

# POL93 – Using your Own Personal Device Policy

Human Resources - Performance & Discipline  
Serendipity Healthcare Ltd  
Unit 5 Millennium Way, Dunston, Chesterfield, Derbyshire, S41 8ND



## 1. Purpose

Serendipity Healthcare Ltd is committed to meeting its legal and duty of care obligations while at the same time providing a flexible environment to allow the use of non-company owned or issued devices to access company systems and store company and customer information.

The use of personally owned or issued devices for work purposes can introduce new risks protecting the integrity, confidentiality and availability of company information. This policy will set out the legal duties and guidelines to ensure that the use of personal devices does not compromise company or personal information that can be accessed through personal devices.

## 2. Scope

The following roles may be affected by this policy:

- All staff

The following Service Users may be affected by this policy:

- Service Users

The following stakeholders may be affected by this policy:

- Family

This policy should be read in conjunction with the Overarching Data Protection Policy and its supporting policies, procedures and standards.

## 3. Policy

The contents of Serendipity Healthcare Ltd systems and company data remain Serendipity Healthcare Ltd property. This covers all materials, data, communications and information, including but not limited to, e-mail (both outgoing and incoming), telephone conversations and voicemail recordings, instant messages and internet and social media postings and activities, created on, transmitted to, received or printed from, or stored or recorded on a personal device during the course of an employees work for Serendipity Healthcare Ltd or on its behalf is the property of Serendipity Healthcare Ltd, regardless of who owns the device.

Serendipity Healthcare Ltd data held on personally owned devices is subject to the Freedom of Information Act and the Data Protection Act and must be processed in compliance with information related legislation and associated Serendipity Healthcare Ltd policies.

Serendipity Healthcare Ltd reserves the right to refuse access to particular personally owned devices or software where it considers that there is a security risk to its systems and infrastructure.

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### 4. Responsibilities

All individuals who use their own device must take responsibility for their own device and how they use it. They must:

- Familiarise themselves with their device and its security features so that they can ensure the safety of Serendipity Healthcare Ltd information (as well as their own information);
- Invoke the relevant security features for the device;
- Maintain the device themselves ensuring it is regularly patched and upgraded using updates provided by vendors;
- Ensure that the device is not used for any purpose that would be at odds with Serendipity Healthcare Ltd IT Regulations of Use especially when it is on site or connected to the Serendipity Healthcare Ltd systems; and
- Pay for their own device costs under this policy, including but not limited to voice and data usage charges and any purchase and repair costs.

Staff using their own device must take all reasonable steps to:

- Prevent theft and loss of data;
- Keep information confidential where appropriate;
- Maintain the integrity of data and information, and
- Take responsibility for any software they download onto their device.

Staff using their own device must:

- Set up passwords, passcodes, passkeys or biometric equivalents of sufficient length and complexity for the particular type of device;
- Ensure that software on personally owned devices are appropriately licenced;
- Encrypt documents or devices as necessary;
- Not hold any information that is sensitive, personal, confidential, or of commercial value on personally owned devices. Instead they should use their device to make use of the facilities provided to access to information securely.
- Where it is essential that information belonging to Serendipity Healthcare Ltd is held on a personal device it should be deleted as soon as possible once it is no longer required, including information contained within emails, rota's and all company applications;
- Ensure that relevant information is copied back onto Serendipity Healthcare Ltd systems and manage any potential data integrity issues with existing information;
- Report the loss of any device containing Serendipity Healthcare Ltd (including email) to the Business Manager (SIRO);
- Be aware of any Data Protection issues and ensure personal data is handled appropriately;
- Report any security breach immediately to The Business Manager (SIRO) in accordance with the Data Protection Policy;
- Ensure that no Serendipity Healthcare Ltd information is left on any personal device indefinitely and make sure data is removed before a device is disposed of, sold or transferred to a third party; and
- Not keep any information longer than is necessary and only in line with Serendipity Healthcare Ltd Management Systems.

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### 5. Monitoring and Access

Serendipity Healthcare Ltd will not routinely monitor personal devices. However, it does reserve the right to:

- Prevent access to a particular system
- Take all necessary and appropriate steps to retrieve information owned by Serendipity Healthcare Ltd

### 6. Data Protection and Using Personal Devices

Serendipity Healthcare Ltd will process 'personal data' i.e. data about identifiable living individuals in accordance with the Data Protection Act 1998. Sensitive personal data is information that relates to race/ethnic origin, political opinions, religious beliefs, trade union membership, health (mental or physical) or details of criminal offences. This category of information should be handled with a higher degree of protection at all time.

Serendipity Healthcare Ltd, in line with guidance from the Information Commissioner's Office on Using personal devices for work 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 their own device to process personal data. Please also refer to Serendipity Healthcare Ltd Overarching Policy on Data Protection and Cyber Security.

Reviewed 23/08/2023

Lisa Ward  
HR Manager