



# ICT Policy

<b>Date</b>	<b>13<sup>th</sup> March 2017</b>
<b>Reviewed</b>	<b>22<sup>nd</sup> June 2020</b>
<b>Date of next review</b>	<b>July 2021</b>

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## Internet use policy

### Context and overview

#### Introduction

Autism Bedfordshire makes internet access available to its employees where relevant and useful for their jobs.

This internet use policy describes the rules governing internet use at Autism Bedfordshire. It also sets out how staff members are expected to behave when using the internet.

This policy should be read alongside other key policies. Autism Bedfordshire’s data protection and email policies are particularly relevant to staff who use the internet.

#### Why this policy exists

The internet is a powerful tool that can bring significant benefits to Autism Bedfordshire.

However, it’s important every person at Autism Bedfordshire who uses the internet understands how to use it responsibly, safely and legally.

This internet use policy:

- reduces the **online security risks** faced by Autism Bedfordshire;
- lets staff know what they **can and can’t do** online;
- ensures employees **do not view inappropriate content** at work;
- helps Autism Bedfordshire **satisfy its legal obligations** regarding internet use.

#### Policy scope

This policy applies to all staff, contractors and volunteers at Autism Bedfordshire who use Autism Bedfordshire’s internet on work time.

It applies no matter whether that internet access takes place on company premises, while travelling for business or while working from home.

It applies to use of the internet on any device that is owned by Autism Bedfordshire, or that is connected to any company networks or systems.

For example, it applies both to an employee using the internet at their desk, and to employees who connect their own tablets or smart phones to Autism Bedfordshire wireless network.

## General internet guidelines

### Internet use is encouraged

Autism Bedfordshire recognises that the internet is an integral part of doing business. It therefore encourages its employees to use the internet whenever such use supports Autism Bedfordshire's goals and objectives.

For instance, staff members may use the internet to:

- purchase office supplies;
- book business travel;
- perform competitor or market research;
- identify potential suppliers or partners.

There are many valid reasons for using the internet at work and Autism Bedfordshire certainly allows its employees to explore and take advantage of the internet's many advantages.

### Personal internet use

Autism Bedfordshire also recognises that the internet is embedded in many people's daily lives. As such, it allows employees to use the internet for personal reasons, with the following stipulations:

- personal internet use should be of a reasonable level and restricted to non-work times, such as breaks and during lunch;
- all rules described in this policy apply equally to personal internet use, e.g. inappropriate content is always inappropriate, no matter whether it is being accessed for business or personal reasons;
- personal internet use must not affect the internet service available to other people in Autism Bedfordshire, e.g. downloading large files could slow access for other employees.

### Authorised users

Only people who have been authorised to use the internet at Autism Bedfordshire may do so.

Authorisation is usually provided by an employee's line manager or Autism Bedfordshire IT department. It is typically granted when a new employee joins Autism Bedfordshire and is assigned their login details for Autism Bedfordshire IT systems.

Unauthorised use of Autism Bedfordshire's internet connection is prohibited.

Employees who use the internet without authorisation — or who provide access to unauthorised people — may have disciplinary action taken against them.

## Key areas

### Internet security

Used unwisely, the internet can be a source of security problems that can do significant damage to Autism Bedfordshire's data and reputation.

- Users must not knowingly introduce any form of computer virus, Trojan, spyware or other malware into Autism Bedfordshire.
- Employees must not gain access to websites or systems for which they do not have authorisation, either within the business or outside it.
- Company data should only be uploaded to and shared via approved services. The IT department can advise on appropriate tools for sending and sharing large amounts of data.
- Employees must not steal, use, or disclose someone else's login or password without authorisation.

Staff members must always consider the security of Autism Bedfordshire's systems and data when using the internet. If required, help and guidance is available from line managers and Autism Bedfordshire IT department.

### Inappropriate content and uses

There are many sources of inappropriate content and materials available online. It is important for employees to understand that viewing or distributing inappropriate content is not acceptable under any circumstances.

Users must not:

- take part in any activities on the internet that could bring Autism Bedfordshire into disrepute;
- create or transmit material that might be defamatory or incur liability for Autism Bedfordshire;
- view, download, create or distribute any inappropriate content or material\*;

\*Note - Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs. This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

- Use the internet for any illegal or criminal activities.
- Send offensive or harassing material to others.
- Broadcast unsolicited personal views on social, political, religious or other non-business related matters.

- Send or post messages or material that could damage Autism Bedfordshire image or reputation.

### Copyright

Autism Bedfordshire respects and operates within copyright laws. Users may not use the internet to:

- publish or share any copyrighted software, media or materials owned by third parties, unless permitted by that third party;
- download illegal copies of music, films, games or other software, whether via file sharing services or other technologies.

Employees must not use Autism Bedfordshire's equipment, software or internet connection to perform any tasks which may involve breach of copyright law.

### Policy enforcement

#### Monitoring internet use

Company IT and internet resources — including computers, smart phones and internet connections — are provided for legitimate business use.

Autism Bedfordshire therefore reserves the right to monitor use of the internet, to examine systems and review the data stored in those systems.

Any such examinations or monitoring will only be carried out by authorised staff.

Additionally, all internet data written, sent or received through Autism Bedfordshire's computer systems is part of official Autism Bedfordshire records. Autism Bedfordshire can be legally compelled to show that information to law enforcement agencies or other parties.

Users should always ensure that the business information sent over or uploaded to the internet is accurate, appropriate, ethical, and legal.

#### Potential sanctions

Knowingly breaching this internet use policy is a serious matter. Users who do so will be subject to disciplinary action, up to and including termination of employment.

Employees, contractors and other users may also be held personally liable for violating this policy.

Where appropriate, Autism Bedfordshire will involve the police or other law enforcement agencies in relation to breaches of this policy.



# Email use policy

## Context and overview

### Introduction

Autism Bedfordshire makes email available to its employees where relevant and useful for their jobs.

This email use policy describes the rules governing email use at Autism Bedfordshire. It also sets out how staff members are expected to behave when using email.

This policy should be read alongside other key policies. In particular, users should also read Autism Bedfordshire's data protection and internet use policies.

### Why this policy exists

Email is a standard way to communicate in business. It's used widely and is arguably just as important as the telephone.

Like any technology, email can cause difficulties if used incorrectly or inappropriately. This email policy:

- reduces the **security and business risks** faced by Autism Bedfordshire;
- lets staff know **how they are permitted to use company email**;
- ensures employees follow **good email etiquette**;
- helps Autism Bedfordshire **satisfy its legal obligations** regarding email use.

### Policy scope

This policy applies to all staff, contractors and volunteers at Autism Bedfordshire who use Autism Bedfordshire email system.

It applies no matter where that email use takes place: on company premises, while travelling for business or while working from home.

It applies to use of company email on any device, no matter whether owned by Autism Bedfordshire or employee.

### General email guidelines

#### Business email use

Autism Bedfordshire recognises that email is a key communication tool. It encourages its employees to use email whenever appropriate.

For instance, staff members may use email to:

- communicate with customers or suppliers;
- market Autism Bedfordshire's products;
- distribute information to colleagues.

### Personal use of email

Autism Bedfordshire also recognises that email is an important tool in many people's daily lives. As such, it allows employees to use their company email account for personal reasons, with the following stipulations:

- personal email use should be of a reasonable level and restricted to non-work times, such as breaks and during lunch;
- all rules described in this policy apply equally to personal email use, e.g. inappropriate content is always inappropriate, no matter whether it is being sent or received for business or personal reasons;
- personal email use must not affect the email service available to other users, e.g. sending exceptionally large files by email could slow access for other employees;
- users may access their own personal email accounts at work, if they can do so via our internet connection, e.g. a staff member may check their Yahoo or Google Mail during their lunch break.

### Authorised users

Only people who have been authorised to use email at Autism Bedfordshire may do so.

Authorisation is usually provided by an employee's line manager or the Autism Bedfordshire IT manager. It is typically granted when a new employee joins Autism Bedfordshire and is assigned their login details for Autism Bedfordshire IT systems.

Unauthorised use of Autism Bedfordshire's email system is prohibited.

Employees who use company email without authorisation — or who provide access to unauthorised people — may have disciplinary action taken against them.

## Key areas

### Email security

Used inappropriately, email can be a source of security problems. Users of Autism Bedfordshire's email system must not:

- open email attachments from unknown sources, in case they contain a virus, Trojan, spyware or other malware;
- disable security or email scanning software - these tools are essential to protect the business from security problems;
- send confidential company data via email - the IT manager can advise on appropriate tools to use instead;
- access another user's company email account - if they require access to a specific message (for instance, while an employee is off sick), they should approach their line manager or the IT manager.

Staff members must always consider the security of Autism Bedfordshire's systems and data when using email. If required, help and guidance is available from line managers and Autism Bedfordshire IT department.

Users should note that email is not inherently secure. Most emails transmitted over the internet are sent in plain text. This means they are vulnerable to interception.

Although such interceptions are rare, it's best to regard email as an open communication system, not suitable for confidential messages and information.

### Inappropriate email content and use

Autism Bedfordshire email system must not be used to send or store inappropriate content or materials.

It is important employees understand that viewing or distributing inappropriate content via email is not acceptable under any circumstances.

Users must not:

- write or send emails that might be defamatory or incur liability for Autism Bedfordshire;
- create or distribute any inappropriate content or material via email\*.

\*Note - Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs. This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

- use email for any illegal or criminal activities;

- send offensive or harassing emails to others;
- send messages or material that could damage Autism Bedfordshire's image or reputation.

Any user who receives an email they consider to be inappropriate should report this to their line manager or supervisor.

### Copyright

Autism Bedfordshire respects and operates within copyright laws. Users may not use company email to share any copyrighted software, media or materials owned by third parties, unless permitted by that third party.

Employees must not use Autism Bedfordshire's email system to perform any tasks that may involve breach of copyright law.

Users should keep in mind that the copyright on letters, files and other documents attached to emails may be owned by the email sender, or by a third party. Forwarding such emails on to other people may breach this copyright.

### Contracts and liability

Users must be careful about making commitments or agreeing to purchases via email.

An email message may form a legally-binding contract between [company name] and the recipient — even if the user has not obtained proper authorisation within Autism Bedfordshire.

### Email disclaimer

The standard email template includes an email disclaimer. Users must not remove or change this when they send messages.

### Email marketing and bulk email

Autism Bedfordshire may use email to market to existing and potential customers.

There is significant legislation covering bulk email and use of email for marketing.

All email campaigns must be authorised by the marketing manager and implemented using Autism Bedfordshire's email marketing tool.

Users must not send bulk emails using the standard business email system.

All questions about email marketing should be directed to the marketing manager.

## Email best practice

### Email etiquette

Email is often used to communicate with customers, partners and other important contacts. Although a relatively informal medium, staff should be aware that each email they send does affect Autism Bedfordshire's image and reputation.

It's a good idea to follow rules of good email etiquette. Users must:

- not forward on chain emails or 'humorous' messages. These clog up people's in-boxes and some topics are not appropriate for the workplace;
- always use a meaningful subject line rather than leaving it blank or using a single word like 'hello';
- only use the 'important message' setting sparingly, for messages that really are important;
- never ask recipients to send a 'message read' receipt. Many people find these annoying and not all email services support them;
- not use ALL CAPITAL LETTERS in messages or subject lines. This can be perceived as impolite;
- be sparing with group messages, only adding recipients who will find the message genuinely relevant and useful;
- use the 'CC' (carbon copy) field sparingly. If someone really needs to receive a message, they should be included in the 'to' field;
- use the 'BCC' (blind carbon copy) field to send group messages where appropriate. It stops an email recipient seeing who else was on the email.

### Internal email

Email is a valid way to communicate with colleagues. However, it tends to be overused for internal communication.

Users should keep these points in mind when emailing colleagues:

- would the issue be better addressed via a face-to-face discussion or telephone call?;
- is email the best way to send a document out for discussion? Often, it becomes very hard to keep track of feedback and versions;
- it's rarely necessary to 'reply all'. Usually, it's better to reply and then manually add other people who need to see a message.

## Policy enforcement

### Monitoring email use

Autism Bedfordshire email system and software are provided for legitimate business use.

Autism Bedfordshire therefore reserves the right to monitor employee use of email.

Any such examinations or monitoring will only be carried out by authorised staff.

Additionally, all emails sent or received through Autism Bedfordshire's email system are part of official Autism Bedfordshire records. Autism Bedfordshire can be legally compelled to show that information to law enforcement agencies or other parties.

Users should always ensure that the business information sent via email is accurate, appropriate, ethical, and legal.

### Potential sanctions

Knowingly breaching this email use policy is a serious matter. Users who do so will be subject to disciplinary action, up to and including termination of employment.

Employees, contractors and other users may also be held personally liable for violating this policy.

Where appropriate, Autism Bedfordshire will involve the police or other law enforcement agencies in relation to breaches of this policy.

However, Autism Bedfordshire is unlikely to take formal action if a user fails to adhere to the guidelines in the 'email best practice' section.

## Social media policy

### Context and overview

#### Introduction

Employees of Autism Bedfordshire may be able to access social media services and social networking websites at work, either through company IT systems or via their own personal equipment.

This social media policy describes the rules governing use of social media at Autism Bedfordshire.

It sets out how staff must behave when using Autism Bedfordshire's social media accounts. It also explains the rules about using personal social media accounts at work and describes what staff may say about Autism Bedfordshire on their personal accounts.

This policy should be read alongside other key policies. Autism Bedfordshire's internet use policy is particularly relevant to staff using social media.

### Why this policy exists

Social media can bring significant benefits to Autism Bedfordshire, particularly for building relationships with current and potential customers.

However, it's important that employees who use social media within Autism Bedfordshire do so in a way that enhances Autism Bedfordshire's prospects.

A misjudged status update can generate complaints or damage Autism Bedfordshire's reputation. There are also security and data protection issues to consider.

This policy explains how employees can use social media safely and effectively.

### Policy scope

This policy applies to all staff, contractors and volunteers at Autism Bedfordshire who use social media while working — no matter whether for business or personal reasons.

It applies no matter whether that social media use takes place on company premises, while travelling for business or while working from home.

Social media sites and services include (but are not limited to):

- popular social networks like **Twitter** and **Facebook**;
- online review websites like **Reevoo** and **Trustpilot**;
- sharing and discussion sites like **Delicious** and **Reddit**;
- photographic social networks like **Flickr** and **Instagram**;
- question and answer social networks like **Quora** and **Yahoo Answers**;
- professional social networks like **LinkedIn** and **Sunzu**.

### Responsibilities

Everyone who operates a company social media account or who uses their personal social media accounts at work has some responsibility for implementing this policy.

However, these people have key responsibilities:

- the **Social Media Manager** is ultimately responsible for ensuring that Autism Bedfordshire uses social media safely, appropriately and in line with Autism Bedfordshire's objectives;
- the **IT Manager** is responsible for providing apps and tools to manage Autism Bedfordshire's social media presence and track any key performance indicators - they are also responsible for proactively monitoring for social media security threats;
- the **Marketing Manager** is responsible for working with the Social Media Manager to roll out marketing ideas and campaigns through our social media channels;

- the **Customer Service Manager** is responsible for ensuring requests for assistance and support made via social media are followed up.

## General social media guidelines

### The power of social media

Autism Bedfordshire recognises that social media offers a platform for Autism Bedfordshire to perform marketing, stay connected with customers and build its profile online.

Autism Bedfordshire also believes its staff should be involved in industry conversations on social networks. Social media is an excellent way for employees to make useful connections, share ideas and shape discussions.

Autism Bedfordshire therefore encourages employees to use social media to support Autism Bedfordshire's goals and objectives.

### Basic advice

Regardless of which social networks employees are using, or whether they're using business or personal accounts on company time, following these simple rules helps avoid the most common pitfalls.

- **Know the social network.** Employees should spend time becoming familiar with the social network before contributing. It's important to read any FAQs and understand what is and is not acceptable on a network before posting messages or updates.
- **If unsure, don't post it.** Staff should err on the side of caution when posting to social networks. If an employee feels an update or message might cause complaints or offence — or be otherwise unsuitable — they should not post it. Staff members can always consult the [social media manager] for advice.
- **Be thoughtful and polite.** Many social media users have got into trouble simply by failing to observe basic good manners online. Employees should adopt the same level of courtesy used when communicating via email.
- **Look out for security threats.** Staff members should be on guard for social engineering and phishing attempts. Social networks are also used to distribute spam and malware. Further details below.
- **Keep personal use reasonable.** Although Autism Bedfordshire believes that having employees who are active on social media can be valuable both to those employees and to the business, staff should exercise restraint in how much personal use of social media they make during working hours.
- **Don't make promises without checking.** Some social networks are very public, so employees should not make any commitments or promises on behalf of Autism Bedfordshire without checking that we can deliver on the promises. Direct any enquiries to the [social media manager].



- **Handle complex queries via other channels.** Social networks are not a good place to resolve complicated enquiries and customer issues. Once a customer has made contact, employees should handle further communications via the most appropriate channel — usually email or telephone.
- **Don't escalate things.** It's easy to post a quick response to a contentious status update and then regret it. Employees should always take the time to think before responding, and hold back if they are in any doubt at all.

### Use of company social media accounts

This part of the social media policy covers all use of social media accounts owned and run by Autism Bedfordshire.

#### Authorised users

Only people who have been authorised to use Autism Bedfordshire's social networking accounts may do so.

Authorisation is usually provided by the **Social Media Manager**. It is typically granted when social media-related tasks form a core part of an employee's job.

Allowing only designated people to use the accounts ensures Autism Bedfordshire's social media presence is consistent and cohesive.

#### Creating social media accounts

New social media accounts in Autism Bedfordshire's name must not be created unless approved by the **Social Media Manager**.

Autism Bedfordshire operates its social media presence in line with a strategy that focuses on the most-appropriate social networks, given available resources.

If there is a case to be made for opening a new account, employees should raise this with the **Social Media Manager**.

#### Purpose of company social media accounts

Autism Bedfordshire's social media accounts may be used for many different purposes.

In general, employees should only post updates, messages or otherwise use these accounts when that use is clearly in line with Autism Bedfordshire's overall objectives.

For instance, employees may use company social media accounts to:

- respond to **customer enquiries** and requests for help;
- share **blog posts, articles and other content** created by Autism Bedfordshire;
- share **insightful articles, videos, media and other content** relevant to the business, but created by others;
- provide fans or followers with **an insight into what goes on at Autism Bedfordshire**;
- promote **marketing campaigns** and special offers;
- support **new product launches** and other initiatives.

Social media is a powerful tool that changes quickly. Employees are encouraged to think of new ways to use it, and to put those ideas to the **Social Media Manager**.

### Inappropriate content and uses

Company social media accounts must not be used to share or spread inappropriate content, or to take part in any activities that could bring Autism Bedfordshire into disrepute.

When sharing an interesting blog post, article or piece of content, employees should always review the content thoroughly, and should not post a link based solely on a headline.

Further guidelines can be found below.

## Use of personal social media accounts at work

### The value of social media

Autism Bedfordshire recognises that employees' personal social media accounts can generate a number of benefits. For instance:

- staff members can make **industry contacts** that may be useful in their jobs;
- employees can discover content to help them **learn and develop** in their role;
- by posting about Autism Bedfordshire, staff members can help to **build the business' profile** online.

As a result, Autism Bedfordshire is happy for employees to spend a reasonable amount of time using their personal social media accounts at work.

### Personal social media rules

#### Acceptable use:

- Employees may use their personal social media accounts for **work-related purposes** during regular hours, but must ensure this is for a **specific reason** (e.g. competitor research). Social media should not affect the ability of employees to perform their regular duties.
- Use of social media accounts for non-work purposes is **restricted to non-work times**, such as breaks and during lunch.

#### Talking about Autism Bedfordshire:

- Employees should ensure it is clear that their social media account **does not represent Autism Bedfordshire's views** or opinions.
- Staff may wish to **include a disclaimer** in social media profiles: 'The views expressed are my own and do not reflect the views of my employer.'

### Safe, responsible social media use

The rules in this section apply to:

- any employees using company social media accounts;

- employees using personal social media accounts during company time.

#### Users must not:

- create or transmit material that might be **defamatory or incur liability** for Autism Bedfordshire;
- post message, status updates or links to material or **content that is inappropriate\***;

\*Note - Inappropriate content includes: pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, or materials relating to cults, gambling and illegal drugs. This definition of inappropriate content or material also covers any text, images or other media that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

- use social media for any **illegal or criminal activities**;
- send **offensive or harassing material** to others via social media;
- broadcast **unsolicited views** on social, political, religious or other non-business related matters;
- send or post messages or material that **could damage Autism Bedfordshire's image or reputation**;
- discuss **colleagues, competitors, customers or suppliers** without their approval;
- post, upload, forward or link to **spam, junk email or chain emails and messages**.

### Copyright

Autism Bedfordshire respects and operates within copyright laws. Users may not use social media to:

- publish or share any **copyrighted software, media or materials owned by third parties**, unless permitted by that third party;
- share links to **illegal copies** of music, films, games or other software.

### Security and data protection

Employees should be aware of the security and data protection issues that can arise from using social networks.

#### Maintain confidentiality

Users must not:

- share or link to any content or information owned by Autism Bedfordshire that could be considered **confidential or sensitive**;
- share or link to any content or information owned by another company or person that could be considered **confidential or sensitive**.

- share or link to data in any way that could breach Autism Bedfordshire's **data protection policy**.

### Protect social accounts

- Company social media accounts should be **protected by strong passwords** that are changed regularly and shared only with authorised users.
- Wherever possible, employees should use **two-factor authentication** (often called mobile phone verification) to safeguard company accounts.
- Staff must not use a new piece of **software, app or service** with any of Autism Bedfordshire's social media accounts without receiving approval from the [social media manager].

### Avoid social scams

- Staff should watch for **phishing attempts**, where scammers may attempt to use deception to obtain information relating to either Autism Bedfordshire or its members.

Employees should never reveal sensitive details through social media channels. Identities must always be verified in the usual way before any information is shared or discussed.

- Employees should **avoid clicking links** in posts, updates and direct messages that look suspicious. In particular, users should look out for URLs contained in generic or vague-sounding direct messages.

## Policy enforcement

### Monitoring social media use

Company IT and internet resources — including computers, smart phones and internet connections — are provided for legitimate business use.

Autism Bedfordshire therefore reserves the right to monitor how social networks are used and accessed through these resources.

Any such examinations or monitoring will only be carried out by authorised staff.

Additionally, all data relating to social networks written, sent or received through Autism Bedfordshire's computer systems is part of official Autism Bedfordshire's records.

Autism Bedfordshire can be legally compelled to show that information to law enforcement agencies or other parties.

### Potential sanctions

Knowingly breaching this social media policy is a serious matter. Users who do so will be subject to disciplinary action, up to and including termination of employment.

Employees, contractors and other users may also be held personally liable for violating this policy.

Where appropriate, Autism Bedfordshire will involve the police or other law enforcement agencies in relation to breaches of this policy.

## Website privacy policy

### Key details

This website privacy policy describes how Autism Bedfordshire protects and makes use of the information you give Autism Bedfordshire when you use this website.

If you are asked to provide information when using this website, it will only be used in the ways described in this privacy policy.

This policy is updated from time to time. The latest version is published on this page.

This website privacy policy was updated on: **04/05/2018**

If you have any questions about this policy, please email [email address] or write to: Autism Bedfordshire, Salamander House, 2-10 St. John's Street, Bedford MK42 0DH.

### Introduction

We gather and use certain information about individuals in order to provide products and services and to enable certain functions on this website.

We also collect information to better understand how visitors use this website and to present timely, relevant information to them.

### Privacy Notice - transparency of data protection

Being transparent and providing accessible information to individuals about how we will use their personal data is important for our organisation. The following are details on how we collect data and what we will do with it:

#### What information is being collected?

##### *Information given by service users*

In order to provide our services we need to collect and use personal information regarding the following:

Opt in marketing communications (electronic newsletters, campaign sign ups)

Supporters including donors, fundraisers, digital supporters, shop customers.

We will obtain personal information through enquiries about our activities and services, registrations for events, emails, registrations for our newsletters and updates, purchases from our online shop, donations, applications for job vacancies, questions regarding our organisation or people providing personal information for other purposes.

Below are examples of personal data held by us:

Newsletter mailing lists and marketing updates o Fundraising or supporter data

Event administration or shop purchases

### *Information we may gather from our website*

We will gather general information on how users interact with our website such as the number of pages visited. This information is collected to help measure how users interact with our website and content. This is done by using tracking software from our third party supplier Google Analytics. For further information on Google Analytics visit Google's information page. To opt out of google analytics visit: <https://tools.google.com/dlpage/gaoptout>

### **How we use information**

#### *Supporter Information*

We will collect information from donors, purchases from our shop, new members and fundraisers.

The information collected will usually be more than one of the following:

- Name
- Contact details
- Bank or Credit Card details
- email address

We require this information for the following reasons:

- to provide the relevant information or service that has been requested.
- to administer donations or sales, including processing gift aid.
- to thank those who have made donations or supported Autism Bedfordshire.

#### *Electronic communications*

We will collect information from those who sign up to receive further communications from us electronically including general updates, service updates including family events, careers or fundraising.

The legal basis for us to process this information is that consent has been given. We use a third party provider, MailChimp, to deliver our e-newsletter, we store contact information in our MailChimp account, we will use our MailChimp account to send marketing updates and gather statistics around email opening and clicks to help us monitor and improve our e-newsletter.

For further information please see Mail Chimp's privacy policy.

The information collected will be the following:

- Name
- Area
- Interest
- Email address

We will only use this information for the purposes selected when opting in to receive electronic communication. Recipients can change their mind at any time by clicking the unsubscribe link in the footer of the email, or by contacting us at [enquiries@autismbeds.org](mailto:enquiries@autismbeds.org)

### ***Social media***

Private or direct messages sent via social media will be stored on our social media account for three months. It will not be shared with any other organisations.

### ***Who do we share information with?***

We will never sell or rent information to another party or organisation. Information provided as part of a Gift Aid declaration may be disclosed to HMRC as part of the declaration to reclaim Gift Aid. We may share or disclose your personal information if we are required to do so by any law or court order.

### ***How we use cookies on our website***

Cookies are small text files that are automatically placed onto devices by some websites. They are widely used to improve the performance of a website, for saving different options and to provide website owners with information on how the site is being used. We do not use our own cookies but there will be a number of third party cookies from our trusted suppliers used on our websites. Each company is responsible for the cookies that they place onto your device and have separate policy documents to highlight their use. Our list of trusted third parties who may deploy cookies is below with a link to their cookie details:

Third Party	Policy Location
YouTube	<a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a>
MailChimp	<a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a>
Google	<a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a>
Google Analytics	<a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a>
Facebook	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
Twitter	<a href="https://support.twitter.com/articles/20170514">https://support.twitter.com/articles/20170514</a>
Linked In	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
Shopify	<a href="https://www.paypal.com/uk/webapps/mpp/ua/cookie-full">https://www.paypal.com/uk/webapps/mpp/ua/cookie-full</a>
Just Giving	<a href="https://www.justgiving.com/info/cookies">https://www.justgiving.com/info/cookies</a>
Paypal	<a href="https://www.paypal.com/uk/webapps/mpp/ua/cookie-full">https://www.paypal.com/uk/webapps/mpp/ua/cookie-full</a>

### ***The right to see information held by Autism Bedfordshire***

Under the new EU General Data Protection Regulation (GDPR) individuals have the right to confirmation that their data is being processed and the right to access to their personal data. For further information visit: <https://ico.org.uk/for-the-public/>

They have the right to request:

- Access to the personal data we hold (free of charge in most cases).
- The correction of personal data when incorrect, out of date or incomplete.
- That we stop using personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of personal data after withdrawal of that consent.

Requests to see personal information held by us should be sent to: Autism Bedfordshire, Suite B1, 1 Hammond Road, Elms Farm Industrial Estate, Bedford, Bedfordshire, MK41 0UD.

#### *How long we keep information?*

Whenever we collect or process personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and planning.

#### *Request to delete information?*

Under the new EU General Data Protection Regulation (GDPR) that will be coming into effect across all member states from the 25th May 2018, individuals will have the right to request deletion of personal information if the following applies:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- Where consent is withdrawn.
- Where the subject objects to the processing and there is no overriding legitimate interest for continuing the processing.
- Where personal data has been unlawfully processed (i.e. otherwise in breach of the GDPR).
- Where personal data has to be erased in order to comply with a legal obligation.
- Where personal data is processed in relation to the offer of information society services to a child.

#### *How we protect personal data*

We know how much data security matters and will treat data with the utmost care and take all appropriate steps to protect it. We secure access to all transactional areas of our websites and apps using 'https' technology. Access to personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption.



We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

### **Contacting the Regulator**

If an individual feels that their data has not been handled correctly, or if they are unhappy with our response to any requests they have made to us regarding the use of their personal data, they have the right to lodge a complaint with the Information Commissioner's Office.

You can contact the Information Commissioner's Office on 0303 123 1113.

### **Conditions for processing**

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. All staff who are responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice.

### **Justification for personal data**

We will process personal data in compliance with all six data protection principles.

We will document the additional justification for the processing of sensitive data, and will ensure any biometric and genetic data is considered sensitive.

### **Consent**

The data that we collect is subject to active consent by the data subject. This consent can be revoked at any time.

### **Criminal record checks**

Any criminal record checks are justified by law. Criminal record checks cannot be undertaken based solely on the consent of the subject.

### **Data portability**

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free.

### **Right to be forgotten**

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

### **Privacy by design and default**

Privacy by design is an approach to projects that promote privacy and data protection compliance from the start. The DPO will be responsible for conducting Privacy Impact Assessments and ensuring that all IT projects commence with a privacy plan.

When relevant, and when it does not have a negative impact on the data subject, privacy settings will be set to the most private by default.

### International data transfers

No data may be transferred outside of the EEA without first discussing it with the data protection officer. Specific consent from the data subject must be obtained prior to transferring their data outside the EEA.

### Data audit and register

Regular data audits to manage and mitigate risks will inform the data register. This contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

### Reporting breaches

All members of staff have an obligation to report actual or potential data protection compliance failures. This allows us to:

- Investigate the failure and take remedial steps if necessary
- Maintain a register of compliance failures
- Notify the Supervisory Authority (SA) of any compliance failures that are material either in their own right or as part of a pattern of failures

Please refer to our Compliance Failure Policy for our reporting procedure.

### Monitoring

Everyone must observe this policy. The DPO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to.

### Consequences of failing to comply

We take compliance with this policy very seriously. Failure to comply puts both you and the organisation at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under our procedures which may result in dismissal.

## Mobile Phone Policy

### Company Mobile Phones

Where a mobile phone has been issued by Autism Bedfordshire, it is for business use only and at all times will remain the property of the Autism Bedfordshire. The user(s) will be responsible for its safekeeping, proper use, condition and eventual return to the Company. The user will also be responsible for any cost of repair or replacement other than fair wear and tear. If a replacement is required the Autism Bedfordshire will arrange this.

A mobile phone is provided primarily to enable the user to do their job, i.e. to keep Autism Bedfordshire informed at the earliest opportunity of matters which it needs to know about and to be similarly contactable by Autism Bedfordshire, or to contact service users or the office when working remotely. Therefore, it is the user's responsibility to ensure that the mobile phone is kept charged and switched on whilst on duty.

Users should not sign up to text based information services, e.g. RAC traffic alerts, text voting. The use of the internet on Autism Bedfordshire mobile phones is subject to Autism Bedfordshire's Internet Use Policy. Unless agreed by the Chief Executive Officer or IT Manager, applications and other programmes may not be downloaded to any mobile phone under any circumstance.

The SIM card from Autism Bedfordshire mobiles should not be placed into any other mobile, unless to another Autism Bedfordshire issued mobile phone.

Autism Bedfordshire recognises that users may, on occasion, have to make personal calls or send personal text messages during working hours, or outside normal working hours. Where it is deemed that an unreasonable amount of personal calls/text messages have been made using the mobile phone, Autism Bedfordshire reserves the right to deduct those costs, either through deduction from pay, or otherwise. Autism Bedfordshire may, after formal investigation, take action under the Disciplinary Policy & Procedure if such use is excessive or unauthorised. Users will be expected to make payment for private calls made beyond reasonable usage.

If it is found, following investigation, that there has been excessive personal data use, then the user will be asked to reimburse Autism Bedfordshire for the cost of this and action may be taken under the Disciplinary Policy & Procedure.

The user agrees that upon termination of employment, should they not return the allocated mobile phone, or should the mobile phone be returned in an unsatisfactory condition, the cost of replacement, or a proportional amount of this as decided by Autism Bedfordshire, will be deducted from any final monies owing, or the user will otherwise reimburse Autism Bedfordshire.

### **Use of a Mobile Phone Whilst Driving**

The user must ensure they have full control of any vehicle that they are driving at all times.

It is an offence to use hand held mobile phones whilst driving or whilst the engine is turned on. The user will be liable for prosecution if they are holding a mobile phone, or any other type of hand held device to send or receive any sort of data, be it voice, text or pictorial images. The user will be regarded to be driving if they are in charge of a vehicle with its engine running on a public road, even if the vehicle is stationary. It is therefore strictly forbidden for the user to use a hand held mobile phone whilst driving.

A mobile phone may only be used where there is an in-coming call or an out-going voice activated call through a hands free device that is activated without a need to hold the phone at any time, in which case the call should be kept to the shortest possible time and only to effect essential communications. When the phone needs to be operated to make or deal with a call through the hands free device for longer than receiving or giving a short communication, before doing so the user must stop and park the vehicle where it is safe and lawful to do so and with the engine switched off. Whilst driving they must not use the text message facility on the mobile phone, or if available through such a phone, an image facility or internet access.

Individuals are personally responsible for the payment of any fine or fixed penalty (including any externally raised admin charges) incurred whilst in charge of the vehicle. Any conviction for driving offences, any driving endorsements and any fines incurred must be reported immediately to line management as this may affect Autism Bedfordshire's insurance.

It should be noted carefully that a breach of Autism Bedfordshire's rules on the use of a mobile phone whilst driving may render the user liable to action under the Disciplinary Policy & Procedure.

### Lost or Stolen Mobiles

The user is responsible at all times for the security of the mobile phone and it should never be left unattended. A PIN number should be used on the mobile to enable voicemails to be picked up. If unsure how to do this, please contact the Autism Bedfordshire Office to speak to the appropriate person for instructions.

If the phone is lost or stolen, this must be reported to immediately (if during working hours), or if out of hours phone [Vodafone direct on 0161 446 4310](tel:01614464310) to ensure that the account is stopped and there is no unauthorised usage.

In the event of theft of a mobile phone, the incident must also be reported to the police and an incident number obtained (please provide this number when reporting the loss to the Autism Bedfordshire office).

Autism Bedfordshire reserves the right to claim reimbursement for the cost of the phone, or excess usage charges should the correct procedures not be followed, a user reports repeated loss of their mobile, it is deemed that the user has not taken appropriate measures to safeguard the equipment, or reported the loss thereof (which will be investigated by Autism Bedfordshire and judged at its absolute discretion).

### Support

Should there be any queries on the use of a company mobile, please contact the Autism Bedfordshire office to speak to the appropriate person.

## Monitoring of Usage and Costs

Autism Bedfordshire receives itemised billing for all company mobile phones and this is monitored on a monthly basis. The billing system identifies all calls, texts and data usage (if appropriate) and the costs related to this, by user, destination, duration, frequency, etc. High or clear personal usage will be reported to line management for investigation (high usage is defined as usage which falls outside of the normal usage pattern for the individual, or outside of the usage pattern in comparison to other similar users).

This monitoring will allow Autism Bedfordshire to identify any areas of potential misuse or training that may be required, or to negotiate with suppliers any necessary changes in tariffs to ensure cost efficiency.

If it is found the mobile has been misused, Autism Bedfordshire may, after formal investigation, take action under the Disciplinary Policy & Procedure.

## Mobile Phone Use Abroad

All company mobile phones are barred from being used abroad unless the network provider has been specifically instructed by Autism Bedfordshire. In the event that a bar needs to be lifted, please contact the Autism Bedfordshire office in order that this may be considered.

It is particularly important on Smartphones to ensure that “data roaming” is switched off for any times other than checking company emails. “Data roaming” charges from abroad (which includes the Isle of Man and Channel Islands) can result in very high level charges, and if it is found that these have been incurred due to personal use or negligence on the part of the user, then the charges may be passed on to the user.

## “Pool Phones”

Certain phones are allocated to groups rather than individual users. In this situation it is ultimately the responsibility of the Team Leader or Senior Team Leader (where applicable) to ensure that all conditions (as noted above) relating to the use of the phone are complied with. However, individual staff that use, or could use such phones must ensure they also comply with the conditions.

## Personal Mobiles

Groups/ Summer Activity Schemes

Personal mobile phones cannot be kept on a person or used when in the presence of children, on the premises or when on outings during term-time groups and on summer activity schemes. This includes the mobile phones of staff, visitors and parents who wish to stay for significant periods of time within the setting.

To ensure this we will make sure that:

- The use of unsanctioned mobile telephones or other electronic devices is not permitted whilst on site or while working in a paid or voluntary capacity for Autism Bedfordshire.
- All mobile phones will be kept in a secure place throughout contact time with children and be returned to the owner at the end of the session by the Team Leader.
- Mobile phone calls may only be taken at staff breaks or in staff members' own time in a suitable location where children are not present.
- In the case of a personal emergency, family or other significant persons may call you on an agreed telephone number at the location. It is the responsibility of staff members to make their families aware of the telephone number to be used in an emergency.
- During group outings nominated staff will have access to a mobile phone which is to be used for emergency purposes only. Contact details of families will not be stored on this phone. If possible a phone without a camera or video function will be used.
- It is considered gross misconduct for staff and/or volunteers to use or to be in the possession of unsanctioned mobile telephones or other electronic devices whilst on site or while working in a paid or voluntary capacity for Autism Bedfordshire. Unauthorised use of a personal mobile phone during working hours may result in a disciplinary warning or dismissal, depending on the circumstances.

### Anti-Harassment

Staff must be aware that certain operations that may be performed on mobile phones may breach Autism Bedfordshire policies and procedures. The sending of text messages or digital images that are or could be deemed offensive is strictly prohibited.

The photographing or filming of fellow employees, residents, visitors or any member of the public without their consent may breach an individual's right to privacy and could, in certain circumstances, constitute harassment. This is therefore strictly forbidden.

It is against the principles of Autism Bedfordshire for any person to be harassed in such a way, and will not be tolerated. Any instance will be investigated. Should a staff member be found to have used a mobile phone in such a way they may be subject to the Disciplinary Policy & Procedure, which could include dismissal. Any individual who feels they have been a victim of this form of harassment should bring this to the attention of their line manager immediately.