

Restricted Use of WhatsApp Guidance



Covid-19 Response:

Interim measures with regard to the restricted use of
 WhatsApp

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Related Documents	ICT Remote Working Guides on COVID-19 Staff Internet Page

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31st March 2020

1. Purpose of this document

It is proposed that WhatsApp with restricted use will be enabled for specific and controlled purposes during the COVID-19 crisis, as one alternative that practitioners can use instead of face to face home visits, access visits and other direct contact situations. WhatsApp, with over 2 billion users, is considered one of the world's most popular digital communications channels. This guidance is meant for practitioners that may consider the use of WhatsApp to be of benefit in these types of engagements with families, young people and children during this crisis period. The guidance also provides an overall summary of all digital communications options available for Tusla staff with links to relevant user guides.

It is recognised that many children in care already have their own personal phones, or have access to phones in their care setting and are likely to already have long established personal use of WhatsApp to communicate with their parent(s). This document does not relate to this existing personal use of WhatsApp by a child in care and their parents as it is assumed this will continue as normal.

2. Background

The COVID-19 crisis has created significant challenges to the delivery of child protection & family services, including the limitations that COVID-19 related restrictions have placed on visits and face to face contact that are essential aspects of the delivery of social work, social care, family support, educational support and therapeutic services. In response to this impact on the delivery of these services, the Tusla Crisis Management Team (CMT) established a program of work to explore and implement technology based communication channels, that will provide digital alternatives to alleviate the impact of these restrictions, as best as is possible.

The majority of Tusla staff are equipped with smart phones and laptops that provide a range of options that practitioners can use to support communications with service users, including voice calls, teleconference, text messages and secure email. However, much of the communication in normal practice sessions is driven by non-verbal cues, such as facial expressions and body language. As such a key additional option required is the capability for video calling to provide practitioners with the ability to see children. This visual engagement is also very important and reassuring from the child's perspective, in seeing the face of the practitioner they are talking to. Other engagements, such as access visits between a parent(s) and a child in care, are also impacted by the COVID-19 related restrictions, where a risk assessment may determine that a traditional visit is not safe. In these situations, it is likely that both the parent(s) and child would welcome the option of a video call. Based on these factors it is imperative that a video calling solution is available for practitioners, children and families at this time.

3. Potential Options and Data Privacy Considerations

There are many technical options that provide video calling capability. However, it is considered necessary to select an option that is already likely to be in use by all service users on their personal phones. Otherwise, to request parents, children or carers to install and get familiar with a new system or application will add unnecessary worries for them at this distressing time. At the same time Tusla must remain focused on data privacy requirements, and reach a balance in providing essential care and connection for service users while at the same time maintaining privacy.

4. Restricted Use of WhatsApp temporarily permitted

The restricted use of the WhatsApp service is temporarily permitted during the COVID-19 emergency, based on the requirements as outlined in the previous sections of this document for video calling to support the essential work of child and family services. WhatsApp is selected due to its widespread use and the almost certainty that every service user is already using WhatsApp on their personal phones.

However, to ensure data privacy **WhatsApp should only be used by practitioners to receive video calls from service users, to video call back a service user who has called or messaged them, or, to monitor a safety network group they were invited to attend.** The table below outlines the privacy measures to be taken, these measures are necessary as it **is not appropriate for data such as messages or phone contact address book to be shared on or with WhatsApp by Tusla staff.** These necessary privacy measures will mean that some features of WhatsApp will not be available for use. In particular, by not allowing WhatsApp to access the phone contacts address book, the practitioner cannot make new outgoing video calls but instead can receive video calls or call back a service user, who has called or messaged them. In summary the data privacy restrictions required will mean that practitioners cannot:

- Cannot make outgoing calls, except when calling back a service user who has messaged them
- Cannot make outgoing three way or more calls, however staff can be called into a 3 way call

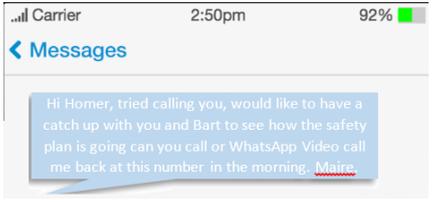
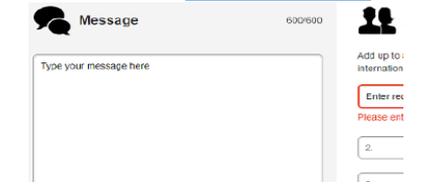
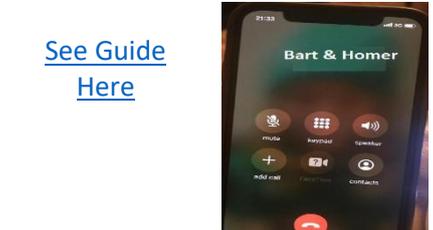
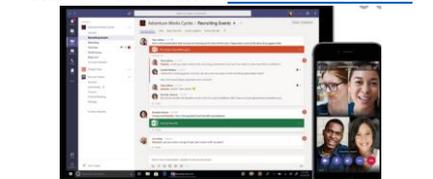
The following Do's and Don'ts must be adhered to in the use of WhatsApp to ensure data privacy

 Do's See Guide Here	 Don'ts
Install WhatsApp	Do not allow the option to share your contacts with WhatsApp
Set Maximum Privacy Settings	Do not use WhatsApp for messaging any personal data
Use WhatsApp to receive Video Calls from service users	Do not join any WhatsApps Groups apart from accepting invites from a safety network
Use WhatsApp to accept an invite from a safety network	

This proposed use of WhatsApp remains in line with Tusla's commitment to data privacy. The following controls are in place:

- WhatsApp provide a data privacy statement that confirms it provides end-to-end encryption of messages and calls, and that once messages (including your chats, photos, videos, voice messages, files, and share location information) are delivered, they are deleted from the WhatsApp servers
- As parents are the party who initiated the WhatsApp calls by calling the practitioner, then it is a reasonable and fair interpretation that parents as the call initiators are consenting to the call.

Digital Communication Options for Tusla Practitioners

I need to	Examples	Use
<p style="text-align: center;">Message or Talk</p> <div style="text-align: center;">  </div> <p style="text-align: center;">One to One</p>	<ul style="list-style-type: none"> • Contacts with a child, young person, carer or parent • Contact with colleagues or other professionals 	<p style="text-align: center;">Phone Call or Text Message</p> 
<p style="text-align: center;">Send a Group Text</p> <div style="text-align: center;">  </div> <p style="text-align: center;">One to Many</p>	<ul style="list-style-type: none"> • Contacts with partner groups or professionals 	<p style="text-align: center;">Web Text See Guide Here</p> 
<p style="text-align: center;">Video call</p> <div style="text-align: center;">  </div> <p style="text-align: center;">One to One or Two</p>	<ul style="list-style-type: none"> • Practitioner video call contact with a Parent and/or child/young person • Social working accepting a supervised access visit video call facilitated by foster parent i.e. a three way call between the parent, social worker and child on the foster parent's device 	<p style="text-align: center;">WhatsApp with privacy restrictions See Guide Here</p> 
<p style="text-align: center;">Small Group Teleconference</p> <div style="text-align: center;">  </div> <p style="text-align: center;">One to 2 or 3</p>	<ul style="list-style-type: none"> • Where practitioner has control to start and end the call and participants can't see each others numbers. E.g. Supervised Access Visit Teleconference • Any Teleconference with 2-4 participants 	<p style="text-align: center;">Mobile Phone Merge Calls Option</p> <p style="text-align: center;">See Guide Here</p> 
<p style="text-align: center;">Teleconference</p> <div style="text-align: center;">  </div> <p style="text-align: center;">1 up to 10</p>	<ul style="list-style-type: none"> • Meitheal • Strategy Meeting • Planning/Network/Team meetings • CPC Conference 	<p style="text-align: center;">See Guide Here</p> <div style="text-align: center; background-color: #FFD700; padding: 5px;"> Government Bridge Phone only </div>
<p style="text-align: center;">Colaboration, Teleconference, Video Call, Screen sharing</p> <div style="text-align: center;">  </div> <p style="text-align: center;">Large Groups</p>	<p style="text-align: center;">Note this option is pending roll out . ICT wil be in touch with your account details when availble</p> <ul style="list-style-type: none"> • Supervised Video Access Visit • Large Meeting or any meeting • Groups Collaborating on same docs • Interviews, Training etc. 	<p style="text-align: center;">Micrsoft Teams See Guide Here</p> 
<p style="text-align: center;">WhatsApp Group</p> <div style="text-align: center;">  </div>	<ul style="list-style-type: none"> • Accept an invite from a safety network group but do not message personal data to the group 	

5. Conclusion

The restricted use of the WhatsApp service is temporarily permitted during the COVID-19 emergency, based on practitioners and other Tusla users adhering to the privacy measures set out in this document.

Approved by the Tusla Crisis Management Team on 31/03/2020.