

BRING YOUR OWN DEVICE POLICY

In this policy:

‘Council Members’ means all elected and co-opted members of the Parish Council
‘Devices’ means computers (desktop and laptop), tablets, smartphones and external hard drives.

‘Parish Council Business’ means any activity undertaken in the role of member of the Parish Council.

‘Personal Data’ has the meaning set out in Article 4(1) of the General Data Protection Regulation: “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”

‘Personally owned’ means ownership of a Device by a person or legal entity which is not the Parish Council

1. Introduction and Background

Swindon Parish Council recognises that council members have to use personally owned electronic devices for parish council business, whether that is at home or at meetings. Such devices include laptops, smart phones and tablets. This practice is commonly known as ‘bring your own device’ or BYOD which the parish council supports.

The use of such devices to create and process council information and data creates issues that need to be addressed, particularly in relation to data protection, information security and GDPR compliance. The parish council must ensure that it remains in control of the data for which it is responsible, regardless of the ownership of the device used to carry out the processing of personal data.

This policy is intended to protect the security and integrity of personal data controlled and processed by Swindon Parish Council. Swindon Parish Council Members must agree to adhere to the terms and conditions set out in this Bring Your Own Device (BYOD) policy in order to receive and process Council data on their devices.

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2. Security

Most data to enable council business to be conducted is provided to Council Members via email. All councillors must use their dedicated Swindon Parish Council email with the 'name'@Swindon-pc.gov.uk address. The use of personal emails is not permitted for council business.

- In order to prevent unauthorised access, personal devices must be password protected using strong passwords.
- Passwords must be kept confidential and must not be shared with family members or third parties.
- Passwords must be changed if it is disclosed to another person or discovered.
- Devices must lock if left idle for 5 minutes or more.
- Home Wi-Fi networks must be encrypted and secure.
- Devices must have appropriate and up to date anti-virus and anti-malware software.
- Caution must be exercised if public Wi-Fi networks are used.
- Care must be taken to avoid using devices in a manner which could pose a risk to confidentiality – such as clicking on links in suspicious emails, accessing potentially harmful websites or using potentially harmful application software.
- Personal data must not be used by any person for any other purpose than that for which it has been provided.
- Personal data received for the purposes of Parish Council business must not be shared with any other person or organisation.
- Data must only be stored on internal memory, never on a removable memory cards and deleted once its purpose is met.
- Any remaining emails and correspondence must be deleted after 2 years unless a longer period is necessary to fulfil the purpose outlined in the council's privacy notice.
- Councillors will undertake training as required to keep abreast of relevant risks such as phishing attacks, spam etc.

Risks/Liabilities/Disclaimers

- All data relating to Swindon Parish Council must be permanently erased at the end of a Councillor's term.
- Any Data breaches must be immediately reported to the Clerk and dealt with in accordance with the council's Data Breach Policy.

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- Any lost or stolen devices must be immediately reported to Swindon Parish Council. Councillors are responsible for notifying their mobile carrier immediately upon loss of a device.
- Councillors agree to adhere to Council's BYOD policy as outlined above.
- Councillors are personally liable for all costs associated with his/her device.

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