



**SECTION 26. INFORMATION SERVICES DEPARTMENT**

**26.5 INFORMATION SECURITY/DATA ACCESS POLICY**

**A. PURPOSE.**

(1) The purpose of the Information Security/Data Access Policy is to provide direction for effectively and efficiently managing the risks to Seminole County Government's information assets against accidental or malicious disclosure, modification or destruction whether internal or external, deliberate, or accidental.

(2) Security is critical to the organization's survival. This policy also defines the access controls that must be put into place to protect information by controlling who has the right to access the information assets, whether it is actual data, the hardware on which the data resides, or the application software used to manipulate data on systems installed throughout the County.

**B. SCOPE.** This policy applies to all members of the Board of County Commissioners, its departments, employees, volunteers, interns, contractual third parties, appointed committee members and Seminole County Constitutional Officers and their employees with any form of access to the information and information systems which impact the daily operations of Seminole County Government.

**C. TRAINING.**

(1) Effective security is a team effort involving the participation and support of every employee and affiliate who deals with information, information systems or both.

(2) It is the responsibility of every computer user to know what constitutes acceptable use of Seminole County Government systems, to know the guidelines, and to conduct their activities accordingly.

(3) All employees and third-party vendors shall receive training and supporting reference materials to allow them to properly protect Seminole County Government information assets before they are granted access.

(4) Security awareness training will be provided at regular intervals to ensure that all necessary employees maintain the desired level of proficiency.

**D. ROLES.** The roles of specific County staff in implementing this policy are set forth below:

(1) Data Custodian: A member or members who have ultimate responsibility for ensuring the protection and use of the organization's data. Responsibilities include:

(a) Identifying what data belongs to the Board and identifying the system of record.

(b) Identifying and documenting what roles are allowed access to the data and the level of access required.



(c) Determining and documenting the process for authorizing individuals to access the data.

(d) Implementing processes that maintain the integrity and accuracy of the data.

(e) Ensuring that the data is protected and the applicable laws are followed concerning handling of the data.

(2) Security Administrator: This role is responsible for the security of the data and systems that store the data. The responsibilities of this role include:

(a) Providing access to the users that are approved by the data custodian.

(b) Protecting data from unauthorized users.

(c) Ensuring that appropriate disaster recovery procedures are in place.

(3) Data User: The role is designated by the data custodian and has permission to access and use the data. Responsibilities include:

(a) Being accountable for all data made with his or her account.

(b) Ensuring that all use and distribution of data is only for approved purposes.

(c) Not disclosing data to unauthorized people.

(d) Keeping his or her password secret.

(4) Information Security Officer: This role is designated by the Chief Information Officer and responsibilities include:

(a) Assuming overall responsibility for the security of the County's information systems and data integrity.

(b) Establishing the policies and procedures necessary to ensure the security and integrity of the County's data and information systems.

(c) Working with Data Custodians to ensure the reliability and enforcement of any related policies and procedures.

(d) Organizing incident response to security breaches in order to minimize data loss or integrity concerns.

(5) Information Services Department: This role is responsible for supporting the electronic data systems infrastructure. Responsibilities include:

(a) Documenting and supporting the structure of the organization's data.



(b) Supporting the use of standard data definitions throughout the organization.

(c) Facilitating the appropriate sharing of data and integration of data between the organization's systems.

(6) Chief Information Officer: This role is responsible for providing oversight to the Information Services Department and providing guidance to the county on information systems issues. Responsibilities include:

(a) Appointing and revoking Data Custodian roles to all electronic information systems.

(b) Assuming the role of Information Security Officer in absence of other designees.

**E. DIRECTIVES.**

(1) All data, including software, produced by County employees, volunteers, interns, Commissioners and their aides, and third-party vendors while employed by the Board, is solely owned by the Seminole County Board of County Commissioners.

(2) All computer hardware, computing devices, including tablets and smart phones, operating systems, and third-party software applications purchased using funding provided by the Board are solely owned by the Seminole County Board of County Commissioners.

(3) Access to any information system that has security risks requires authentication by userid or password, biometric system, multi-factor authentication or other mechanism which minimizes unauthorized access to or alteration of the County's data. The Information Security Officer shall approve the appropriate authentication method.

(4) The Information Security Officer shall document and maintain appropriate standards for the creation, size, style and expiration period of passwords. All data users shall follow the standards.

(5) The Board delegates the responsibility for ensuring that the appropriate level of user access management is implemented and maintained in a secure manner to the Chief Information Officer or his or her designees. The Chief Information Officer shall assign an appropriate Data Custodian for each of the computer systems owned by the Board of County Commissioners.

(6) Formal user access control procedures must be documented, implemented and kept up to date by the Data Custodian for each application and information system to ensure authorized user access only. These procedures must cover all stages of the lifecycle of user access, from the initial registration of new users to the final de-registration of users who no longer require access. Security Administrators shall allocate access rights and permissions for each user to computer systems and data that are commensurate with the task they are expected to perform.

Users will not be granted access to information that is unnecessary for the performance of their tasks. The system's Data Custodian is responsible for determining the appropriate authorization levels for each data user.

(7) Where Board owned data systems cross the boundaries of the Board and other Constitutional Officers, the Chief Information Officer shall create a committee composed of members of both organizations to ensure that the data integrity and operational needs of both organizations are met. The Board of County Commissioners shall resolve any disputes. Under any circumstance, the Board delegates to the County Manager the ability to request access rights to any Board owned system for any data user. Any request made by the County Manager must be fulfilled as soon as possible.

(8) Employees outside the Information Services Department do not have administrative rights to any of the Board's information systems unless that access is granted in writing by the County Manager, Chief Information Officer, or designee(s).

(9) No information created by an employee of the Board of County Commissioners that is produced using County equipment will be considered private to the employee.

(10) Employees shall not install software on their computers or any computing device without the approval of the Information Security Officer or his or her designee.

(11) All employees of the Board of County Commissioners must retain data as required by Chapter 119, Florida Statutes (2016), as this statute may be amended from time to time ("Public Records"), and all other applicable law. Under no circumstance may an employee release data to the general public that is exempt from Chapter 119, Florida Statutes (2016), as this statute may be amended from time to time, and all other applicable law.

**F. NON-COMPLIANCE.** Non-compliance with this Policy by Seminole County employees and system users is a serious matter and will be dealt with accordingly on a case-by-case basis. Depending on the severity of violations and applicable legal statutes, consequences could result in removal of access rights and special system privileges, removal of system access, or, for County employees, disciplinary action to include potential termination of employment. In severe cases of fraud or breach of privacy laws, legal action may be taken.

**G. RESPONSIBILITY.** The Board of County Commissioners bears the ultimate authority and responsibility for Seminole County Government's information security. As such, the Board has established this Policy and directs Seminole County Government personnel to implement the Information Security/Data Access Policy as follows:

(1) The County Manager shall approve and enforce all information security guidelines that have county-wide scope.

(2) The County Manager shall appoint the Chief Information Officer or his or her designee as the Information Security Officer (ISO) to provide the direction and technical expertise to ensure that Seminole County Government's information is properly protected.



(3) All Seminole County Government Directors, Managers, Program Managers, Supervisors and other Seminole County Constitutional Officers (where their staff access the County's data systems) are directly responsible for implementing the Information Security/Data Access Policy and any subsequent policies, procedures and guidelines developed by the Information Security Officer and approved by the County Manager within their areas of responsibility, and for adherence by their staff.

**H. AUTHORITY.** Public Records Act, Chapter 119, Florida Statutes  
Resolution 2003-R-36 adopted February 11, 2003  
Resolution 2007-R-42 adopted March 13, 2007  
Resolution 2008-R-55 adopted February 12, 2008  
Resolution 2010-R-26 adopted January 26, 2010  
Resolution 2012-R-107 adopted June 12, 2012  
Resolution 2016-R-187 adopted November 15, 2016