



Guidance on using Digital Cloud Services

Why are we issuing this guidance? Some meetings may have already started using cloud services for their administration, and others have expressed a concern about going down this path. This guide aims to flag up some issues your meeting should consider if and when you start to use these types of services. It is for each meeting to decide whether use of these services is appropriate, and if so, for what types of administrative activities.

Cloud services is the term used to describe third party software which allows you to organise, store, and share various types of digital files on the internet. It includes services such as photo sites like Flickr and Picasa, sites with a very specific function such as SurveyMonkey, and sites such as blogs, but this guide will focus on sites used for storing and sharing documents, such as Dropbox and Google Drive.

These services have become popular as they allow people to:

Store digital files and access them from any device (tablet, mobile phone) or PC – whereas files stored on your PC's hard drive are only accessible from that PC, files stored in the 'cloud' can be accessed on any device that has internet access.

Share files and work collaboratively – these services make it easy for several people in different locations to share and work on files together. It can also be useful for when files are too large to send as email attachments.

Back-up and store – these services can be a way to back-up your files and save them in a different location, in case your main storage device, such as your PC, fails. Whereas people may once have used an external hard drive to do this, some now trust these services to store their information.

There are many companies offering these types of cloud service, and some come automatically with your operating system or email account, e.g. iCloud (Apple), One Drive (Microsoft) and Google Drive (Gmail). Other companies focusing solely on these services include Dropbox, Box, Cubby, Ubuntu etc.

They are generally initially free to use, although many also offer paid subscriptions for larger storage space or extra features. Many are also offering corporate accounts for businesses.

These services are useful for the reasons outlined above but they also have issues, of which you should be aware before choosing to use them.

Potential issues:

Ownership of data – many people think that the data you upload to these sites is somehow stored in a 'digital cloud' or 'on the internet', in reality, your data is being stored on one of these companies' servers and they are giving you access via the internet. Always read the terms and conditions to see what ownership the company has over your data – ideally they will exert no ownership rights over your data. It is also useful to be aware of what guarantees



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the company makes over returning the data to you, should they go into administration, for example. There have been cases of people losing their data when the company storing it suddenly goes bankrupt – this is something to bear in mind if this is the only copy of this data you are storing.

Data Protection Act (1998) – many of these companies are based outside of the EU. The nature of the way they store data, often means that their servers are in locations all over the world, often backed up in different continents to ensure service delivery and protect against failures. However this means that they are transferring your data outside the EU to countries where there is no data protection legislation. This may constitute a failure on your part as a data controller under the Act. It is advisable to think about this if you are transferring sensitive personal data.

Security – Any data which you transfer using the internet is liable to hacking, interception, viruses etc. whereas data stored on an external hard drive is not open to any interference therefore is secure. It is also true that these large high-profile companies are subjected to attempts by hackers on a daily basis. However this also means that these companies are at the forefront of data security and deploy huge resources to ensure their data is kept secure – whereas data on your internet-enabled PC or laptop is only protected by whatever anti-virus and protection software you run.

This means there are risks to balance, but actually your main security risk may be about how you use the sites – more of which below.

Using these services:

Before choosing to use one of these services, you should identify your purpose and ensure there are no other alternatives which would avoid these issues. For sharing files (including large ones you cannot email) you could use secure FTP file sharing. For back-up, look into using external hard drives or archival quality CD-ROMs. There will be lots of advice online about these alternative options.

If you decide you do need to use a cloud service, ensure you identify your purpose for using the site, you can then follow processes which will make your use of the site more secure and effective.

Are you using the service primarily to send information to people?

If so, you can ensure that after everyone has downloaded the documents onto their own PC/device, the storage area is cleared of all data, so that information only sits on the cloud site for short periods of time, reducing risk to the information. It is useful to give one person this role and to agree a time period for regular deletion.

Are you using the service primarily to back-up and store information?



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Using these services for medium or long-term storage of information, as a back-up to your main system or PC is possible – but it should be a back-up, it should not be your only copy of important information. You should also choose a site aimed at this rather than one aimed at sharing and interaction. Also consider access and passwords – will other people in your meeting be able to access this data should you be absent or incapacitated in some way? Passwords need to be protected and kept secure, but also known to several administrators to ensure continued access.

Are you using the service primarily to allow several people to work on the same documents?

If this is the case, then again, when the documents are finalized and no longer require editing, they can be cleared off the site and stored elsewhere.

Consider appropriate use

You must also consider the types of information you are uploading to these sites and whether it is appropriate to do so. It is useful to do this in line with your retention schedule (see guide to Template Records Retention Schedule).

For example, any records identified for **permanent retention** on your schedule, should be backed up in more than one location digitally to protect against loss – and for long term retention, the final versions should still be printed to paper. When final paper versions have been deposited with the record office, you can clear the digital copies off any storage systems.

Likewise any records on your schedule which have been identified as containing **sensitive personal data**, such as elders' and overseers' minutes, membership records etc, may not be appropriate for these sites. Apart from the issues around the cloud service meeting security requirements, it is also difficult for you to manage over time the access to the sites – it can be easy to give someone in the meeting access for one purpose, but they then can also access these sensitive documents which may not be appropriate.

This will also apply to any confidential **financial information**.

It may be useful to produce a quick guide for everyone in the meeting on the types of information it is ok to share on these sites, and the types of information it is not appropriate to share, taking into account your meeting's specific activities. You can incorporate this into your retention schedule – see the template retention schedule for an example.

This is a rapidly changing market and there is a lot of advice available online regarding these different services.

The government has also developed a site called Digital Marketplace outlining their chosen suppliers, after a rigorous tendering procedure. It is aimed at the public sector but it can be useful to see what sites they have approved. It is available here:

<https://www.gov.uk/government/collections/digital-marketplace-buyers-and-suppliers-information>

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In conclusion, think carefully before you choose to use these services, and about which service you choose to use.

If you decide you are going to use one....

- Use it in a managed way – control access, maintain password security, keep the information on there in an orderly, managed arrangement, clear down outdated information regularly.
- Think about the information – is it appropriate to upload the type of information and give wider access to it?
- Back-up any information which is intended for permanent retention in different locations and ultimately print to paper.