

Data Security and Bring Your Own Device Policy

Sedgefield Town Council

This data security and bring your own device policy sets out the procedures we have put in place to maintain the security of personal data and other data within our organisation.

We are Sedgefield Town Council, a council in England. Our contact details are Sedgefield Town Council, Council Offices, 13 Front St, Sedgefield, County Durham, TS21 3AT.

We are a data controller for personal data as defined by all applicable data protection and privacy laws including, but not limited to, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "UK GDPR"), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation (the "Data Protection Legislation").

This policy is binding on all employees, members and volunteers ("User" or "Users") of Sedgefield Town Council ("The Organisation") in order to protect Personal or other Data ("Personal Data" or "Data") processed by the organisation.

It applies to all organised filing systems be they computer based, paper based or any other such method of organising information which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis ("Filing Systems").

1. Person Responsible

- 1.1. The Town Clerk is responsible for the ongoing compliance monitoring of this and other policies that are designed to achieve compliance with the Data Protection Legislation. ("the person responsible for data protection").
- 1.2. No user within the organisation shall deviate from this policy without written authorisation from the person responsible for data protection.

2. Acceptable Use

- 2.1. Data shall only be used within the organisation for the purposes of the organisation.
- 2.2. Data shall not be shared with third parties or other data controllers without a data sharing agreement having been finalised and signed by the person responsible for data protection.
- 2.3. Only data processors that have contracts with the organisation that have been authorised by the person responsible for data protection shall be used.
- 2.4. Users processing data on behalf of the organisation are reminded of the need to keep proper records in accordance with this and other policies designed to maintain compliance with the data protection legislation and the freedom of information act.

3. Passwords

- 3.1. Users processing data on behalf of the organisation on systems that require passwords shall use a password that conforms to the following:
 - 3.1.1. Is sufficiently complex and is made up of at least three random unconnected words.

Version:	Adopted:	Officer Responsible:	Review Date:
1.0.	20.04.2026	Dr Jane Ayre, Town Clerk	March 2027

- 3.1.2. Is not used for other logins be they personal or professional.
- 3.1.3. Is not disclosed to anyone or written down.
- 3.2. Passwords must not be shared amongst the organisation's users. If a user has a legitimate need for data that they cannot access with their own password then the person responsible for data protection should be advised so that access levels may be changed if appropriate.
- 3.3. Users should be aware that no one will ever ask a user for their password. Any request for a password to be disclosed should be reported to the person responsible for data protection immediately.
- 3.4. Where multi-factor authentication is available, it shall be used.
- 3.5. Multi-factor authentication codes must not be disclosed to others or shared amongst the organisation's users.
- 3.6. Users should be aware that no one will ever ask a user for a multifactor authentication code. Any request for a multifactor authentication code to be disclosed should be reported to the person responsible for data protection immediately.

4. Email

- 4.1. The organisation does not allow users to process the organisation's data using their own personal email accounts unless prior authorisation has been given by the Town Clerk in matters deemed necessary for the continuation of the council's operations.
- 4.2. The organisation does allow users to access email accounts provided by the organisation using their own personally owned computers, laptops, or other mobile devices but the organisation's data must remain with the organisation's cloud based email system and not be downloaded onto the device in question (if the information is accessible when the device in question is not connected to the internet then the data will have been downloaded on to the device).

5. Social Media and Instant Messaging

- 5.1. The organisation's data shall not be uploaded, posted or otherwise transferred to social media (including but not limited to Facebook, X (formally Twitter), Instagram, TikTok, YouTube) without the authorisation of the person responsible for data protection.
- 5.2. The organisation's data shall not be uploaded, posted or otherwise transferred to instant messaging or collaboration services (including but not limited to Whatsapp, Teams, Skype, Facebook Messenger, Slack, Google Workspace) without the authorisation of the person responsible for data protection.
- 5.3. Social media, instant messaging and collaboration services that are authorised for use in the organisation are listed in appendix A.

6. Physical Security

- 6.1. No servers are present on site, all data is cloud-based.
- 6.2. Computers shall not be left unattended without the screen being locked or the user logged out.
- 6.3. Paper files shall be kept in locked filing cabinets where possible and always when containing special personal data. All paper files are stored in rooms located beyond a security door, preventing access to the public or unauthorised visitors.

Version:	Adopted:	Officer Responsible:	Review Date:
1.0.	20.04.2026	Dr Jane Ayre, Town Clerk	March 2027

- 6.4. Documents no longer required shall be disposed of via secure means such as cross cut shredding or commercial document destruction.
- 6.5. Where documents are disposed of by commercial document destruction they shall be disposed of securely and a certificate of destruction obtained.

7. System Security

- 7.1. Users of the organisation's data shall be granted the appropriate level of access to cloud or computer systems to allow them to undertake their duties.
- 7.2. No member of staff has administrator rights or access to administrator controls, this role is held by the town council's IT provider.
- 7.3. All work-related computer files and records shall be kept within the organisation's cloud storage system.
- 7.4. USB sticks and other removable media shall not be used on the organisation's computer system with the exception of the transfer of imagery and video from a camera device, if there is no way of direct, wired transfer.
- 7.5. Storage media on servers shall be encrypted by the town council's IT provider.
- 7.6. Cloud servers are backed up by the town council's IT provider in 2 separate locations off site.
- 7.7. Backups shall be subject to twice yearly recovery testing to ensure that they are fit for purpose.
- 7.8. Software including operating systems shall be regularly kept up to date and patched with the latest security updates from its developers, by the town council's IT provider.
- 7.9. WiFi networks shall have a minimum WPA2 encryption standard if they are used to transmit data.
- 7.10. Public WiFi provided by the organisation shall be firewalled in such a way that the organisation's data is segregated from it.
- 7.11. Suitable anti virus software and anti malware software shall be used on all of the organisations computers, laptops or other mobile devices.
- 7.12. The organisation does not allow users to join their own personally owned computers, laptops, or other mobile devices to the organisation's computer network used for processing data.
- 7.13. When electronic documents, files or records are no longer required they shall be deleted in such a way as to put the data beyond use. Data will be deemed to be put beyond use if:
 - 7.13.1. The data is not able to be used to inform any decision in respect of any individual or in a manner that affects the individual in any way, and
 - 7.13.2. The organisation does not give any other organisation access to the data, and
 - 7.13.3. The organisation surrounds the personal data with appropriate technical and organisational security, and
 - 7.13.4. The organisation commits to permanent deletion of the information if, or when, this becomes possible.

Version:	Adopted:	Officer Responsible:	Review Date:
1.0.	20.04.2026	Dr Jane Ayre, Town Clerk	March 2027

8. Breaches

- 8.1. Any suspected breach of the confidentiality integrity or availability of personal data within our organisation shall be immediately and within 3 hours notified in writing to the person responsible for data protection.
- 8.2. Breaches of the confidentiality, integrity or availability of personal data within our organisation shall be investigated immediately by the person responsible for data protection and a determination made as to the level of risk of data being breached, the number of individuals involved, the severity of any breach and if the Information Commissioner's Office should be notified. This investigation must take a maximum of 72 hours from the first discovery of the breach.
- 8.3. No user should try to rectify a breach without first informing and getting authorisation from the person responsible for data protection.

9. Updates to this policy

- 9.1. This policy shall be reviewed annually.
- 9.2. This policy shall be reviewed if Sedgefield Town Council makes changes to the organisations Privacy Notice or if there are changes to how the organisation processes data or the data protection legislation changes.

Version:	Adopted:	Officer Responsible:	Review Date:
1.0.	20.04.2026	Dr Jane Ayre, Town Clerk	March 2027

Appendix A - Social media, instant messaging and collaboration services that are authorised for use in the organisation

Company	Product	Processor or controller	Reason
X Corp.	X	Processor	Social Media.
Microsoft	Microsoft Teams	Processor	Video meetings within the network and with external contacts e.g. training.
Zoom	Zoom	Processor	Training delivered by external contacts.
Microsoft	Office 365	Processor	Day-to-day operations, emails and document creation.
Microsoft	Sharepoint	Processor	Sharing The Sedgefield Plan evidence base on the town council's website.
Intuit Inc.	Mailchimp	Processor	'Residents Database' email group sharing council news and information electronically.
WordPress	WordPress	Processor	Town Council's website.

*The town council may also use survey websites in the future to collate answers to community surveys and questionnaires. No services or websites are currently being used to carry out community engagement surveys.

Version:	Adopted:	Officer Responsible:	Review Date:
1.0.	20.04.2026	Dr Jane Ayre, Town Clerk	March 2027