Working Overseas

Procedure for Members

1 Introduction

1.1 This procedure sets out the steps Members should follow in order to safely and responsibly access the council network outside of the United Kingdom.

2 Accessing the council network overseas

2.1 Members should not access any council systems or emails whilst overseas without submitting a notification to Committee and Member Services, and to do so could raise data security risks.

2.2 Equipment used overseas includes laptops, tablets, smartphones, and any other devices that can store or access council data. Council applications and data include emails, documents, databases, and any other information that belongs to the council or is processed by the council.

2.3 The council is not the data owner for constituent enquiries, or any work carried out on behalf of political parties. Members are advised not to access this data via council devices or networks.

2.4 Members are advised against accessing council networks from any of the following countries:

- Afghanistan
- Belarus
- China
- Haiti
- Iran
- Lebanon
- Libya
- North Korea
- Russia
- South Sudan
- Syria
- Yemen

These are countries considered to have 'high-risk conditions' based on information from the European Commission adequacy decision as to whether a country offers an adequate level of data protection.

2.5 It is advised that Members will access the council network via a Council-owned device. Where this is not feasible Members can use a personal device with a VPN.

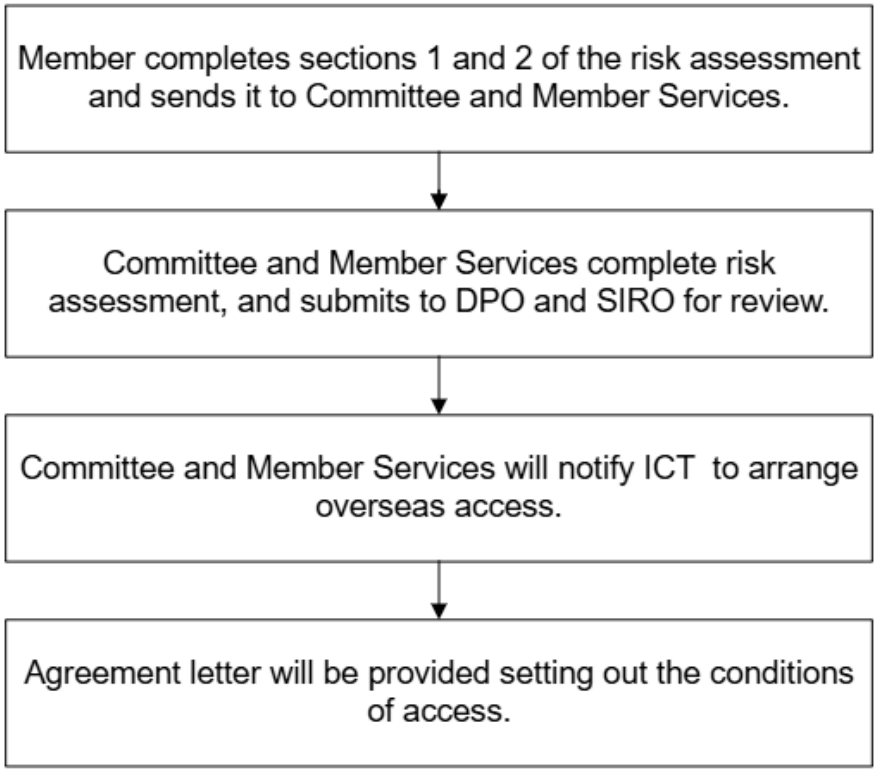
2.6 Overseas access to the council network will be arranged once a risk assessment (appendix 1) is completed and reviewed by the DPO (Director of Law, Governance and Strategy) and SIRO (Deputy Chief Executive City and Citizens' Services).

2.7 Should a data breach occur as a result of a Member's failure to follow this procedure, under the Data Protection Act 2018 individuals can be fined by the ICO.

2.8 Members will need to submit a new notification each time they need to use the council network overseas so that the restriction on UK-only access can be lifted.

3 Procedure

3.1 This flowchart sets out the procedure that must be followed:



3.2 To allow sufficient time for ICT to arrange for overseas access any requests should be confirmed seven days before travel.

4 Return to UK working

4.1 For the stated period that the member is abroad, they will not be able to access their council services whilst in the UK.

4.2 If a member returns to the UK early, they must notify ICT as soon as possible. ICT will adjust the access, which can take up to two working days.

4.3 ICT will automatically revoke overseas permissions after the approved period.

5 Monitoring and review

5.1 This procedure will be regularly reviewed.

6 Appendix 1 – Working Overseas Risk Assessment Form for Members

Section 1: Member details			
Name		Requested dates (from – to)	
Country they wish to access the council network from		Address when working abroad	
Section 2: Detail of the request			
What are the GDPR rules in the requested location? For information on a Countries adequacy status please check this site: Data protection adequacy for non-EU countries. What data will the member access whilst working overseas? Is any of it personal or sensitive data? As part of their working environment, how will they keep data secure and protect the confidentiality of any data or work conversations they may have? Does the Member need access to a council-owned device whilst overseas? If using a personal device does the Member have use of a VPN?			
Section 3: Consideration of risks and mitigations			
Risk	**Likelihood**	**Impact**	**Mitigating Action**
What is the risk?	*How likely is it to happen? (Unlikely – likely)*	*Consider the impact on the person, team, organisation and customers*	*What actions can be taken to reduce the likelihood of this risk occurring?*
Additional GDPR obligations in the overseas country	[Unlikely / likely]	[Low / medium / high]	
Sensitivity of data accessible	[Unlikely / likely]	[Low / medium / high]	

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Breach of OCC systems	[Unlikely / likely]	[Low / medium / high]	

DPO (Emma Jackman)	
Request supported	**YES / NO**
Comments:	
Signed	Date
Print name	

SIRO (Thomas Hook)	
Request supported	**YES / NO**
Comments:	
Signed	Date
Print name	

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