



MEETING PAPER

Subject: Access to LTC emails on personal devices

Meeting: Finance and Governance Committee

Date: 13th August 2024

~~CONFIDENTIAL~~/NON CONFIDENTIAL

Background/Introduction

Officers do not recommend the councillors access their Town Council emails on personal devices. The reasonings behind this are as follows:

1. **IT Policy** - This would be against the Town Council's IT Policy which, at point 9.1 states "*Councillors are required to use a Town Council-owned laptop as part of their tenure...*".

By providing laptops for all councillors, the Town Council can ensure a uniformed approach to handling of Town Council correspondence and documents, with suitable training on how to use the devices and associated software provided.

2. **Security** - There would also be an increased security risk with using personal devices. Section 6 of the Town Council's IT Policy covers Security and states:
 - (6.1) You must adhere to the Town Council's password regulations. **You must never provide inappropriate access to Town Council/work-related passwords to any other individual.** (*emphasis added – the risk with personal devices is that these can be shared amongst multiple users (family-computer, joint mobile phone etc.)*)
 - (6.2) You are also responsible for the security of your allocated device and **you must ensure that it is not used by unauthorised people.** (*emphasis added – see above*).
 - (6.3) If you are provided with use of a device, it is considered of the utmost importance that you ensure there is appropriate and **sufficient security of any sensitive or confidential data.** (*emphasis added – the Town Council is aware of the security of its own devices whereas any personal devices may not be as up-to-date with security*).

It is worth noting that the devices which are managed by the Town Council are regularly updated with the latest security software. One such feature includes the ability to remotely make a device inactive (or wiped) in the case of it being lost or being taken abroad. This feature would not be present on a

personal device with personal devices being more at risk of being lost, especially if these are taken abroad on holiday etc.

- 3. Freedom of Information Requests** – Any data controlled by the Town Council is subject to Freedom of Information (FOI) requests or Subject Access Requests (SARs). In the event of an FOI request or SARs coming in, it may be necessary for a councillor to provide access to their devices to facilitate the request. If a personal device is used to access Town Council information (such as emails or documents), this would also need to be handed over for up to 28 working days, with access given, as part of the request.
- 4. Data Protection** – The Town Council, working with its' IT Providers, are actively engaged in data protection and ensuring that our use of data is compliant with the Data Protection Act 2018. Such measures are built into the Town Council's IT Policy as well as its' own Data Protection Policy.

Extra attention should be paid to ensuring that any documents or information from, or pertaining to, the Town Council are kept secure. Point 6.4 of the Town Council's IT Policy states, "*Councillors should not download any Town Council or Town Council related data on to any removable storage device without prior agreement with the Town Clerk.*" The IT Policy further states:

(9.2) "On resignation of a Councillor, end of term of office or at any point by request of the Town Clerk, the councillor must return any IT equipment, software and related accessories"

and;

(9.3) "All IT equipment, software, data, related contracts and accessories, provided by the Town Council, remains the property of the Town Council. All data contained on any IT equipment is the property of the Town Council and the Town Council reserves the right to own, control and interrogate that data."

These two points would allow for the Town Council to request access to a councillors' personal device to ensure that any data is being used correctly and, if necessary, wiped.

Recommendations

Bearing in mind the security issues and data protection issues with accessing LTC emails on a personal device, Officers would strongly recommend that this item is not considered.