

# Calne Without Parish Council

## IT Strategy

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## Document History

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## Review and Approval

Reviewed by:

Various

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# Executive Summary

## Background

During a recent training course facilitated by Wiltshire Association of Local Councils it became clear that Calne Without Parish Council (CWPC) should re-consider a number of aspects of its IT implementation. There were several areas that were identified during discussion on the night that should receive attention and since the training session further thoughts and discussion have resulted in this IT Strategy document.

## Current Situation

Website hosted with Weebly, package including domain name and web site hosting. One account, CWPC and Calne area transport, two web sites, two domain names.

Opportunities for community engagement are limited, with no social media icons on the website

All Councillors use personal email addresses, though the clerk has a specific Gmail address.

The current website is not compliant with current requirements and guidance for example:

- no cookie policy notice,
- no privacy policy notice,
- no takedown facility, and
- no copyright or site ownership statements

CWPC holds no social media accounts so its ability to interact with CWPC residents is limited to notices on boards, notices on the website and leaflet drops.

A key requirement (enshrined in law) is that websites must be accessible to all, and by corollary engagement with CWPC should be available to all. So while it is recognised that not everyone has access to social media, websites and email, many residents wish *only* to correspond via social media or email. To provide inclusive engagement, therefore, CWPC's engagement approach must accommodate multiple channels to include those who can't use digital communications and those who use digital communications almost exclusively.

## Requirements

### CWPC email addresses

Discussion with the trainer during the Councillor training evening highlighted the fact the Parish Councils are Local Authorities with all of the attendant legislative impact. Relevant to this discussion is the potential need to comply with a Freedom of Information request that requires the publication of email correspondence.

In 2017 the Information Commissioner's Office published a guidance document on the implications of the Freedom of Information Act (FOIA) on official information held in private email accounts<sup>1</sup>. The document makes clear that *"information is held by a public authority if— (a) it is held by the authority, otherwise than on behalf of another person, or (b) it is held by another person on behalf of the authority."* The document goes on to confirm that where information is held by another person on behalf of the public authority, the information is considered to be held by the authority for the purposes of FOIA, and that this applies to official business recorded in personal email accounts.

Where records are to be recovered from private email addresses it can be difficult to confirm that all records have been searched for relevant data.

Furthermore, deleting or concealing information with the intention of preventing its disclosure following receipt of a FOI request is a criminal offence under section 77 of FOIA.

Demonstrating compliance when data is held in personal email accounts could be difficult.

It is recognised that recovering email correspondence from personal email accounts following a FOI request is unlikely. However such a request is only likely to arise in circumstances where a member of the public has grounds to suspect something suspicious has occurred. It is precisely in these circumstances that the Council would wish to be demonstrably compliant in its response.

**Requirement 1:** CWPC should maintain CWPC email addresses for its Councillors and make clear in a guidance document that all Council correspondence should be conducted using CWPC email addresses.

## Adoption of a .GOV.UK domain name

An important outcome of the training session was confirmation that a parish council is just as much a local authority as a county council or metropolitan borough and from this stems the need, for example, to comply with FOI requests. As a local authority CWPC falls under the guidance of several important government bodies, for example The Information Commissioner's Office and the Government Digital Service. The Cabinet Office and the Government Digital Service have recently published updated guidance on the use of .GOV.UK domain names<sup>2</sup> and it is clear that parish councils are encouraged to use a domain name of the form <name>-pc.gov.uk.

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<sup>1</sup> Official information held in private email accounts - Freedom of Information Act, The Information Commissioner's Office, updated March 2017 [https://ico.org.uk/media/for-organisations/documents/1147/official\\_information\\_held\\_in\\_private\\_email\\_accounts.pdf](https://ico.org.uk/media/for-organisations/documents/1147/official_information_held_in_private_email_accounts.pdf)

<sup>2</sup> Guidance for Local government: naming and registering websites, updated 28 November 2017 <https://www.gov.uk/government/publications/naming-and-registering-government-websites/local-government-naming-and-registering-websites>

There are two main reasons for moving to a .GOV.UK domain name:

- Firstly, the .ORG generic top-level domain was originally intended for non-profit entities, though this restriction was not enforced and has since been removed. "Non-profit entities" is a vague term encompassing varying types of organisation from charities to political parties. As such the .ORG domain has become somewhat devalued.
- Secondly, the .GOV.UK domain commands respect and authority especially since all requests for the use of a .GOV.UK domain are assessed by the Naming and Approvals Committee, a government body set up to ensure that only eligible organisations may use the domain name.

**Requirement 2:** CWPC should transition from its existing `calnewwithoutpc.org` to `calnewwithout-pc.gov.uk`

### Publication of CWPC records

The publication of records is a key element of CWPC's responsibilities as a local authority. These records most often include agendas and minutes of meetings but can also include, for example, opinions on planning matters, records of purchasing decisions or CWPC's grant aid policies.

The existing website goes some way towards supporting these requirements but in a largely piecemeal fashion.

**Requirement 3:** A future website should provide an easy way to publish all of CWPC's records and a straightforward access path for their access by interested parties.

### Engagement with CWPC community to understand successes, needs and concerns

Increasingly the web and social media are seen as prime communications channels for all types of community engagement. CWPC's existing web site supports a basic contact form and publishes email addresses and telephone numbers for its Councillors.

There are no facilities to encourage the use of social media, likewise there are no facilities to support online conversations.

**Requirement 4:** A future website should provide an easy way for visitors to use social media (Twitter, Facebook, etc) to interact with CWPC.

**Requirement 5:** A future website should provide support for moderated conversations on topics of interest chosen by CWPC.

**Requirement 6:** A future website should provide support for a news channel.

**Requirement 7:** A future website should be hosted by a reputable and well-regarded supplier with demonstrably acceptable service levels<sup>3</sup>.

### Publishing information about Calne Without Parish on the web

The existing web site provides basic details about the Parish. There is considerable scope to expand the breadth and depth of information about Calne Without Parish. This would help with the dissemination of key service information, education, social inclusion and the encouragement of tourism.

**Requirement 8:** A future website should provide extensive facilities for the publishing of information about Calne Without Parish.

### Support for potential FOI requests

Although the FOIA has been discussed already an important requirement in the IT strategy is improved support for dealing with FOI requests.

**Requirement 9:** Any future IT systems deployed by CWPC must facilitate the management and retention of CWPC records and thus help in dealing with FOI requests.

### Compliance with data protection legislation and future GDPR<sup>4</sup> requirements

Details of CWPC's compliance with existing data protection legislation and with the future GDPR requirements is beyond the scope of this document however it is a requirement of any future systems that they facilitate compliance of all data protection legislation.

**Requirement 10:** Any future IT systems deployed by CWPC must facilitate compliance with current data protection legislation and future GDPR requirements.

### Use of standard systems wherever possible to provide greater choice in personnel for systems maintenance

A perpetual challenge for all parish councils, CWPC included, is finding skilled personnel to create and maintain their IT systems. The working assumption must be that software systems will change infrequently but administrators and website maintainers could change at any time.

To ease the burden of change any future IT systems should follow relevant standards and make use of software with a history of extensive successful adoption, not necessarily in the local authority sector. This will ensure that there is a large pool of talent that could be called upon to help with system maintenance.

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<sup>3</sup> It is not proposed to derive required service levels for email services and the website at this time.

<sup>4</sup> GDPR: General Data Protection Regulation <https://www.eugdpr.org/>

**Requirement 11:** All future IT systems must follow relevant standards and make use of software with a history of extensive successful adoption, not necessarily in the local authority sector.

### Reliable, simple to use email service

Email is the primary communication channel for CWPC business and if CWPC decides to provide Councillor email accounts then the email service must be robust, resilient and offer high availability. Server-based spam filtering should be part of the service. Recognising that across CWPC's Councillors IT skills vary, any email service must be easy to deploy to all Councillor devices.

**Requirement 12:** Any future email system must be robust, resilient and easy to deploy.

### Security and cyber-attack readiness

Although a cyber-attack on CWPC's IT systems might seem unlikely, the consequences could be considerable. For example if CWPC's email systems were compromised then offensive material could be sent to multiple recipients, purporting to originate from CWPC. Likewise the website could be hacked and malicious material posted online.

**Requirement 13:** Future email and website hosts must demonstrate a proactive approach to security and ensure all reasonable steps are taken to prevent unauthorised access.

### Backup and archive

At this time CWPC does not have its own records retention policy so any requirements are generic and inherited from broader legislation. Unless and until CWPC develops its own records retention policy any future IT systems must support backup and archive to ensure records are not lost through user error or system failure.

**Requirement 14:** Future IT systems must include backup and archive to ensure CWPC records are not lost due to user or system error.

## Recommendations and Timeline

The existing website and domain name hosting contract is due for renewal in July 2018 and though lacking in important functionality, the current website is doing its job. Likewise, the continued use of private email services for CWPC correspondence, though undesirable, is tolerable in the short term.

This gives Council time to evaluate alternatives and develop a detailed plan for the implementation of CWPC's future IT systems.

It is proposed that a working group be set up to evaluate and subsequently recommend IT systems for adoption by CWPC. Assuming acceptance of the proposals, then the working

group should oversee their implementation and the subsequent migration to the new systems.

The terms of reference of the working group must be agreed by Council and should include the identification of suitable personnel both to administer the IT systems and to maintain website content.

Key considerations for CWPC include:

- The appointment of an IT Working Group
- The budget to change and deploy any new IT systems
- The ongoing budget for supporting and maintaining any new IT systems
- Whether to move to a .GOV.UK domain name
- Whether to offer CWPC email addresses to councillors.

The target timescale is as follows:

