

MS Teams

Data Protection guidelines

SMARTER  TOGETHER



Principles

All HSE staff are obliged to ensure that information and records are appropriately managed and to adhere to [national HSE IT policies](#) including those listed below. Users should also adhere to their own relevant professional codes of practice. See also [FAQs](#) on HSE IT policies.

- Information Security Policy
- IT Acceptable Usage Policy
- Electronic Communications Policy

Personal Use

- Use of MS Teams is for communication and collaboration in the course of HSE duties only. Personal use for non-HSE related duties is not permitted.

Clinical Use

- Attend Anywhere is the HSE's virtual clinical consultation platform; details are available [here](#). MS Teams is **not** intended for use as a platform for sensitive 1:1 clinical consultations; however it may be used for larger patient education/advice groups where appropriate i.e. where sensitive personal data will not be shared. For more information on working with groups see [here](#)
- See also HSE Clinical Governance [guidelines](#)

Guest Membership

- Guests, once added, have access to almost all team materials, including files, past chat conversations etc. Guests therefore should only be added to Teams where significant and on-going document collaboration is required. You should not add guests to teams where simply a meeting or series of meetings with them will suffice.
- Where 'guest' access is required, all third parties are requested to complete and sign appropriate HSE Data agreement(s) before they can be added. Potential guests using personal emails e.g. Gmail/Hotmail cannot be added. Please e-mail orla.heffernan@hse.ie for further information or queries on guest access.

Teams Creation, Membership and Management

Creation

- If you need to set up a team, you should ensure that there are 2 team owners. Team owners are responsible for the management of the Team, including ensuring that data protection obligations are met.
- When creating a team, the 'private' option should be selected to ensure that data is shared only with team members.



Membership

- Team owners should also regularly review Team membership and delete memberships of those who may have moved from their original role.

Workspace Management

- Use private channels for discussion or document collaboration on sensitive matters; private channels can be restricted to specific members only.
- Check who has access to particular chat threads by clicking the  'Participants' icon to the top right of the screen
- All data (including chat messages) in MS Teams is subject to Data Access and Freedom of Information requests under Irish data protection and FOI legislation respectively.
- Discussions about other members of staff e.g. via Chat or recorded meeting are also subject to the Data Protection legislation- Teams is therefore not an appropriate forum for any such discussion.
- MS Teams is designed as a tool to aid collaboration and is not a permanent storage space. Do not use Teams as a permanent record repository- ensure records are appropriately stored in relevant project or clinical data store elsewhere.

When scheduling a Teams Meeting...

- Double-check all invitees' email addresses and ensure that only those who need to be in the meeting are invited.
- You can disable attendees' camera and mics in the Meeting Options. Consider this option for sensitive meetings and/or where attendees may be unfamiliar with Teams tools. You can enable the settings during the meeting as required.
- Know who you are interacting with; each meeting link is a 'meeting room key' – share meeting links with caution i.e. to known and/or trusted contacts only.
- Where the meeting is of a sensitive nature, consider the 'disallow' option for forwarding of meeting links. If organising via Outlook choose 'Attendees' and uncheck 'Allow forwarding'. If organising directly from the Teams calendar choose 'Response Options' to uncheck the setting.
- Avoid creating recurring meetings except for small meetings with the same group of close HSE colleagues; set each meeting up separately even if it is on every week at the same time. Having more than one meeting link reduces 'oversharing' risk. Meeting with non-HSE attendees should never be 'recurring'.
- Creating a unique meeting link also means that each meeting has its own chat i.e. attendees will not be able to see the previous week's chat, as they might be able to if it was set up using a recurring meeting link.
- Never share a HSE meeting link in a public setting, such as on social media or online bulletin boards, in blog posts or news articles, or on email lists with wide distribution.



- Configure meeting options appropriately and remember that you can change settings in the meeting as well as beforehand:
 - Presenter options; the default option is 'everyone' can present. Change settings as required e.g. that only the organiser/named presenters can present. For more information on the organiser and presenter roles, see [here](#)
 - Chat; Consider disabling the 'Chat' in Meeting Options if concerned about potentially inappropriate or sensitive data being shared. You can also choose 'In meeting only' Chat; chat cannot then continue after the meeting in the Teams space. For more information see [here](#)
 - Lobby; do not allow attendees to come directly into the meeting if they are unknown (where practical).
 - Ensure that 'record automatically' is not enabled i.e. never change the default setting from 'no' to 'yes'

Managing a Meeting

- An 'Attendance List' will appear automatically in the Chat for the Organiser (only) shortly after the meeting ends. The information in the Attendance List e.g. email addresses should not be subsequently used for any other purpose other than confirming attendance at the meeting.
- Be aware of your background surroundings; you can choose a background /'blur background' in Meeting Options. You can also add a background with your project logo or the HSE logo. See [here](#) for details.
- Ensure, as the meeting organiser that you 'end call' rather than 'leave call'.

Meeting Recording

- MS Teams meetings should be recorded only when absolutely necessary for vital purposes and appropriate information sharing e.g. sharing of an important training session with known colleagues. Recordings should not for example, be made of regulatory or disciplinary meetings e.g. tender approval decision or HR disciplinary meeting. Equally meeting recordings should not be used as 'minutes' i.e. a record of discussions had and/or decisions reached in meetings.
- MS Teams meetings with patients or service users should never be recorded under any circumstances.
- As above, ensure that the 'record automatically' option is at the default 'no' setting.

Recording; before you send the relevant meeting invitation:

- Advise attendees if the meeting will be recorded in advance and why this is necessary. It is crucial that this is done **in advance** of the meeting.



- Advise the attendees how/with whom the recording will be shared. The recording cannot be subsequently shared on an ad hoc basis- meeting attendees must be advised in advance e.g. *'this recording will be shared with all 2nd year student midwives in South region'*
- Add the following text to the meeting invitation/email.

'Please note that the meeting on X date, at Y time, regarding Z will be recorded. It will be used only for X purpose (e.g. training). It will be accessed by Y and will be deleted before Z date'

Recording; before you start the meeting:

- Reiterate that the meeting is being recorded and offer attendees the opportunity to leave the meeting if so desired.

Recording; after the meeting:

- Share the recording only with those recipients identified above and only where information is critical for service delivery.
- Meeting attendees (enabled with Office 365/Teams) can access the recording via the meeting Chat. Alternatively, if the meeting was created in a Channel, members can access the meeting in the Channel
- To share the recording with colleagues who weren't at the meeting (with permission from attendees)
 - **Sharing within HSE (0365-enabled only)**
If you know that recipients have 0365/Teams, you can simply open the recording and select 'share'.
 - **Sharing within HSE (including staff who do not have 0365/Teams)**
If the information is critical for service/operations delivery, you can request a link to a HSE video-sharing site by emailing internalcomms@hse.ie. Note- not all requests can be facilitated.
 - **Sharing with non-HSE colleagues**
Again, only if critical for service/operations delivery, you can request a link to a HSE video-sharing site by emailing internalcomms@hse.ie. Note- not all requests can be facilitated.
- Delete the recording as soon as practicable e.g. once the 'message' has been transmitted.

For more information on all aspects of working with MS Teams, please see [here](#)