with Ore Valley HA's or the Group's activities and functions or does not respect the image and reputation of Ore Valley HA or the Group will be regarded as breaching this policy.

Any line manager concerned about an employee's breach of this policy, e.g. excessive use of electronic mail for personal use or spending large quantities of time on social media, should not unilaterally seek to gain access to a user's electronic communications. Instead, the manager should:

- review whether or not expectations and standards in this area have been well communicated and made clear to the user.
- pursue direct communication with the user regarding the issue.
- proceed as one would handle any disciplinary action using the appropriate procedures.

The following are some examples of breaches of this policy and is not exhaustive:

- concealment or misrepresentation of names or affiliations in e-mail messages.
- alteration of source or destination addresses of e-mail.
- use of communication tools for commercial or private business purposes, within formal core hours.
- use of communication tools, in a way that unreasonably interferes with or threatens other individuals.
- use of communication tools that degrades or demeans other individuals whether Ore Valley HA employees or others.
- any form of commercial use using communication tools is prohibited.
- the purchase or sale of personal items through advertising on the internet, within formal core hours.
- the use of communication tools to harass employees, vendors, customers, and others.
- the use of communication tools for political purposes.
- the release of untrue, distorted, or confidential information regarding Ore Valley HA business via communication tools.
- viewing/downloading purely entertainment sites or material within formal core hours, where there is no benefit to Ore Valley HA in terms of its learning, communication or service aims described earlier.

Some generic terms for much of the above are as follows and are expressly prohibited under this policy:

Spamming

Spam is broadly defined as unsolicited, e-mail sent to a large number of recipients, and its content is not related to the business activities of Ore Valley HA or the Ore Valley Group. Ore Valley HA's e-mail accounts or any other account linked with the Ore Valley Group are not allowed to be used for the purpose of sending SPAM messages. Not only is this a misuse of resources, but it can also result in external sites "blacklisting" Ore Valley HA, prohibiting delivery of any future e-mails to our location.

Chain letters and Pyramid Schemes

These e-mail messages are sent to a specific number of people, usually professing a "get rich quick" scheme. The recipients are then asked to forward the message on to the same number of people. These types of messages are illegal and not allowed in within Ore Valley HA or the Ore valley Group. Accounts found associated with chain letters or pyramid schemes may be turned off without warning.

Spoofing

Spoofing refers to someone sending any mail that "appears" to be from someone else. This is the same as forging someone else's identity.

Harassment

Harassment (cyber bullying) via any communication tool as specified in the Ore Valley Group's Equality & Diversity Policy, as with other avenues of communication, is prohibited.

Privacy

Authors or parties to communication messages should be the primary sources of authorisation in granting access to their information or files. Third party access to email ordinarily may only be accomplished through either the sender or the recipient(s) of that mail.

Since Association resources are being used to create and store files, users should understand that the Association must assign certain individuals responsibility for maintaining, repairing, and further developing those resources.

In the normal course of doing their assigned work assigned individuals, by virtue of their positions within the Association and their specific responsibilities, will have special access privileges to hardware and software and therefore to the content that resides in those resources. The Association will strive to protect individual privacy by ensuring that the number of individuals with this level of access is strictly limited and that such individuals are selected for their judgment and ethics, as well as their technical expertise.

Within the Association the individuals who will hold this responsibility will be CEO, Communications Officer and Business Development Manager.

Certain staff due to the specific responsibilities of their role require access to individuals hardware and software within Ore Valley HA and personal files or resources contained within them.

It is important that all users are aware that there is the possibility that security levels can and do vary when a message is sent. This can result in messages being visible to others other than the intended recipient.

Ore Valley HA will inform all users of the backup system in use and how this affects the retrieval of any data on Ore Valley HA's systems.

Ore Valley HA will not monitor the contents of messages as a routine procedure. However, Ore Valley HA does reserve the right to inspect, copy, store, and disclose the contents of electronic messages at any time. However, it will do so only when it believes it is appropriate to prevent or correct improper use, satisfy a legal obligation, or ensure proper operation of the electronic mail facilities. If it is necessary to obtain access the appropriate approval will be sought first from the CEO.

Security

Security of Ore Valley Group's information and systems including protection from viruses through communication tools is a serious concern for the Group and Association. As a result all users must keep personal log-ins and passwords confidential and change passwords on a regular basis as instructed within the IT Security procedures. Failure to adhere to this policy jeopardises network security and puts users at risk of potential misuse of the system by other individuals. Network users may be held responsible for all actions taken using their personal network access permissions.

In a further effort to ensure the security of our systems and the information within it, Ore Valley HA has local rules, which govern the downloading, and uploading of files. Virus detection software is installed on the server, individual workstations and the network. However, users are responsible for virus checking any downloaded files.

This policy will be updated as appropriate. If any individual requires further clarification	with
anything contained in this policy they must speak to their line manager.	

General Data Protection Regulations

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own Data Protection and Confidentiality Policy. Information regarding how your data will be used and the basis for processing your data is provided in The Ore Valley Group's employee privacy notice.