

Data Security and Bring Your Own Device Policy

Hughenden Parish Council

This interim 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 Hughenden Parish Council a council in England. Our contact details are Hughenden Parish Council, Council Office, The Common, Great Kingshill, High Wycombe, HP15 6EN tel: 01494 715296, email: clerk@hughenden-pc.gov.uk

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, councillors and volunteers ("Users") of Hughenden Parish Council, ("The Organisation") in order to protect Personal or other Data ("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 Parish 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. Email

- 3.1. The organisation does not allow users to process the organisation's data using their own personal email accounts.
- 3.2. 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 (if downloaded to a personal device) must only be viewed and shared by members and employees of Hughenden Parish Council.

4. Social Media and Instant Messaging

- 4.1. The organisation's data (see 8.1 definitions) shall not be uploaded, posted or otherwise transferred to blogs, vlogs or other social media (including but not limited to Facebook, Twitter, Instagram, TikTok, YouTube) without the authorisation of the person responsible for data protection.
- 4.2. 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. Breaches

- 5.1. Any suspected breaches of the data protection legislation shall be immediately and within 1 hour notified in writing to the person responsible for data protection.
- 5.2. Breaches of the data protection legislation 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.
- 5.3. No user should try to rectify a breach without first informing and getting authorisation from the person responsible for data protection.

6. Updates to this policy

- 6.1. This policy shall be reviewed annually by the person responsible for data protection.
- 6.2. This policy shall be reviewed if Hughenden Parish 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.
- 6.3. This policy was last updated on 9th June 2023.

7. Implementation

7.1. This policy takes effect from 9th June 2023 and is not retroactive.

8. Definitions

8.1 Data applies to all sets of personal data, currently stored, maintained and handled by Hughenden Parish Council, including but not limited to Councillors, Officers, Contractors, Staff, and members of the public.

This data includes but is not limited to any information, emails, instant message conversations, documents and post circulated within the data control walls of Hughenden Parish Council (data control walls being the Council Offices, the Council Website, The Council's 365 subscription and approved .gov.uk email accounts)

Personal data herein referred to, means any information relating to a natural person who is or can be identified, directly or indirectly, by reference to a job title or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. This can include in particular: Names of individuals, Postal or living addresses, Email addresses, Telephone numbers, Identity card and passport, Date and place of birth.