IT Policy 5.01

(Information Technology)

Subject:	**CELLPHONE AND MOBILE DEVICE POLICY**
Scope:	**ALL PERSONS CONDUCTING MIDDLESEX COUNTY BUSINESS USING A MOBILE DEVICE**
Issued:	**May 24, 2014**
Revised:	**Feruary 14, 2023**

Purpose

The purpose of the Cellphone / Mobile Device policy is to ensure the protection of personal information, personal health information, confidential information and any other information in the custody and control of Middlesex County while being transmitted and/or stored on mobile devices.

Definitions

"(ITS) Asset" means any physical electronic device owned by Middlesex County, which may contain or have access to sensitive information such as files and emails, or has considerable value and is uniquely identifiable via a serial number or other means.

"(The) County" shall be taken to mean the Corporation of the County of Middlesex.

"Authorized Person(s)" means any employee, consultant or contractor of Middlesex County who has been approved by their respective Department Head under this policy.

"Bring Your Own Device (BYOD)" See "Personally Owned Mobile Device(s)" for further information.

"Corporate Information" is any information, files, or communications which could be considered sensitive, privileged, or confidential, stored within ITS Assets owned by Middlesex County.

"Information Systems" refers to computer hardware, software, data, security, user accounts, and the means in which they are interconnected.

"ITS" means Information Technology Services.

"Mobile Device(s)" defines any cell phone, tablet, personal digital assistant, or any other related mobile device that can access the Internet. For the purpose of this policy, laptops are not considered mobile devices.

"Mobile Device Management (MDM)" is a means of deploying, securing, monitoring, integrating, and managing Mobile Devices. The intent of MDM is to optimize the functionality and security of mobile devices within the organization, while simultaneously protecting the corporate network and end-user.

"Monitoring Tool" An application installed on a workstation, server, mobile device, or laptop which collects logs for the purposes of troubleshooting, data protection, or monitoring as defined under the Electronic Monitoring Policy.

"Personally Owned Mobile Device(s)" are any Mobile Devices which are owned and maintained by the Authorized Person and used for business purposes. The devices must adhere to the Mobile Device Security and Hardware Standards outlined in this document.

Policy

Staff may be assigned a mobile device such as a cellphone or tablet at the discretion of their Department Head or Manager as required to perform necessary functions of their role.

Staff are responsible for the reasonable safekeeping of mobile devices while in their care. Staff shall notify their Department Head or Manager in the event a mobile device in their care is damaged, lost, stolen, or compromised.

With approval of the Department Head or Manager, and the approval of the Director of ITS or Manager of Technical Services and IT Infrastructure, Staff may utilize a personal mobile device for accessing corporate information. Staff using their personal device in this manner are subject to device security provisions as detailed in the Procedures section of this Policy. Additionally, Staff may be eligible for partial reimbursement for the use of such a device as defined in this Policy.

Middlesex County ITS shall take reasonable steps to ensure the safety and integrity of data stored on any mobile device capable of accessing corporate information as described in the Procedures section of this Policy.

Procedure

1. Corporate Issued Mobile Devices

Staff may be provisioned a mobile device such as a cellphone or tablet for the purposes of performing the duties of their job while employed at Middlesex County. Such devices shall be subject to the following provisions:

a) Mobile Devices shall be capable of performing the duty or task for which they were provisioned.
b) From time-to-time, staff may utilize a Corporate Issued Mobile Device for personal use provided it does not impact the integrity or security of any corporate data or information stored on the device or exceed what could be considered reasonable use.
c) Staff shall take reasonable measures to ensure the device is kept in reasonable working order, except for normal wear and tear expected through the continued use of the device.
d) Should a Corporate Issued Mobile Device become damaged through willful negligence, staff may be responsible for repairs or replacement of the device at the discretion of their Department Head or Manager.
e) Staff shall take reasonable measures to ensure the device and any data stored on the device remains secure, such as not permitting unauthorized individuals use the device, or leaving the device where it may be accessed by unauthorized individuals.
f) Staff shall inform their Department Head or Manager should the device become lost, stolen, damaged or compromised.
g) Staff shall not attempt to alter any security controls or provisions, such as “jailbreaking” the Mobile Device.
h) Staff are encouraged to use physical protections such as screen protectors and/or cases for the Mobile Device. These protections can be procured through Middlesex County ITS with approval of the staff member’s Department Head or Manager.
i) Mobile Devices shall be returned to Middlesex County ITS at the completion of employment, or during a scheduled Mobile Device upgrade. Exceptions to this provision may be granted at the discretion of the staff member’s Department Head or Manager and Director of ITS or Manager of Technical Services and IT Infrastructure.

2. Personal Mobile Devices (Bring-Your-Own Device)

Staff who would normally be provisioned a Mobile Device such as a cellphone or tablet for the purposes of performing the duties of their job may opt to utilize a personal device in-lieu of one provided by Middlesex County. These Mobile Devices are commonly referred to as “Bring-Your-Own Devices” or “BYOD”.

Staff who opt to utilize their own Mobile Device may only do so with the approval of their Department Head or Manager, and by completing the form at the end of this Policy.

Bring-Your-Own-Devices are subject to the following provisions:

a) Mobile Devices shall be capable of performing the intended duty or task. Should a Personal Device device not be capable of performing the intended duty or task, Middlesex County ITS may recommend a Corporate Issued Device in-lieu of a Personal BYOD.
b) Personal Bring-Your-Own-Devices shall be no more than four (4) generations old, and still receive regular security updates and support from the device manufacturer or vendor.
c) Staff are responsible for any damage and normal wear-and-tear that may be caused to Personal Bring-Your-Own-Devices.
d) Staff are responsible for any recurring service plans, warranty or maintenance fees, and any over-usage fees for the device, except for any pre-arranged reimbursement agreements for the usage of the device.
e) Staff shall take reasonable measures to ensure the device and any corporate data stored on the Personal Mobile Device remains secure, such as not leaving the device where it may be accessed by unauthorized individuals.
f) Staff shall inform their Department Head or Manager should the device become lost, stolen, or compromised.
g) Staff shall be responsible for ensuring the Mobile Device is kept up to date with current operating system patches and updates.
h) Staff shall not attempt to alter any security controls of provisions, such as “jailbreaking” the Mobile Device.
i) Staff are encouraged to use physical protections such as screen protectors and/or cases for the Mobile Device. Staff are responsible for any costs associated with procurement of these protections.
j) Middlesex County ITS shall remove access to any Corporate Data upon completion of employment, or during Mobile Device upgrades.

3. Mobile Device Management

All approved mobile devices configured to access corporate data, including corporate files and email, shall have Middlesex County approved Mobile Device Management software installed by Middlesex County ITS. This policy includes Bring-Your-Own devices supported under this Policy.

Employees accept that Middlesex County corporate information and/or data stored on the mobile device can be removed by Middlesex County ITS on behalf of Middlesex County, if;

a) Device is lost, stolen, or compromised
b) Device is not compliant with Middlesex County's policies
c) Device belongs to a person who is no longer working for Middlesex County
d) Staff try to uninstall the Mobile Device Management Software from the Device
e) Device is rooted, jailbroken, or modified in any manner

4. Electronic Monitoring

Any information on a Mobile Device which is accessible by the Mobile Device Management software may be subject to monitoring as defined in Middlesex County Electronic Monitoring Policy (HR Policy 1.17).

5. Reimbursement Options for Personal Mobile Devices

Monthly Reimbursement

The following table outlines reimbursement options for the use of Personally Owned Mobile Devices. At the direction of the employee's Department Head, other reimbursement options such as Long-Distance packages, may be available.

Requirement	Accessible During Regular Hours Only	Accessible During and Outside of Regular Hours
Voice Only	$15 per month	$20 per month
Data Only	$20 per month	$30 per month
Voice and Data	$30 per month	$40 per month
Emergency Purposes Only*	$10 per month	$15 per month

<u>Emergency Purposes Only</u>

Emergency Purposes Only is to ensure the safety and security of the individual while conducting Middlesex County business away from the office. Individuals may be required to provide their phone number and any accompanying information that provides proof that the phone number belongs to a cellular device account which is owned and maintained by the individual.

If an individual is authorized to use their Personally Owned Mobile Device for Emergency Purposes Only and has made an emergency call during their workday, the individual can recover the costs of the call as long as proof of the call is provided.

6. Cellular Roaming Packages for Personally Owned Mobile Devices

Staff utilizing an approved Personal Device who require access to cellular services while roaming (ex. attending a conference in the United States) and wish to be reimbursed must receive approval from their Department Head. The Department Head may consult with the ITS department regarding an appropriate cellular roaming package that will meet the requirements of the Authorized Persons anticipated business usage.

If requested, the Middlesex County ITS department will provide guidelines and training to the Authorized Person to ensure that all necessary measures are taken to minimize the potential for additional overage fees.

Any fees over and above the proposed roaming package are the responsibility of the Authorized Person unless such fees are related to business purposes.

7. Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)

Any electronic records created using Mobile Devices as it relates to this policy, including but not limited to individual call records, e-mails, text messages and internet access is information that could be released to the public under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), including any electronic records created using Corporate Issued Mobile Devices, or Personally Owned Mobile Devices.

8. Compliance

Middlesex County ITS enforces this Policy and related standards. Anyone who has reason to suspect a deliberate and / or significant violation of this Policy is encouraged to promptly report it to the Middlesex County ITS Service Desk. Policy violations that come to the attention of the Middlesex County ITS Service Desk will be escalated to the Director of ITS.

Staff in violation of this policy may be subject to disciplinary action up to and including termination.

9. Acknowledgement of Policy

By signing below, the Authorized Person acknowledges that they have read, fully understand, and agree to adhere to the terms and conditions laid out in this policy.

Employee Name (Please print): _____

Employee Signature: _____

Date: _____