

# USE YOUR OWN DEVICE POLICY

**Document Owner:** Data Protection Officer

**Date:** March 2022

**Status:** Non-statutory



|   |   |  |   |   |
|---|---|--|---|---|
| <b>Document Type</b>                                | Use Your Own Device Policy  |  |   |   |
| <b>Reference/Version Number</b>                     | CLT-YOD-V1.1  |  |   |   |
| <b>Summary</b>                                      | The City Learning Trust (Trust) and Member Academies recognise the benefits that can be achieved by allowing staff to use their own electronic devices when working, whether that is at home, on any of our Trust sites or when travelling. Such devices include laptops, smart phones and tablets and the practice is commonly known as 'use your own device' or UYOD. |  |   |   |
| <b>Associated Documents</b>                         | • Data Protection Policy  |  |   |   |
| <b>Target Audience</b>                              | All Employees, Governors, Trustees and Volunteers   |  |   |   |
| <b>Date of this Version</b>                         | March 2022  |  |   |   |
| <b>Document Owner</b>                               | Data Protection Officer   |  |   |   |
| <b>Review Body</b>                                  | Policy Admin Group  | <b>Meeting Date</b>                              | 15.7.21<br>16.3.21                                |   |
|   |   | <b>Meeting Date</b>                              |   |   |
| <b>Union Consultation Date/s:</b>                   | N/A   | <b>Meeting Date</b>                              | N/A   |   |
| <b>Proof Read</b>                                   |   |  |   |   |
| <b>Senior Leadership Team</b>                       | N/A   |  |   |   |
| <b>Approved/Ratified by</b>                         | Board of Trustees   | <b>Meeting Date</b>                              | 14.12.20<br>4.4.22                                |   |
|   |   | <b>Next Review Date</b>                          | March 2024  |   |
| <b>Signature of Chair of Trustees</b>               |   |  |   |   |
| <b>Date uploaded on website/s</b>                   |   |  |   |   |
| CLT   | Haywood   | Trentham   | Mill Hill   | Smallthorne   |
| <b>Date uploaded to Sharepoint/s</b>                |   |  |   |   |
| CLT<br>V1.0 13.10.21<br>V1.1 - 6.6.22               | Haywood<br>V1.0 11.12.20 15:14<br>V1.1 - 7.6.22   | Trentham<br>V1.0 11.12.20 15:14<br>V1.1 - 7.6.22 | Mill Hill<br>V1.0 11.12.20 15:14<br>V1.1 - 7.6.22 | Smallthorne<br>V1.0 11.12.20 15:14<br>V1.1 - 7.6.22 |
| <b>Acknowledged by Local Governing Committee/s:</b> |   |  |   |   |
| <b>Acknowledged by Local Governing Committee/s:</b> | Haywood<br>1.12.20<br>29.3.22   | Trentham<br>2.12.20<br>30.3.22                   | Mill Hill<br>18.11.20<br>23.3.22                  | Smallthorne<br>18.11.20<br>23.3.22                  |

## VERSION CONTROL

| Version No: | Type of change   | Date      | Revisions from previous version   |
|-------------|------------------|-----------|---|
| 1.0         | New Document     | Sept 2020 | New Policy  |
| 1.1         | Bi-annual review | Mar 2022  | Section 3 updated with additional policies<br>UK added to GDPR references |
|             |                  |           |   |
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## TABLE OF CONTENTS

|   |   |
|---|---|
| VERSION CONTROL   | 2 |
| 1. STATUS   | 4 |
| 2. INTRODUCTION   | 4 |
| 3. INFORMATION SECURITY POLICIES                        | 4 |
| 4. THE RESPONSIBILITIES OF STAFF MEMBERS                | 4 |
| 4.1 Staff using UYOD must take all reasonable steps to: | 4 |
| 4.2 Staff using the UYOD must:                          | 4 |
| 5. MONITORING AND ACCESS                                | 5 |
| 6. DATA PROTECTION AND UYOD                             | 5 |
| 7. MONITORING AND REVIEW                                | 5 |

## 1. STATUS

- a. Non statutory.

## 2. INTRODUCTION

- a. The City Learning Trust (Trust) and Member Academies recognise the benefits that can be achieved by allowing staff to use their own electronic devices when working, whether that is at home, on any of our Trust sites or when travelling. Such devices include laptops, smart phones and tablets and the practice is commonly known as 'use your own device' or UYOD. The Trust is committed to supporting staff in this practice and ensuring that as few technical restrictions as reasonably possible are imposed on accessing Trust and Member Academy services on UYOD.
- b. The use of such devices to create and process Trust information and data creates issues that need to be addressed, particularly with regard to information security.
- c. The Trust must ensure that it remains in control of the data for which it is responsible, regardless of the ownership of the device used to carry out the processing. We must also protect its intellectual property as well as empowering staff to ensure that they protect their own personal information

## 3. INFORMATION SECURITY POLICIES

- a. All relevant Trust policies still apply to staff UYOD. Staff should note, in particular, the Trust Information Security related policies.
- b. Records Management Policy
- c. UK General Data Protection Policy
- d. E-Safety Policy
- e. Remote Learning & Online Communication Acceptable Use Statement.
- f. IT and Social Media Policies

## 4. THE RESPONSIBILITIES OF STAFF MEMBERS

- a. Individuals who make use of UYOD must take responsibility for their own device and how they use it. They must:
  - i. Familiarise themselves with their device and its security features so that they can ensure the safety of Trust information (as well as their own information).
  - ii. Invoke the relevant security features.
  - iii. Maintain the device themselves ensuring it is regularly patched and upgraded.
  - iv. Ensure that the device is not used for any purpose that would not be compliant with the Trust's Policy on the Use of ICT & equipment.
- b. While City Learning Trust IT staff will always endeavour to assist colleagues wherever possible, the Trust cannot take responsibility for supporting devices it does not provide.

### 4.1 Staff using UYOD must take all reasonable steps to:

- i. Prevent theft and loss of data.
- ii. Keep information confidential where appropriate.
- iii. Maintain the integrity of data and information, including that on CLT sites
- iv. Take responsibility for any software they download onto their device.

### 4.2 Staff using the UYOD must:

- i. Set up passwords, passcodes, passkeys or biometric equivalents. These must be of sufficient length and complexity for the particular type of device.
- ii. Set up remote wipe facilities if available and implement a remote wipe if they lose their device.
- iii. Encrypt documents or devices as necessary. **Staff are requested to bring their device to IT Support team members for encryption**

- iv. Not hold any information that is sensitive, personal, confidential or of commercial value on personally owned devices.
- v. Where it is essential that information belonging to the Trust is held on a personal device it should be deleted as soon as possible once it is no longer required. This includes information contained within emails.
- vi. Ensure that relevant information is copied back onto Trust systems and manage any potential data integrity issues with existing information.
- vii. Report the loss of any devices containing Trust data (including email) to the Data Protection Officer.
- viii. Be aware of any Data Protection issues and ensure personal data is handled appropriately.
- ix. Report any security breach immediately to the Data Protection Officer and ensure personal data is handled appropriately.
- x. Ensure that no Trust information is left on any personal device indefinitely. Particular care must be taken if a device is disposed of/sold/transferred to a third party.

## **5. MONITORING AND ACCESS**

- a. The Trust will not routinely monitor personal devices. However, it does reserve the right to:
  - i. Prevent access to a particular device from either the wired or wireless networks or both.
  - ii. Prevent access to a particular system.
  - iii. Take all necessary and appropriate steps to retrieve information owned by the Trust.

## **6. DATA PROTECTION AND UYOD**

- a. The Trust and Member Academies must process 'personal data' that is data about identifiable living individuals in accordance with UK Data Protection Act 2018. Sensitive personal data is information that relates to race/ethnic origin, political opinions, religious beliefs, trade union membership, health (mental physical) or details of criminal offences. This category of information should be handled with a higher degree of protection at all times.
- b. The Trust and Member Academies, in line with the guidance from the Information Commissioner's Office on UYOD, recognises that there are inherent risks in using personal devices to hold personal data. Therefore, staff must follow the guidance in this document when considering using UYOD to process personal data.
- c. A breach of the Data Protection Act can lead to the Trust receiving a substantial fine. Any member of staff found to have deliberately breached the Act may be subject to disciplinary measures, having access to the Trust and Member Academies facilities being withdrawn, or even criminal prosecution.

## **7. MONITORING AND REVIEW**

- a. This policy has been approved by the Board of Trustees. It will be reviewed by the Policy and Procedures Working Group on a bi-annual basis to ensure continuing compliance.