

Personnel Committee – 18th April 2018

Clear Desk and Screen Policy

1. Summary

The purpose of this report is to seek approval for a Clear Desk & Screen Policy (appendix 1).

2. Recommendations

That the Personnel Committee approve the Clear Desk & Screen Policy.

3. Background Information

- 3.1 The Council has an obligation to ensure that it is compliant with the General Data Protection Regulations (2018) in relation to the management and processing of personal data.
- 3.2 In order to support the General Data Protection Regulations (2018) the Council expects all employees, casual workers, agency workers, consultants and volunteers undertaking duties on behalf of the Council to protect council information and personal/sensitive data.
- 3.3 The Clear Desk & Screen Policy sets out the expected standards for all employees, casual workers, agency workers, consultants and volunteers undertaking duties on behalf of the Council.

4. Financial Implications

- 4.1 There are possible financial implications in relation to the availability of adequate secure storage facilities for the storage of council information and equipment. Where there are shortfalls the cost of purchasing such items will need to be picked up through service budgets. However, the Council should reallocate unused storage to the relevant areas before purchasing new equipment.

5. Legal Considerations

- 5.1 There is a risk to the Council if compliance with the General Data Protection Regulations (2018) is not met. Failure may result in damage to the reputation of the Council and therefore this policy sets the expected standards that will assist the Council to ensure compliance.

6. Citizen Impact

- 6.1 There is no direct impact on our citizens as a result of this procedure. The procedure however does protect Citizens privacy and provides reassurance information held by the Council is secure.

7. Equality implications

7.1 An equality impact assessment is attached (Appendix 2)

8. Consultation

8.1 The Clear Desk & Screen Policy has been circulated to Senior Managers and Trade Unions for consultation between 1st March to 7th March 2018. The procedure was presented to Corporate Management Team at its meeting on 29th March 2018 to be submitted for approval at Personnel Committee.

Author

Mike Smith
Senior HR Manager
12th March 2018
 655776
 mike.smith@walsall.gov.uk

Clear Desk & Screen Policy



Walsall Council

Version Control

Document title	Clear Desk and Screen Policy		
Owner	Human Resources		
Status	Draft	Version	0.4
Effective from	DD/MM/YYYY	Approved on	DD/MM/YYYY
Last updated	12/03/2018	Last updated by	HR Strategy and Planning
Purpose	The Clear Desk Policy sets guidelines to reduce the risk of security breaches, fraud and information theft.		

This procedure links to:

- Agile working Procedure
- Code of Conduct
- Data Protection Guidance for all staff
- Email and Internet Usage Procedure
- Records Storage Procedure
- Information Governance Policy Framework
- Protecting Information e-learning level 1 and 2
- Statement of Particulars

This list is not exhaustive.

For advice and guidance with this document, or if you would like this information in another language or format please contact:

The HR Operational Services Team on

Telephone 01922 655656

Text phone 01922 654000

Email HRDOperationalServices@walsall.gov.uk

1.0 Introduction

- 1.1 This policy is part of a set of information governance and council policies and procedures which sets out guidelines that aim to reduce the risk of security breach, fraud and information theft. The Council has an obligation to ensure that it is compliant with the General Data Protection Regulations (2018) in relation to the management and processing of personal data.
- 1.2 This policy has been developed to support the General Data Protection Regulations (2018).
- 1.3 The purpose of this policy is to provide guidance and ensure Council employees take responsibility for the management of information within their working environment. Information is a valuable asset of the Council and it is the responsibility of employees to ensure its confidentiality.
- 1.4 Agile working is in operation in some areas of the Council, if employee's works in an agile working area refer to the [Agile Working Procedure](#).
- 1.5 Where employees work from home or any other locations the minimum standards as detailed in section 4 of this policy must be adhered to at all times.

2.0 Scope of the procedure

- 2.1 This policy applies to:
 - ❖ All council employees (including fixed term and temporary), casual workers, agency workers and volunteers on all sites;
 - ❖ Contractors working on Walsall Council premises;
 - ❖ All visitors to Walsall Council premises, including partners, service users and clients.
- 2.2 This procedure excludes school-based employees/workers where the governing body has delegated authority and for whom separate arrangements apply.

3.0 Responsibilities

3.1 Executive Directors / Assistant Directors / Heads of Service

- 3.1.1 Executive Directors / Assistant Director/ Heads of Service will;
 - ❖ ensure that managers are aware of their responsibilities in accordance with this policy
 - ❖ ensure that this policy is applied consistently within their directorates or service areas.

3.2 Managers

- 3.2.1 Managers will;
 - ❖ be familiar and comply with this policy
 - ❖ ensure that employees are aware of their responsibilities in accordance with this policy
 - ❖ monitor and address any non compliance with this policy
 - ❖ undertake random checks to ensure compliance

3.3 Employee

3.3.1 Employees will;

- ❖ be familiar and comply with this policy
- ❖ raise any issues or concerns regarding compliance with their line manager in order to seek a resolution

4.0 Minimum standards

4.1 Clear Desk

- 4.1.1 At the end of the working day all employees/workers are expected to store away any work related confidential papers, personal data/files, written notes or post-its (this excludes personal items such as stationary/photographs) and any removable storage devices to leave their desks/workstations paper free. These should be secured in lockable cupboards/drawers or safely disposed.
- 4.1.2 If you work in an agile working area you must leave your desk/workstation clear of all items.
- 4.1.3 When leaving the desk/workstation for a major part of the working day, including lunch breaks all employees are expected to tidy their desks of work related papers, files, written notes or post-its.
- 4.1.4 All employees must ensure that any documents lying on desk/workstation are not visible to visitors, members of the public or colleagues who are not authorised to see them, in particularly when away from the desk/workstation for short periods, by taking responsible steps to protect information such as turning over papers or keeping them in a file.
- 4.1.5 Laptops left in the office overnight should be securely stored in a lockable cupboard/drawer.

4.2 Clear Screens

- 4.2.1 All employees when leaving their workstation/desk for any period of time including lunch breaks should ensure their computer screen or laptop is locked (Ctrl+Alt+Delete).
- 4.2.2 Employees should be aware of their surroundings at all times and take appropriate steps to protect confidentiality of information on their screens.

5.0 Monitoring compliance

- 5.1 Managers/supervisors are responsible for ensuring that their staff clearly understand and adhere to this policy, and will undertake random checks to ensure compliance. However, it is the responsibility of all employees to adhere to this policy to maintain the security and confidentiality of Council information.
- 5.2 Failure to comply may result in a disciplinary investigation and formal action taking place under the disciplinary procedure, which may ultimately lead to dismissal.

Equality Impact Assessment (EqIA) for Policies, Procedures and Services

Proposal name	Clear Desk and Screen Policy		
Directorate	Resources and Transformation		
Service	HR Strategy and Planning Team		
Responsible Officer	Tracey Edwards		
EqIA Author	Tracey Edwards		
Proposal planning start	20 Feb 2018	Proposal start date (due or actual)	TBC

1	What is the purpose of the proposal?	Yes / No	New / revision
	Policy	Yes	New
	Procedure	No	N/A
	Internal service	No	N/A
	External Service	No	N/A
	Other - give details		
2	What are the intended outcomes, reasons for change? (The business case)		
	The support Council in its obligation to ensure that it is compliant with the General Data Protection Regulations (2018) in relation to the management and processing of personal data.		
	In order to support the General Data Protection Regulations (2018) the Council expects all employees, casual workers, agency workers, consultants and volunteers undertaking duties on behalf of the Council to protect council information and personal/sensitive data.		
	The Clear Desk & Screen Policy sets out the expected standards for all employees, casual workers, agency workers, consultants and volunteers undertaking duties on behalf of the Council.		
3	Who is the proposal potential likely to affect?		
	People in Walsall	Yes / No	Detail
	All	No	
	Specific group/s	No	



	Council employees	Yes	All corporate employees including Chief Officers	
	Other			
4	Please provide service data relating to this proposal on your customer's protected characteristics.			
4.1	As of 31 March 2017 the total number of Walsall Council employees (excluding Schools) were 3428. In total there were 131 (3.82%) employees who declared they had a disability, as defined by the Equality Act 2010, some of these may require communication in a different format. The Councils workforce is made up of just over 69% females and 18.82% of employees from a minority ethnic group.			
	Type		Date	
	Audience			
	Protected characteristics			
	Feedback			
	N/A			
	Type		Date	
	Audience			
	Protected characteristics			
	Feedback			
	N/A			
4.2	Concise summary of evidence, engagement and consultation (including from area partnerships, where relevant)			
	Consultation feedback is detailed in appendix 3 of the Personnel Committee Report and the Personnel Committee Report			
5	How may the proposal affect each protected characteristic or group? The effect may be positive, negative or neutral.			
	Characteristic	Effect	Reason	Action needed Y or N
	Age	neutral	The policy sets out the approach to protecting Council information	No

	Disability		Potential impact on employees who require reasonable adjustments for communication and for those who do not understand the policy e.g. employees with learning disabilities.	Yes
	Gender reassignment	neutral	The policy sets out the approach to protecting Council information with no impact on any particular group	No
	Marriage and civil partnership	neutral	The policy sets out the approach to protecting Council information with no impact on any particular group	No
	Pregnancy and maternity		Potential impact for people who are on maternity or paternity leave and are not updated about the policy.	Yes
	Race		Potential impact on those employees whose first language is not English as they may not understand the policy. The Council are aware of their obligations under part 7 of the Immigration Act 2016 which creates a duty to ensure that all public authority staff in customer facing roles speak fluent English (or Welsh in Wales) to an appropriate standard to perform their role effectively.	Yes
	Religion or belief	neutral	The policy sets out the approach to protecting Council information with no impact on any particular group	No
	Sex	neutral	The policy sets out the approach to protecting Council information with no impact on any particular group	No
	Sexual orientation	neutral	The policy sets out the approach to protecting Council information with no impact on any particular group	No

	Other (give detail)		
	Further information		
6	Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details below.		(Delete one) Yes / No
7	Which justifiable action does the evidence, engagement and consultation suggest you take? (Bold which one applies)		
	A	No major change required	
	B	Adjustments needed to remove barriers or to better promote equality	
	C	Continue despite possible adverse impact	
	D	Stop and rethink your proposal	

Action and monitoring plan				
Action Date	Action	Responsibility	Outcome Date	Outcome
Day of launch	To ensure employees understand the requirements of the policy and support them to achieve the desired outcome.	Employees line manager should make themselves available to explain the policy to ensure understanding and offer support to allow individuals to achieve the requirements	As and when required	
Day of launch	To ensure employees who are on maternity leave to be made aware of the new Policy	Employees Line Manager	As and when required	
Day Of launch	The policy will be explained/made available in other languages on request for employees whose first language is not English.	Appropriate liaison as required with the councils Interpretation, Translation, Transcription and Easy Read service (ITTE)	As and when requested	
Day of launch	Alternative formats (audio and Easy Read) for disabled employees of the new policy will be made available on request.	Appropriate liaison as required with the councils Pearl Linguistics Service	As and when requested	

Update to EqlA	
Date	Detail

Policy/Procedure: Clear Desk & Screen Policy

Appendix 3

Scoping feedback received from sections of the organisation for consideration during the development of the relevant procedure/policy is shown below with commentary as to whether suggestions/requests were taken forward to formal consultation.

CONSULTATION FEEDBACK				
	Suggestion	Request	Taken forward	Rationale - response
1.	Concerns raised regarding availability of storage/lockable cupboards and drawers	How will the Council ensure there is enough storage facilities available	Yes / NO	Where it is identified there may be a shortfall in storage facilities, the service area should in the first instance liaise with other services to establish if there is available unused storage that can be reallocated. Where this is not possible service areas will be required to source facilities funded through own service budgets.
2.	Personal items [refer to 4.1.1]	If this policy is concerned with confidentiality does this include personal items such as photos etc. if not can this be made clear in the policy	Yes / NO	This policy supports the Council to provide guidance in relation to the management and processing of personal data. Therefore where agile working arrangements are not in operation the policy refers to council information, personal and sensitive information.
3.	'Clear desk' or 'Paper free' [refer to 4.1]	"Clear desk", "paper free" and "any documents" doesn't make any distinction between personal/confidential information and any other, e.g. a copy of a procedure. Is that intended?	Yes / NO	The policy is intended to provide guidelines regarding the management and processing of personal data.
4.	Agile working [refer to 1.4]	Should this read more prescriptively at the introduction around how the organisation is moving towards a more agile approach to working?	Yes / NO	The Council has an Agile Working Procedure and guidance, the policy has made reference to the Agile Working Procedure.
5.	Protecting documents within your work station [refer to 4.1.4]	All employees must ensure that any documents lying on desk/workstation are not visible to visitors, members of the public or colleagues who are not authorised to see them, how can this be managed	Yes / NO	The policy has been updated to provide examples of the type of action which can be taken.
6.	Protecting information on screens	When leaving their workstation/desk for any period of time (including lunch	Yes / NO	The policy refers to locking screens to reiterate the requirements set in the Agile Working Procedure and also forms part of the e-learning

CONSULTATION FEEDBACK				
	Suggestion	Request	Taken forward	Rationale - response
	[refer to 4.2.1]	breaks) all employees should ensure their computer screen or laptop is locked (Ctrl+Alt+Delete).		central responsible for information level 1&2 as a requirement for the protection of data
7.	Agile working	Can this policy cover agile working?	Yes / NO	As the organisation is not operating agile working in all areas at present this Clear Desk & Screen Policy covers all employees at all times in all situations.