Beech Parish Council

Information Security Policy

Adopted 23rd October 2023

Agenda item 12 ii), minute reference 23.125

Additional responsibilities for Parish Councillors:

1. I will only use my Parish Council email account for Parish Council correspondence.
    1. I will not forward Parish Council’s emails to my personal email account without the Parish Clerk’s permission and I understand that doing so may be a breach of the Data Protection Act and Computer Misuse Act.
    2. I understand that my personal emails are subject to Freedom of Information Requests/ Subject Access Requests if they relate to Council business and that it is a criminal offence to block the release of data
2. I will ensure that all devices (computers, laptops, phones, etc.) I use for Parish Council business have appropriate security controls:
    1. ‘Strong’ and unique password protection for Parish Council email accounts
        - Strong passwords use a combination of letters, numbers, cases, and symbols to form an unpredictable string of characters that doesn't resemble words or names.
        - Unique Passwords. A strong password should be unique to each account to reduce vulnerability in the event of a hack.
    2. Operating system automatic software updates to maintain currency.
    3. Appropriate antivirus software and firewall.
    4. Two factor authentication for financial transactions.
3. I will inform the Parish Clerk of any:
    1. Potential security breach within 24 hours; For example, unexplained usage of a Parish Council email address
    2. Any accidental access to, or receipt of inappropriate materials.
4. Where possible I will avoid holding any Parish Council information in my home or on my own personal devices:
    1. I will store digital information in the appropriate folder of the Parish council filing system.
    2. I will avoid emailing documents as attachments and instead use the appropriate (edit or read only) level of ‘share’ to the Parish council filing system.
    3. I will ensure all documents are saved, accessed, and deleted in accordance with the Parish Council’s policy.
    4. I will not share personal or confidential information supplied by the Parish Council or residents where appropriate approval or consent has not been given.
    5. I will store any personal data on behalf of the Parish Council in a secure environment.
5. When working with non-Councillors on sub-committees and working groups
    1. I will ask the Parish Clerk to share access to the appropriate subfolder of our Parish council filing system with them.
    2. I will ensure that the sub-committee or working group avoid emailing documents as attachments and instead use links to the Parish council filing system.

Additional responsibilities for the Parish Clerk

Data Protection and administration

The Clerk has overall responsibility for ensuring that the Parish Council complies with all relevant data protection obligations and acts as the representative of the data controller on a day-to-day basis.

1. Data Protection Officer

- a. The Parish Council is not required to employ a Data Protection Officer (DPO). The Parish Clerk will maintain responsibility for overseeing the implementation of our Data Protection policy, monitoring the compliance with data protection law, and developing related policies and guidelines where applicable.

2. The Data Controller

- a. The Data Controller is the person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are or are to be processed. Beech Parish Council is the Data Controller for all personal data relating to its members, employees, residents, suppliers and any other individuals.

3. System administration

- a. The Clerk has overall responsibility for enabling appropriate access to our filing system, including:
  1. Creation, maintenance and deletion of Parish Council email accounts.
  2. Maintenance of our Parish council website pages.
  3. Creation and maintenance of the shared file system and underlying folder structure.
  4. Grant and revoke ‘shares’ to the appropriate folders in the shared file system to Parish Councillors and others nominated to sub-committees and working groups.
  5. Ensure non-Councillors nominated to sub-committees and or working groups complete and return a ‘Information Security policy acceptance’ prior to enabling access to the relevant subfolder.

Additional responsibilities for other individuals granted access to the shared file system

Information Security Policy acceptance:

1. I have reviewed and will comply with the relevant Beech Parish council policies:
    1. Information Security Policy.
    2. The use of social media is set out in Beech Parish Council Social Media Policy.
    3. Specific data protection requirements for ‘personal data’ in our GDPR General Privacy Notice for Staff, Councillors and Role Holders.
    4. The management and use of roadside cameras and their data as set out in our AutoSpeedWatch Camera Policy
2. I understand that my personal emails are subject to Freedom of Information Requests/ Subject Access Requests if they relate to Council business and that it is a criminal offence to block the release of data.
3. I will ensure that all devices (computers, laptops, phones, etc.) I use for Parish Council business have appropriate security controls:
    1. ‘Strong’ and unique password protection for email accounts
        1. Strong passwords use a combination of letters, numbers, cases, and symbols to form an unpredictable string of characters that doesn't resemble words or names.
        2. Unique Passwords. A strong password should be unique to each account to reduce vulnerability in the event of a hack.
    2. Operating system automatic software updates to maintain currency.
    3. Appropriate antivirus software and firewall.
4. I will inform the Parish Clerk of any:
    1. Potential security breach within 24 hours; For example, unexplained usage of a email address.
    2. Any accidental access to, or receipt of inappropriate materials.
5. Where possible I will avoid holding any Parish Council or individual’s information in my home or on my own personal devices.
    1. I will store any digital information in the appropriate folder of the Parish council filing system.
    2. I will avoid emailing documents as attachments and instead use the appropriate (edit or read only) level of ‘share’ to the Parish council filing system.
    3. I will ensure all documents are saved, accessed, and deleted in accordance with the Parish Council’s policy.
    4. I will not share personal or confidential information supplied by the Parish Council or residents where appropriate approval or consent has not been given.
    5. I will store any personal data on behalf of the Parish Council in a secure environment.

Name	Email address	Signature	Date	Expiry date

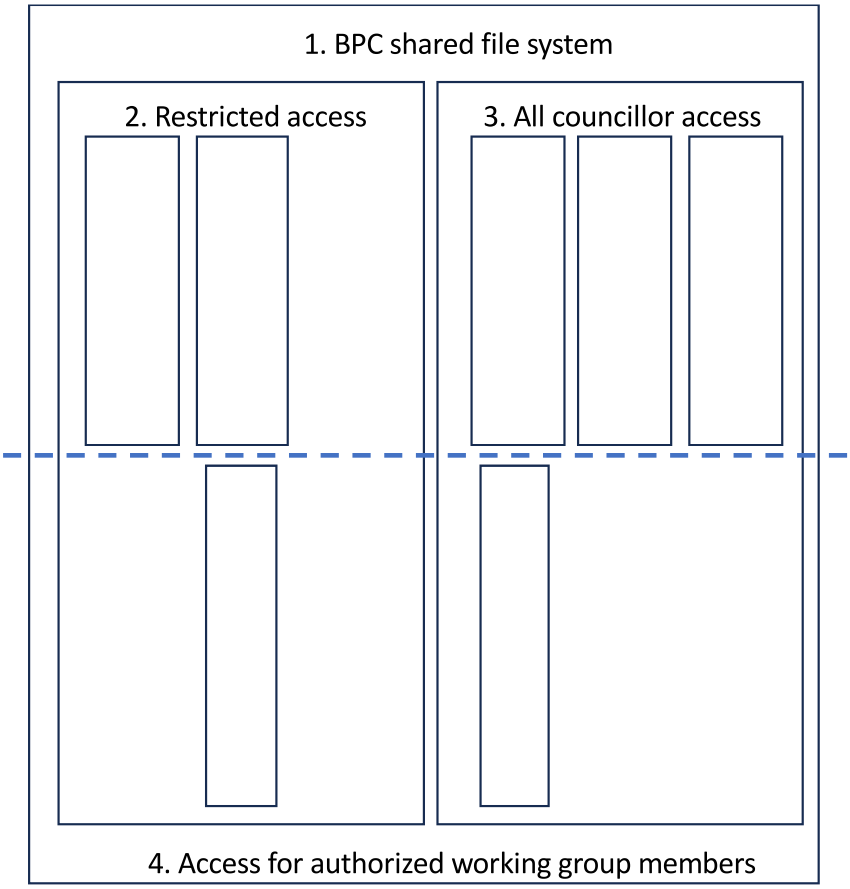
Shared file system design and access

The aim of the shared file system is to enable:

1. Easy navigation, access and filing of documents for authorized users.
2. A simple way to grant, limit and revoke access to specified topics for ‘temporary’ users.
3. Flexibility to support new topics decided by the council.
4. A secured area for documents that will have limited sharing between Councillors.
5. An archive.

Design

The shared file system is based on existing within a hierarch of folders. The folder hierarchy determines the ability to access a file.


1. BPC shared file system
2. Restricted access
3. All councillor access
4. Access for authorized working group members

Access and the use of ‘sharing’

1. BPC shared file system:
    a. The overall file system is ‘owned’ by the Parish Clerk who grants and removes access at a folder and subfolder level using the ‘share’ function of the filing system.
    b. The system is ‘hierarchical’, once access is ‘shared’ at a folder level all subfolders below are also shared.
    c. The file system is owned by the clerk and has 2 main folders:
        i. Restricted access.
        ii. All Councillor access.
    d. Only the Parish Clerk will share folder access to any individual.
    e. Parish Councillors may share file but not folder or subfolder access
        i. When ‘sharing’ individual files Parish Councillor’s will use the ‘Share with Google drive’ option and use the appropriate level of access control’.
            1. Restricted: Only people with access can open the file

            a. This is the default option and the alternative of ‘Anyone with the link’ should not be used.
        2. View, Editor or Comment
            a. ‘Editor’ is the default but ‘View’ should be used for any non-Parish Councillor communication.

2. Restricted access:
    a. The restricted access folder has subfolders for specific areas of council business that contain personal or other information where it is appropriates to limit access to specific individuals.
    b. The Parish Clerk will create and grant/remove access to individual Councillor’s to individual folders or subfolders.
        i. For example, a ‘Speed Camera’ subfolder with only selected individuals granted access to contain personal information collected by our speed cameras.
3. All Councillor access:
    a. The Parish Clerk will grant and remove access to the ‘All Councillor access’ subfolder to all Parish Councillors.
    b. The Parish Clerk will create subfolders in the ‘All Councillor access’ folder for specific areas of council business.
        i. For example:
            1. Policies and procedures
            2. Road Safety
            3. Speed cameras. There can be a ‘Speed Camera’ subfolder in the All Council folder as well as in the restricted access. This enables some information to be shared with all Councillors and some restricted.
        ii. By default, the ‘subfolder’ will be ‘owned’ by the Parish Clerk but ownership can be delegated to an individual Parish Councillor.
        iii. The Parish Clerk will not need to grant / revoke access to the individual folders as this is already enabled by their access to the ‘All Councillor access’ folder.
4. Access for authorized working group members
    a. For a subfolder in the ‘Restricted access’ or ‘All Councillor access’, the Parish Clerk can create a further lower level of subfolder to enable access to a limited set of information only within that area.
    b. The Parish Clerk will manage access by
        i. Confirming with the ‘owner’ of the specific subfolder the validity of the access request.
        ii. Ensuring that any non-Councillor first completes and returns a signed and dated ‘Information Security Policy acceptance’ prior to access.
        iii. Confirming with the ‘owner’ of the subfolder.
    c. The Parish Clerk can then create a subfolder to the ‘Speed Camera’ subfolder and grant access to the subfolder only to authorized members of the ‘Speed Camera working group’ to store speed camera data.

How to access and use the shared file system

Parish Councillor access

1. Each Councillor to ensure they have access to their Parish Council email id
    1. Please email me if you need help
2. Each Councillor to create a Google account using their Beech Parish council email id:\
    1. The account type is 'For myself'
    2. **You should use your Parish Council email addeews. Tip:** You don't need a Gmail account to create a Google Account. You can use your non-Gmail email address to create one instead.
3. Once you have created your Google account with your Parish Council email address please email the Parish Clerk to confirm.
4. Optionally each Councillor can then install 'Google Drive' on their device(s)
    1. By default you can access Google drive from a web browser
    2. In additon you can install 'Google Drive' on your device(s). This will enable you to work 'offline'.

Usage and training

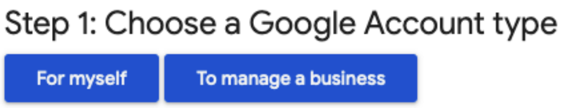
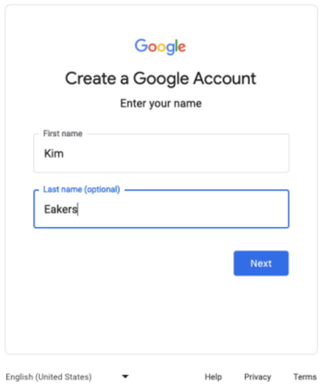
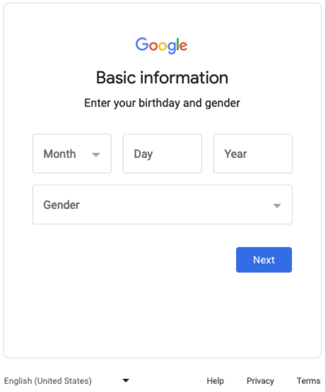
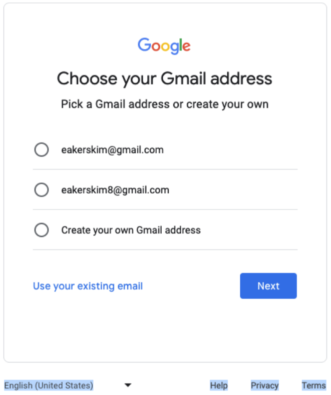
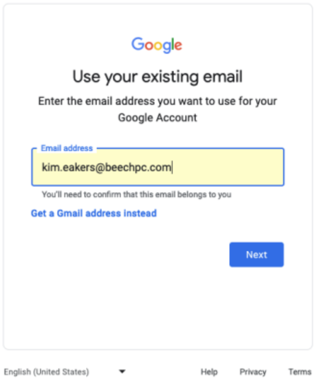
As per our meeting our policy is based on

1. Only the Parish Clerk is permitted to 'share' folders
2. Councillors are permitted to 'share' documents but must always consider how these will be used and further shared and take the appropriate options when using the 'share' option

In order to use the shared file system we will need some training:

1. Revew: How to share files from Google Drive
2. Watch this 10 minute video on how to 'share' files

How to create a Google account:

Click on this link to start to create a Google account And then choose the type of account as ‘For myself’:  Step 1: Choose a Google Account type For myself To manage a business The system will then ask you to enter your first and last name:	 Create a Google Account Enter your name First name: Kim Last name (optional): Eakers Google Next English (United States) Help Privacy Terms
The system will then ask you to enter your birth date and gender:	 Basic information Enter your birthday and gender Google Month Day Year Gender Next English (United States) Help Privacy Terms
The system then asks you to choose your Gmail address. You must click the text that says: ‘Use your existing email’	 Choose your Gmail address Pick a Gmail address or create your own ○ eakerskim@gmail.com ○ eakerskim8@gmail.com ○ Create your own Gmail address Google Use your existing email Next English (United States) Help Privacy Terms
You will now be able to enter your Beech Parish Council email address: The system will then attempt to validate this email address. - It is important you have already set up access to your Beech Parish Council email address.	 Use your existing email Enter the email address you want to use for your Google Account Email address: kim.eakers@beechpc.com You'll need to confirm that this email belongs to you Google Get a Gmail address instead Next English (United States) Help Privacy Terms