

ORDINANCE NO. 2025-58

AN ORDINANCE ESTABLISHING A CYBER INCIDENT REVIEW AND RESPONSE PROCESS FOR THE CITY OF WILLOWICK, OHIO, AND DECLARING AN EMERGENCY.

WHEREAS, the City of Willowick relies on computer systems, networks, software, and digital data to provide essential public services; and

WHEREAS, cyber incidents—including but not limited to data breaches, ransomware attacks, unauthorized access, system disruptions, or other malicious cyber events—pose risks to the City’s operations, financial integrity, and the security of sensitive information; and

WHEREAS, the City recognizes the need for a clear process by which any cyber incident is promptly evaluated and appropriate actions are taken to protect City operations, employees, residents, and public resources; and

WHEREAS, City Council finds it in the best interest of the City to establish a formal review procedure so that each cyber incident is addressed on a case-by-case basis, ensuring flexibility and effective response.

NOW, THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF WILLOWICK, COUNTY OF LAKE, AND STATE OF OHIO:

Section 1. Definition of a Cyber Incident.

For purposes of this Ordinance, a “cyber incident” shall mean any event that:

- a) compromises, or is suspected of compromising, the confidentiality, integrity, or availability of the City’s information systems, networks, software, or digital data; or
- b) results in unauthorized access, loss, alteration, theft, destruction, or disruption of the City’s digital resources; or
- c) requires investigation by the City’s IT Department, cybersecurity vendors, the Lake County Prosecutor’s Office, law enforcement, or other governmental cybersecurity authorities.

Section 2. Initial Reporting and Notification.

Upon identification or reasonable suspicion of a cyber incident:

- a) The City’s IT Department or relevant department head shall immediately notify the Mayor, the Council President, and the Law Director.
- b) The IT Department shall begin preliminary containment efforts and document all findings.
- c) The Mayor may authorize engagement of outside cybersecurity professionals as necessary.

Section 3. Case-by-Case Review by City Council.

- a) Upon receiving notice, City Council shall convene—either at a regular meeting, special meeting, or emergency meeting—to review the facts and circumstances of the cyber incident.
- b) Each cyber incident shall be evaluated **on a case-by-case basis**, taking into account:

1. The nature and severity of the incident;
2. The impact on City operations or public services;
3. Potential exposure of personal, financial, or confidential information;
4. Recommended actions from IT staff or cybersecurity professionals;
5. Any legal or regulatory reporting requirements.

c) Council shall determine appropriate actions, which may include but are not limited to:

- Allocating funds for remediation;
- Authorizing emergency expenditures;
- Approving temporary operational adjustments;
- Directing staff to notify affected individuals or agencies;
- Approving policy updates or further security measures.

Section 4. Records and Documentation.

A written incident report shall be completed following each cyber incident and shall include:

- a) A summary of the event;
- b) The City's response actions;
- c) Findings of any investigation;
- d) Recommendations for prevention of similar incidents.

All reports shall be retained in accordance with Ohio public records retention laws.

Section 5. Authority to Implement Immediate Protective Measures.

Nothing in this Ordinance shall prevent the Mayor, IT Department, or Law Director from taking immediate protective actions necessary to preserve City systems or comply with legal obligations prior to Council's review.

Section 6. Severability.

If any section, clause, or provision of this Ordinance is found to be invalid or unconstitutional, such finding shall not affect the remaining portions of this Ordinance.

Section 7. Effective Date; Emergency.

This Ordinance is hereby declared to be an emergency measure necessary for the immediate preservation of the public peace, health, and safety of the City—specifically to ensure that the City can respond promptly and effectively to cyber threats. It shall take effect immediately upon passage by Council and approval by the Mayor.

WHEREFORE, this Ordinance shall be in full force and effect immediately upon its passage by Council and approval by the Mayor.

Adopted by Council_____

Monica Koudela, Council President

Submitted to the Mayor: _____

Approved by the Mayor: _____, 2025

Michael Vanni, Mayor

ATTEST: _____
Alyssa Moran, Clerk of Council