

Office of the Police and Crime Commissioner for Cleveland



OPCC WhatsApp Policy

Policy Owner	
Hannah Smith	Commissioner's Officer for Communications and Information (Data Protection Officer)

Version History		
Version No.	Version Date	Reviewer
V1.0	June 2020	
V2.0	August 2020	Hannah Smith

Use of WhatsApp for business purposes

This guidance note is an interim policy statement bringing together and re-stating existing guidance, pending the adoption of a refreshed suite of policy and procedures as part of our ongoing information compliance work.

We will also, over the next few months, need to adopt fuller guidance about issues like the use of 'employee-owned devices' when we move to the Office 365 suite available to Cleveland in due course under the police national enabling programme.

It is also acknowledged that some teams within the OPCC may have utilised WhatsApp more frequently during 2020 as a way of communicating efficiently and effectively during the Covid-19 lockdown, when remote working became the norm and direct face to face interactions in the office became much less feasible.

This updated guidance document is an opportunity to remind staff that WhatsApp is **not** an approved business tool of the Office of the Police and Crime Commissioner and therefore it **should not** be used as a substantive method of holding and/or exchanging business information for one-to-one, work-related correspondence between colleagues.

At this time, the OPCC only supports (and recommends) the use of WhatsApp for business purposes in the form of a limited number of chat groups. These groups carry OPCC logos and have defined business purposes. The policy for work-related WhatsApp groups appears later in this document and is unchanged from previous guidance.

Staff are encouraged to maximise the use of the most appropriate choice of existing communications methods provided for business use, including email, telephone and if appropriate, Jabber, to engage with their colleagues on a one-to-one basis about work-related issues. It is hoped that the integration of Microsoft Teams on our computer systems will give us even greater functionality to interact remotely as individuals and teams, using a mix of face to face interaction and instant messaging – as well as providing opportunities for similar informal, inter-organisational correspondence with partner organisations outside the immediate Cleveland Police network.

These recommendations not only encourage good information management, but should limit the amount of work correspondence received on personal devices – promoting a healthy work-life balance and drawing a separation between personal and work-related conversations with colleagues.

Please note: (a) this guidance does not cover personal conversations you have with your colleagues on WhatsApp; and (b) for the avoidance of doubt, other similar instant messaging platforms hosted on personal devices (such as iMessage, Messenger, Snapchat or similar) are covered by this guidance and are not approved for holding or exchanging substantive business information.

WhatsApp Groups

It is recognised that the use of business-related WhatsApp groups can offer a real benefit to the organisation in communicating urgent or short-term messages with a small group.

It is important that any group chats used for work-related purposes maintain the same high levels of housekeeping and information management as our other information systems.

We all have a role to play in ensuring these standards are upheld and I propose the below policy for management of Whatsapp chats, to meet the requirements in the Data Protection Act and General Data Protection Regulations (GDPR).

- As with all work correspondence, messages posted in work-related Whatsapp groups should be professional and appropriate. Social chat groups are permitted for correspondence about non-work topics and therefore will not be subject to this policy.
- Every seven days, members of a group chat will be asked to delete all messages from the previous seven days.
 - This can be done by clicking on the group name at the top of the chat, scrolling down and selecting 'Clear Chat'.
 - Guidance on how to clear chat messages is included in Appendix A.
- It is the responsibility of the group admin to issue a prompt every seven days to remind members that they need to clear the chat.

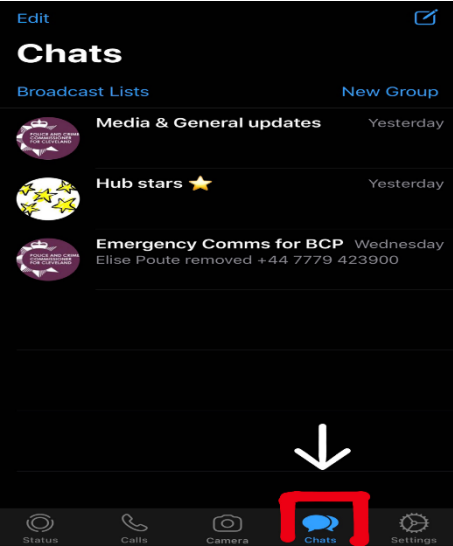
This policy will ensure that we do not process or store information for any longer than is necessary – a key requirement of the DPA and GDPR.

Whatsapp is used for instant messaging rather than for formal correspondence. It follows that the transitory nature of Whatsapp messaging is consistent with regular disposal by way of deletion.

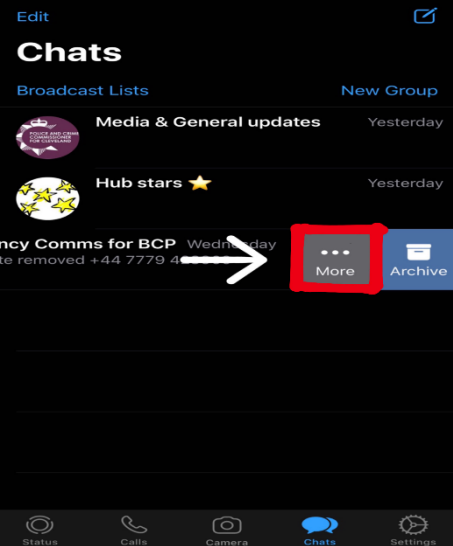
The content of Whatsapp chats and groups that are wholly or mainly work-focussed, may be material which could be requested under the Freedom of Information Act and establishing a consistent 'retention and disposal' policy and approach, requiring regular 'clear-down' by way of housekeeping aimed at good legal compliance, will provide clear guidance to requesters about how and why we do not retain Whatsapp chat messages for longer than necessary.

Appendix A

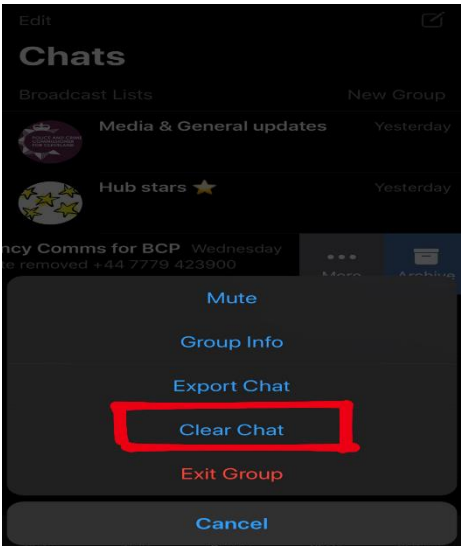
Step 1: Open Whatsapp > Select chats



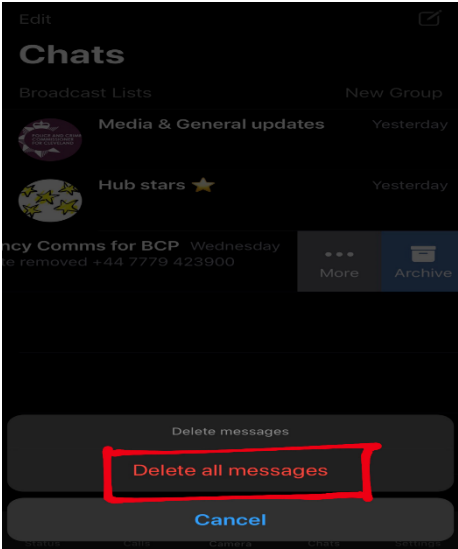
Step 2: Swipe left on the chat/messages you would like to clear > Select more



Step 3: Select clear chat



Step 4: Select delete all messages



All clear!

