



Microsoft Teams Data Protection Guidelines

General principles

- Users must adhere to their relevant professional codes of practice, along with relevant [national IT policies](#), including those listed below, to ensure that information and records are appropriately managed. See also [FAQs](#) on HSE IT policies.
- Information Security Policy
- IT Acceptable Usage Policy
- Electronic Communications Policy
- 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.
- Meeting sessions, or screenshots of HSE MS Teams meeting sessions, are NOT permitted to be recorded/shared.

Please also read the below guidance:

Personal Use

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

Clinical Use

- Attend Anywhere is the HSE's virtual clinical consultation platform, and details are available [here](#). MS Teams is **not** intended for use as a platform for sensitive 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.
- HSE Clinical Governance [guidelines](#)

Document Storage + Management

- 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.



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. Where simply a meeting or series of meetings is required, a meeting invitation/link should be sent instead.
- Where 'guest' access is required, all third parties are requested to complete and sign the appropriate HSE Data agreement(s). Please e-mail orla.heffernan@hse.ie for further information. Guests will be removed from non-compliant teams where agreements are not completed.
- When issuing the invitation, you should exclude personal email addresses e.g. gmail unless absolutely required (e.g. patient in a patient education group).

Teams Creation and Membership

- If you *do* need to set up a team, you should ensure that there are 2 team owners. As above, the team owners are responsible for the management of the Team, including data protection obligations.
- Team owners should also regularly review Team membership and delete memberships of those who may have moved from their original role.
- When creating a team, the 'private' option should be selected to ensure that data is shared only with team members. Note that all information stored in a *public* team is accessible by all Teams users - not only the users in your own team.

Information Sharing in Teams Meetings

- Double-check all invitees' email addresses and ensure that only those who need to be in the meeting are invited. Know who you are interacting with.
- Post appropriately. Private messaging is available to send direct messages.
- Exercise particular caution if there are unfamiliar third parties in the meeting and consider a brief 'intro' for each attendee (where practical) at the beginning of the meeting.
- Ensure that you 'end call' properly.
- Be aware of your background surroundings; you can choose a background /'blur background' in Teams. You can also add a background with your project logo or the HSE logo.
- Do not disclose personal information.
- Screen sharing, if necessary, should be agreed in advance with the Chair; do not 'share your screen' without agreement.



Members v external users v guests; the Project Blue example

Question

'I run a clinical project around diabetes education and support. I have MS Teams and I have set up a team for our core project group called 'Project Blue team'. I'm the team owner and I now need to arrange a meeting with 10 people including:

- 3 colleagues
- a supplier (weekly document-sharing needed apart from the meeting)
- a group of 4 service users (patients)

I am not sure if they have MS Teams or not so don't know how that works and I am concerned about my data protection obligations.

Answer

1. You are the **team owner**. You should nominate a second owner. You are both responsible for ensuring that data protection obligations are met.
2. Your **HSE colleagues** can be added as team members. You need to ensure that the team membership is current e.g. any leavers' are removed from the team.
3. The **supplier**, as he/she needs on-going document access, should be asked to complete data sharing agreements, and can then be added as a **guest user**. If added as a guest before documents have been completed, he /she will be removed. Note that the supplier will now be able to access all documents/ chat etc.- you may wish to set up a private channel within the team for sensitive documents that you do not want the supplier to access. For details on data sharing documents, contact orla.heffernan@hse.ie
4. The **service users** should never be added to the team. They are **external users**. Simply send these attendees the relevant meeting links via email invitation. Note: if they are added to the team as members in error, they will be removed.