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Policy Name	Mobile Device Use Policy
Policy Author	Data Protection Officer / Corporate Services Officer
Approved by Sub Committee	N/A
Approved by Management Committee	February 2026
Latest date of Next Review	February 2029

West Whitlawburn Housing Co-operative will provide this policy on request at no cost, in larger print, in Braille, in audio or other non-written format, and in a variety of languages. Please contact the office.



HAPPY TO TRANSLATE

Registered with the Scottish Housing Regulator No. 203
Registered Charity No. SCO38737, VAT Registration No. 180223636
Registered society under the Co-operative and Community Benefit Societies Act 2014

1 Introduction

- 1.1 West Whitlawburn Housing Co-operative (WWHC) provide mobile devices, including mobile telephones, laptops and tablets, to staff in circumstances where there is a business need for doing so.
- 1.2 This document sets out our policy regarding eligibility, usage and management of mobile devices issued to our staff.

2 Eligibility and Authorisation

- 2.1 Generally, most office-based staff will be issued with a mobile phone at the start of their employment with WWHC to support their role and for the general health and safety of staff members.
- 2.2 In addition, we may issue a mobile device to staff where it is deemed necessary for the execution of their duties. This will include staff who:
 - 2.2.1 work from home.
 - 2.2.2 require access to our data storage systems and other software and/or use Multi Factor Authentication (MFA) for such systems.
 - 2.2.3 are required to be available outside our core business hours; and / or
 - 2.2.4 are required to spend significant periods of time away from their desks.
- 2.3 The issue of a mobile device to staff must be authorised by the Corporate Services Officer or the staff member's line manager.

3 User Responsibilities

- 3.1 Staff members issued with a mobile phone are responsible for the device and must:
 - 3.1.1 take good care of the device, subject to reasonable wear and tear of the device through normal handling and take all reasonable and practical precautions to keep the device safe from damage, loss or theft.
 - 3.1.2 always keep the device secure and ensure that all required software and security updates are applied as soon as they become available.

- 3.1.3 only use the device for our business purposes and must not make personal use of the device.
- 3.1.4 not disable or remove the default security settings of the device, including passwords, PIN access codes and biometric authentication (if available).
- 3.1.5 not leave the device unattended, if they have the device with them outside our office or their home (where the staff member is permitted to work from home).
- 3.1.6 use the device lawfully in accordance with applicable legislation, including when operating machinery or a motor vehicle, and in line with location-specific requirements, such as when attending court or a hospital.
- 3.1.7 not “jailbreak” or otherwise modify the device in any way.
- 3.1.8 use the device in accordance with our policies and procedures relating to Data Protection and Information Security at all times.
- 3.1.9 not permit anyone, other than the staff member to whom the device was issued, to use the device.
- 3.1.10 only use and install applications on the device that have been approved by us and not knowingly download or install any software, program or utility which has not been approved by us or that undertakes a malicious activity or whose purpose is to adversely alter the security configuration of the device or obtain access to data contained on the device.
- 3.1.11 not use the device for unlawful purposes or to engage in harassment, obscene or other inappropriate behaviour.
- 3.1.12 not take or use the device outside the UK, unless this is necessary for the execution of their duties and has first been authorised by the Director.
- 3.1.13 immediately contact the Corporate Services Officer if the device experiences a software or hardware failure or if the device is lost or stolen or otherwise subject to a data security breach; and
- 3.1.14 return the device to us, including all cables, peripherals and accessories provided by us, on demand when there is no

business need for the staff member to continue to have the device or at the end of their employment with us.

4 Device replacement

- 4.1 We may replace the mobile device if it is lost or stolen or when business need or technological change dictates.
- 4.2 We may replace the mobile device if it is damaged, if it is not possible for the device to be repaired.
- 4.3 If it can be shown that a staff member's lack of care for the device contributed to the loss of or damage to the device, then the staff member may be required to contribute to the cost of a replacement device.

5 Monitoring

- 5.1 We will monitor a staff member's use of a mobile device to ensure that staff are complying with the law and our policies and procedures, including those relating to Data Protection and Information Security, when using the mobile device. This monitoring may include determining the location of the mobile device in the event of, for example, a data security breach involving the mobile device.
- 5.2 Devices will also be monitored monthly for any excess charges and other chargeable items (e.g. use of additional data, international phone calls, subscriptions etc.) using the mobile phone network provider billing and administration platform.
- 5.3 If it can be shown that a staff member is responsible for additional charges for items not relevant to their job role, then the staff member may be required to pay back any costs incurred by WWHC.

6 Consequences of failure to comply

- 6.1 We take compliance with this Policy very seriously. Failure to comply with the Policy puts at risk the personal data stored within the mobile device and could result in a breach of data protection legislation. This could give rise to a monetary fine and imposition of sanctions against us. It could also cause severe distress or financial or reputational harm to one or more of our service users and / or staff members.

- 6.2 Due to the importance of this Policy, failure to comply with any requirement of it will be investigated in line with our Disciplinary and Grievance Policy.

7 Equalities

- 7.1 We are committed to ensuring equal opportunities and fair treatment for all people in our work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

8 Review and updates to this Policy

- 8.1 This Policy will be reviewed at least every 3 years or earlier, if required by organisational changes or legislation.

Equalities Impact Assessment

Policy/Project/Service Information			
Lead Officer	Corporate Services Officer		
Policy / Project / Service	Mobile phone use policy	New Policy / Project / Service or revision of existing?	New policy
Is this a reassessment following amendments being required at a previous assessment?	No		
Briefly describe the aims, objectives and purpose of the policy / project / service.	To set out the responsibilities for staff who are issued a mobile phone to enable them to carry out their duties. To ensure the safe and responsible use of such devices and to protect all WWHC data.		
Who is intended to benefit from the policy / project / service? (E.g. applicants, tenants, staff, contractors)	Staff and Management Committee		
What outcomes are wanted from this policy / project / service? (E.g. the measurable changes or benefits to members/ tenants / staff)	Clear guidance on using a WWHC-owned mobile phone and so that staff are aware their mobile phone use may be monitored.		
Consultation			
Who have you engaged and consulted with as part of your assessment?			
Senior staff team			

Equalities Impact Assessment			
Which protected characteristics could be affected by the policy, practice, or service?		Identify any positive impact/s that could result for each of the protected characteristic groups.	Identify any negative impact/s that could result for each of the protected characteristic groups.
Age			N/A – policy set outs rules for using mobile phones. Not intended to impact a particular group(s) of people.
Disability			“
Gender Reassignment			“
Marriage & Civil Partnership			“
Race			“
Religion/Belief			“
Pregnancy/Maternity			“
Sex			“
Sexual Orientation			“

Action Plan To Mitigate Negative Impact		
What action/s are required to address the impacts arising from this assessment?		
Protected characteristics	Action	Implementation Date
Age		
Disability		
Gender Reassignment		

Marriage & Civil Partnership		
Race		
Religion/Belief		
Pregnancy/Maternity		
Sex		
Sexual Orientation		
Human Rights		

Final Decision	Tick relevant box	Include explanation where appropriate
Approved for implementation without change		
Amend or change the Policy/Project/Service		
Continue the Policy/Project/Service without change (despite impact)		
Stop the Policy/Project/Service		
Lead Officer Signature		
	R.Hosie	
Date	02/02/2026	
Date approved by Management Committee/ Sub Committee	23/02/2026	