NEWENT TOWN COUNCIL and BURIAL AUTHORITY

BRING YOUR OWN DEVICE POLICY

(Adopted on 27th February 2023; to be reviewed annually)

Interpretation

'Members'	means all elected and co-opted members of the Council and any Committee or Sub-Committee of the Town Council.
'Devices'	means computers (desktop and laptop), tablets, smartphones and external hard drives.
'Town Council Business'	means any activity undertaken in the role of member or employee of the Town 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 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 Town Council

1. Purpose

The purpose of this policy is to ensure as far as possible that personally owned devices used by Members to conduct town council business are used in manner which protects Personal Data.

2. Risks

Staff employed by the Town Council only use devices provided by the Town Council and no personal devices are used. Access and safe usage measures are practised; therefore, no further action is required.

There are inherent risks in Members using personally owned devices to undertake town council business.

The risks inherent in using personally owned devices to conduct town council business has been identified:

Event/Action	Risk
Inadequate or lack of appropriate security measures used to control access to Device	Personal Data may be accessible to third parties
Device used in an insecure manner	Device could be affected by malware which could result in Personal Data being accessed by third parties
Device lost or stolen	Personal Data may be accessible to third parties
Device sold or given away	Personal Data may be accessible to third parties unless Device appropriately cleared before transfer
Clerk ceases to be employed by the Town Council or Councillor ceases to be member of the Town Council	Personal Data may remain accessible via the Device and could be used for unauthorised purpose or disclosed to third parties

It is advised against councillors conducting business through their personal email addresses.

The Town Council staff will not email councillors on their personal email addresses.

Councillors must use their .gov.uk emails allocated to them by the Town Council.

3. Access to Devices

Devices used for town council business must be secured by a password or a biometric access control such as fingerprint recognition.

Passwords must comply with the following rules:

- Passwords should not be written down.
- A different password should be used for each and all devices or email accounts.
- Passwords must not be disclosed to any other person. If a password is disclosed to any other person, whether deliberately or inadvertently, it must be changed immediately.
- Passwords should be changed at least every 12 months.
- Passwords should be a complex mix of letters and symbols, at least 7 characters long.

Devices used by one or more persons must have a separate user profile for the Councillor, Committee Member, secured as above and which cannot be accessed by any other person.

Devices must be configured to automatically lock if left for more than five minutes in the case of smartphones, tablets or laptops and ten minutes in the case of desktop computers.

4. Safe usage of devices

Devices must have appropriate and up to date anti-virus and anti-malware software.

Home Wi-Fi networks must be encrypted.

Care should be exercised if using public Wi-Fi to connect Devices.

5. Retention and Use of Personal Data

Personal Data received for the purposes of town council business and accessed via a personally owned device must be permanently deleted from the device or email account once the related Town Council business is completed.

Personal Data should not be retained on a device or in an email account in case it is needed for a different purpose in the future unless permission has been obtained to retain the data for general Town Council business or unless the Town Council is required by law to retain the Personal Data.

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 town council business must not be shared with any other person or organisation.

6. Lost or stolen devices

In the event a device is lost or stolen, or is suspected of having been lost or stolen, the Town Clerk must be informed as soon as possible.

The Town Clerk will work with the owner of the lost or stolen device to identify any personal data at risk and will then take appropriate action, including reporting any breach to the ICO as necessary.

7. Repair of device

If a device needs to be repaired, the owner will take all reasonable steps to ensure that the repairer cannot access any Personal Data.

8. Transfer or disposal of devices used for town council business

If the owner wishes to transfer or dispose of a device which has been used for town council business all Personal Data must be deleted from that Device using a method which prevents recovery.

Any email accounts used by the Member for town council business should be deleted from the device.

9. Leaving the Town Council

If a Member ceases to be a Councillor or co-opted member of a committee of sub-committee Town Council for any reason:

- All Personal Data received in the course of town council business must be permanently deleted from the Device and from any email account used for town council business; and
- All hard copies should be shredded or passed to the Town Clerk for destruction.

On the termination of staff employment by the Town Council:

- Any devices issued by the Town Council must be returned immediately.