

Town of Greater Napanee International Cross Border Cell Phone Policy



Approval Date:	June 24, 2025	Resolution #	288/25
Revised Date:		Resolution #	
Review Scheduled:	Annual Review		
Department:	IT	Contact:	Manager of IT
Approval Authority:	Council	Policy No:	IT-2025-01

1. Introduction

This policy outlines the procedures and guidelines for staff and members of Council of the Town of Greater Napanee when traveling internationally with electronic devices. It aims to protect sensitive information and ensure compliance with privacy and security standards.

2. Purpose

The purpose of this policy is to mitigate the risks associated with Customs and Border Protection officers' authority to search electronic devices. It provides guidelines on the use of temporary phones and SIM card swapping to protect sensitive data and maintain data sovereignty.

3. Scope

This policy applies to all employees and members of Council of the Town of Greater Napanee who travel internationally for any reason.

4. Definitions

Temporary Phone: A temporary phone used to protect privacy by containing only the information needed for the trip.

SIM Card: A small card inserted into a phone that contains the user's phone number and other data.

5. Responsibilities

5.1. Council of the Corporation of the Town of Greater Napanee

Council is responsible for:

- Approval of this policy and any amendments thereto.

5.2. Chief Administrative Officer (CAO)

Responsibility and authority is delegated to the CAO to:

- Ensure this policy is enforced consistently throughout the organization.

5.3. Manager of IT

Responsibility and authority is delegated to the Manager of IT to:

- a) Monitor current best practices and government advice with respect to data protection and international travel; and
- b) Make recommendations on any updates or amendments to this policy, as well as implementation procedures.

5.4. Employees

All Town employees issued a municipal cell phone are responsible to:

- a) Understand and adhere to this policy.

6. Policy

6.1. Engage in Loan Program Prior to Travel

- a) Council and Employees participating in the loan program will be required to trade in their Town phone for a temporary phone that will hold their SIM card. Regular Town phones can be retrieved with return of the temporary phone. If employees do not wish to engage in the loan program they do so on the understanding that they will leave their device in Canada and will be without a Town supplied device when they cross the border.

6.2. Use of Temporary Phones:

- a) Council and employees are encouraged to use temporary phones when traveling internationally to protect their privacy and sensitive information.
- b) Temporary phones should not be connected to any work-related accounts (e.g., Microsoft 365).

6.3. SIM Card Swapping:

- a) Council and employees may swap their SIM card into a personal device that meets the SIM size requirement.
- b) Any personal device used must not contain any Town data or have any Town-related accounts connected for the duration of the trip.
- c) The IT department will assist with SIM card swapping and ensure the personal device is compatible.

6.4. Provision of Temporary Phones:

- a) The Town has a number of old phones available for use as temporary phones.
- b) These phones will be locked down to prevent the installation of applications and will be used solely for the duration of the trip.

6.5. Data Protection Measures:

- a) Council and employees should reduce the amount of sensitive information stored on their devices before traveling.
- b) Important data should be uploaded to a secure cloud storage service and deleted from the device.
- c) Devices should be encrypted and protected with a strong password.
- d) Biometric features (e.g., fingerprint or facial recognition) should be disabled, and a PIN or passcode should be used instead.

6.6. Compliance with Legal Requirements:

- a) Council and employees should be aware that international border officers can search electronic devices without a warrant.
- b) Council and employees should comply and be forthcoming in all interactions with border authorities.

7. Enforcement

The IT department will monitor compliance with this policy and provide support as needed. Non-compliance may result in disciplinary action.

8. Related Documents

N/A

Appendices

N/A

Revision History

Date	Number	Description
June 24, 2025	IT-2025-01	NEW