



## Email Retention and Usage Policy

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Lead Officer	Depute Principal – Planning & Student Experience
Review Officer	ICT Services Manager
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Reviewer	Date	Review Action/Impact
ICT Services Manager & Info Dev Manager	29/09/20	Change in legislative references: Freedom of Information Act 2000 to Freedom of Information (Scotland) Act UK Data Protection Bill 2018 to UK Data Protection Act 2018 Para 4.6 added “and the student’s college email address.” Para 6.1 removed the word “wide”

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## 1. Policy Statement

Email is subject to the Freedom of Information (Scotland) Act 2000, the EU General Data Protection Regulation 2016 and the UK Data Protection Act 2018. As such it needs to be managed appropriately and only retained when required.

It is not appropriate to retain all emails indefinitely, or conversely to delete emails that could be viewed as records relating to a project or work activity subject to a longer retention period.

In addition, College email should be used for work purposes only and not used for personal communication or to subscribe to non-work related mailing groups, as these communications will also be subject to the regulations above.

## 2. Legislative framework / related policies

- 2.1. Freedom of Information (Scotland) Act 2000
- 2.2. UK General Data Protection Regulation
- 2.3. UK Data Protection Act 2018
- 2.4. Data Protection Policy
- 2.5. Information Security Policy
- 2.6. UHI Partnership Information Security Acceptable Use Policy
- 2.7. Records Management Policy
- 2.8. Freedom of Information Policy

## 3. Scope

- 3.1. This policy applies to all email sent and received by Inverness College UHI staff using their individual and, where relevant, group or team UHI email addresses.

## 4. Use of College Email

- 4.1. College email accounts should be managed securely and for work purposes only to comply with the relevant legislation above.
- 4.2. College email addresses should NOT be used to subscribe or login to non-work-related websites or mailing lists, e.g. paypal, ebay, shopping websites, facebook etc.
- 4.3. College email should NOT be used for non-work related communication or activity.
- 4.4. Staff should NOT download College email to a non-College PC, laptop or mobile device. However, it is possible to access College email via the web browser (<http://outlook.com/uhi.ac.uk>) or the Microsoft Outlook app on an ios or Android device. *(Please contact the ICT Helpdesk for more information)*
- 4.5. College email should NOT be forwarded to an alternate email account, such as hotmail or yahoo.

- 4.6 Staff should only communicate with enrolled students using their College email account and the student's college email address.
- 4.7. Do NOT use .pst files (Outlook personal folders) to archive emails to a PC or external hard disk. These are liable to be lost or overlooked when requested under FOI.
- 4.8. Anything you write, send or receive in an email may be subject to disclosure under FOI or the DPA. Email may also be used as evidence in legal proceedings.

## **5. Retention of Emails**

- 5.1. College staff are responsible for managing their email in the same way they manage other business records.
- 5.2. The retention of email is governed by the information within it, not the medium it is stored. Please refer to the Record Management Policy for more information on the appropriate storage for records. For example, key communication regarding an EU funded project would require much more thought before deleting than emails to a colleague to arrange a meeting.
- 5.3. That is, due to the diverse work across the College, there is no "one size fits all" approach to email retention.
- 5.4. However, the presumption is that unless there are good reasons to retain an email it should be deleted and there are automated methods within your email client to comply with this.
- 5.5. Retention of emails should comply with the current data protection legislation. In particular, "Personal data shall be kept in a form which permit identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed".
- 5.6. College staff should consult their line manager, in the first instance, where they require clarification on email retention and department records management.

## **6. Compliance**

- 6.1. This policy is a cross college policy; and all staff must work to meet the requirements outlined within the policy.
- 6.2. Any staff found to be in breach of this policy may be subject to action through the College's disciplinary procedures.

## **7. Monitoring**

- 7.1. This policy will be reviewed regularly, at least annually, by the ICT Services Manager and Information Development Manager to ensure it reflect changes in legislation and best practice.