Safe Email Transmission

Standard Operating Procedure (SOP)

This guidance only applies to NHS Lothian staff, and partner agency staff based in NHS Lothian premises with an NHS Lothian provided email address. Council and partner agency staff using their employers email service must follow the guidance issued by their own employer and not assume that the detail within this guidance applies to them.

1. There is an ever-increasing demand for sensitive, confidential information to be quickly exchanged between NHS Lothian and partner agency colleagues. As well as a number of NHS Lothian approved information sharing applications and databases hosted in the secure locations, there is also considerable demand that email is used to transmit such information.

2. NHS Lothian has a closed IT network which, for the purposes of sending and receiving email, is considered to be sufficiently secure to send and receive sensitive, confidential information between NHS Lothian email addresses as listed in the grid below. It is also very important to ensure that only the correct recipients are selected when composing an 'internal' email, as there are instances of there being more than one person with the same name in the global address book.

The safe email transmission grid in the following pages give instruction as to the method of email communication that should be used for information of different security classification levels. Security classifications are as follows:

- Confidential or Sensitive data (including person identifiable data)
- General work or related, but not Confidential or Sensitive data including person identifiable
- Non work related.

Confidential or sensitive data (including person identifiable data) must at all times only be sent in accordance with the email grid.

Currently email communications with patients remains inappropriate as email does not provide adequate security for confidential correspondence, but exceptions continue to be available by application to the Caldicott guardian with provision of a risk assessment.

3. NHS Lothian also has secure email links with a number of partner agencies. This enables NHS Lothian staff to send sensitive, confidential information with these partners, as listed in the grid below. As well as ensuring that only appropriate recipients are selected when sending email to approved partner agencies, the following guidance must also be followed.

- The ‘reply to all’ function should not be routinely used, as it is bad practice to assume that all recipients have ‘safe’ email addresses.
- Where Blackberrys and Smart Phones are used for email, the data contained on these devices can be remotely wiped immediately in the event of loss or theft.
  - These devices are to be protected with an additional password or pin and when being used should be held in such a way as to prevent any onlookers from viewing sensitive data.

4. Before sending any email containing personal data, staff must double-check that they have addressed the email to the correct recipient. It is very easy for an email message to be forwarded on to additional recipients who were not on the original distribution list, without your knowledge or consent, so care must be taken with the overall content and confidentiality of the topics being discussed. Microsoft Outlook remembers previously used email addresses and, whilst it can be a useful feature, it is all too easy to accidentally send personal data to an incorrect recipient. STOP AND CHECK and, only then, SEND.
5. Any personal, sensitive or confidential information (either yours or someone else's) should not be shared or sent over the Internet or by email unless appropriate confidentiality and security procedures are used. Before sending any confidential material you must ensure that you have read, understand and abide by the NHS Lothian eHealth Security policy. This is contractual obligation of your NHS Lothian network access. If, having consulted the eHealth Security Policy and email use is deemed appropriate, ensure that you address emails only to people who really need to know about the subject and that you are aware of confidentiality and data sensitivity issues before sending messages.

6. Before sending an email containing personal data you must ask yourself:
   - Is email the appropriate, and most secure, communication method?
   - Do you have a justified purpose for using this confidential information?
   - Do you need to seek advice or authorisation?
   - Are you using it because it is absolutely necessary to do so?
   - Are you using the minimum information required, including an anonymous email header?
   - Are you allowing access to this information on a strict need-to-know basis only?
   - Can you encrypted or password-protect the message contents?

7. Staff must not encourage email communication, which may involve the transfer of personal data, with private individuals or external companies into NHS Lothian. The email matrix below defines those partner agencies with which NHS Lothian has secure links. Addresses which do not appear on this list constitute a significant risk when transferring personal data. The sending of email to non approved external addresses such as hotmail.com, doctors.org.uk or ed.ac.uk is not secure and should not be used for personal data. All mail is filtered to prevent junk email and to reduce the risk of personal data being sent via an insecure channel.

If you have any doubts or queries as to whether an email address is safe, presume it is not and STOP AND CHECK with IT Security. DO NOT use external email accounts for the transfer of personal data.


9. NHS Lothian may develop further secure email links when the need is identified and it is technically possible to enable the links within available resources. Key staff will be informed of any such developments, and the grid below will be updated as and when this happens.
**Safe Email Transmission Grid**

Applies to all Confidential or Sensitive data (including person identifiable data)

| To:                           | @nhslothian.scot.nhs.uk** | @yyy.scot.nhs.uk*** | @nhs.net | @westlothian.gov.uk | @edinburgh.gov.uk | @edin.sch.uk | @ea.edin.sch.uk | @midlothian.gov.uk | @edin.gsi.gov.uk | @edin.gse.gov.uk | @edin.gsx.gov.uk | @edin.scn.gov.uk | @edin.cjsm.net | @edin.pnn.xxx.uk | @any.ed.ac.uk | @hotmail.com | @btinternet.co.uk | @children1st.org.uk | @doctors.org |
|-------------------------------|---------------------------|---------------------|----------|---------------------|------------------|--------------|----------------|------------------|------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| From:                         |                           |                     |          |                     |                  |              |                |                  |                  |                |                |                |                |                |                |                |                |                |
| 1. @nhslothian.scot.nhs.uk**  | Y                         | Y                   | N        | N                  | N                |              |                |                  |                  |                |                |                |                |                |                |                |                |
| 2. @yyy.scot.nhs.uk***        | Y                         | N                   | N        | N                  | N                |              |                |                  |                  |                |                |                |                |                |                |                |                |
| 3. @nhs.net                  | Y                         | N                   | Y        | N                  | N                |              |                |                  |                  |                |                |                |                |                |                |                |                |

** for @nhslothian.scot.nhs.uk also read as applicable to @lothian.scot.nhs.uk and @luht.scot.nhs.uk

*** please refer to points 5 and 6

Notes:

1. All emails to academic institutions ending with “.ac.uk” or to ISP email accounts usually ending in “.com” or “.co.uk” carry a higher risk of interception and should not be used to send sensitive and/or confidential information.
2. This matrix is based upon the user being at a desk top connected to the NHS Lothian or national N3 network using NHSL mail accounts or using nhs.net mail. Sensitive and confidential information should only be sent where it is necessary and where the recipients are expecting the information to arrive by email.
3. Some council addresses are in the form of @xxx.gsi.gov.uk as against @xx.gov.uk. Mail from 1, 2, and 3 above and *.gsi addresses within East, Mid and West Lothian and the City of Edinburgh Councils only, can be considered suitable for confidential and sensitive information.
4. Mail from @nhslothian.scot.nhs.uk** to other *.gsi addresses should not be used for confidential or sensitive information. Mail from @nhs.net accounts may be used to send confidential and sensitive information to any “xxx.gsx.gov.uk” type address listed above.
5. If any message contains a single address which is not shown above as being suitable (y) for exchanging confidential information it will be routed via the internet and could lead to compromising the confidential information. NHS Lothian staff should therefore not use the “reply to all” function in email unless certain that all addresses are suitable.
6. The only connection suitable for confidential email exchanges between Police Scotland are nhs.net addresses, not between addresses at 1, 2 or 3 above and Police Scotland.
7. Other NHS Health Boards may not agree to a reciprocal agreement on exchanging sensitive and confidential material except between two nhs.net addresses.
8. Email between @nhs.net to @nhs.net is recommended
9. Email between @nhslothian.scot.nhs.uk, @lothian.scot.nhs.uk and @luht.scot.nhs.uk and vice versa is recommended
10. @nhs.net to @nhslothian.scot.nhs.uk, @lothian.scot.nhs.uk and @luht.scot.nhs.uk and vice versa will be permitted. Note other Health Boards may not agree with this policy.
11. Email between @nhslothian.scot.nhs.uk, @lothian.scot.nhs.uk and @luht.scot.nhs.uk and @edin.sch.uk, @educ.edin.gov.uk, @ea.edin.sch.uk City of Edinburgh Council education are permitted.