

Ormiston Academies Trust

Ormiston Sheffield Community Academy Email Retention policy

Policy version control

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| Policy type | OAT Statutory |
| Author | James Miller, OAT DPO |
| Approved by | Stuart Turnbull – January 2019 |
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| Description of changes made to original: | Point 3 – changed from Email Signatures to Email Disclaimer – staff will format their own email signatures. |

Email Retention & Archiving Policy

1. Introduction

- 1.1. Ormiston Academies Trust (referred to as “The Trust” and any or all of its Academies), understand that computer technology is an essential resource for supporting teaching and learning. The internet, and other digital and information technologies, can provide students with the opportunity for learning through collaboration. Whilst the Trust recognises the importance of promoting the use of computer technology throughout the curriculum, we also understand the need for safe internet access and appropriate use.

The Trust has created this policy with the aim of ensuring appropriate and safe use of the internet and other digital technology devices by all students and staff.

The Trust is committed to providing a safe learning and teaching environment for all students and staff and has implemented controls to reduce any harmful risks.

This policy will be reviewed every 12 months or as necessary to reflect best practice, or amendments made to legislation.

Email is a universal electronic communication system. Email is about person to person communications, but the outcome of an email exchange can have a much wider significance.

For example, a member of staff could inadvertently commit The Trust to an action by an email message; he or she can cause illegal material to be transmitted through The Trust’s systems for which The Trust may be liable; all emails held at The Trust are legally discoverable following a request under the General Data Protection Regulation (GDPR) or the Freedom of Information Act (FOI) and may be cited as evidence in legal proceedings.

Recent legislation such as the Data Protection Act 2018 and Freedom of Information Act has highlighted that it is timely to adopt more formal policies for email retention.

There are key situations where an obligation to retain emails arises: Under Freedom of Information law – The Freedom of Information Act, section 77, contains an offence of altering, defacing, blocking, erasing, destroying and concealing any records held by a public authority with the intention of preventing the disclosure of records in compliance with a FOI access request or a GDPR access request.

The Trust will retain only personal data that is appropriate for the function of the organisation. This will ensure The Trust meets its Data Protection Act obligations set out in law.

This document sets out policy that The Trust will follow to ensure data is not kept longer than needed, ensuring The Trust meets its legal obligations and endeavours to safe guard business critical information.

2. Email Storage

- 2.1. Please note, mailbox owners are responsible for managing their own mailbox and the data held within. If you have concerns regarding the storage or deletion of an email, please contact your local Data Protection Lead (DPL) for guidance.
- 2.2. All emails will be processed using the following:
 - 2.2.1. Emails must be automatically deleted 6 months after being received unless required for business-critical needs or for other operational purposes.
 - 2.2.2. Email content **MUST** be assessed and stored in line with the OAT Data Retention Policy.
 - 2.2.3. Deleted emails where a “Recycle Bin” is in use; emails held within the Recycle Bin will be stored for a maximum of 10 calendar days before being automatically and permanently deleted.

- 2.2.4. Devices used to store emails **MUST** meet the ICT Security requirements associated with the device type. These devices **MUST** not be shared in a manner that allows unauthorised access to OAT emails. Please see the E-Security Policy for more information.
- 2.2.5. When sending emails, only include users that are required and where the content is appropriate for the users. Emails must **NOT** be sent to recipients where the content is not appropriate or where there is no beneficial need or business requirement.
- 2.2.6. When forwarding emails, you **MUST** ensure that the recipients are correct, and the content is appropriate for the recipient, including any historical content contained within the email.
- 2.2.7. If you believe you receive an email in error, you **MUST** contact the sender only immediately to confirm. Under no circumstances should this email be shown or forwarded to any recipient until confirmation has been provided from the original sender. In the event of the email being sent in error, the recipient **MUST** delete the email immediately from all devices and the local DPL must be notified.
- 2.2.8. If you believe you have sent an email to an incorrect recipient, then you must, if possible, recall the offending email and contact the appropriate recipients informing them of the error and requesting that it be removed immediately. You **MUST** also contact your local DPL and inform them of the error.

3. Email Disclaimer

- 3.1 The following disclaimer will appear at the bottom of every email sent from your academy account.

This message contains confidential information and is intended only for the recipient. If you are not the recipient you should not disseminate, distribute or copy this email. Please notify dpl@scacademy.co.uk immediately if you have received this email by mistake and delete this email from your system. Email transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Ormiston Academies Trust does not accept liability for any errors or omissions in the content of this message, which arise as a result of email transmission. Ormiston Academies Trust is a limited registered company in England and Wales, registration number 06982127. The registered office for Ormiston Academies Trust is Unit 10, Chilgrove Business Park, Chilgrove, Chichester PO18 9HU. Ormiston Academies Trust is part of Ormiston Trust whose registered office is 20 Croxley Road, London, W9 3HL.

4. Exemplar email data processing actions

- 4.1. The following questions are listed for guidance to inform how email data should be processed:

| Email Processing Question | Action |
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| The email is informal correspondence between staff or external bodies, confirming a meeting, or agreeing something that is not related to documents detailed in the OAT Data Retention Policy | The email MUST be deleted once processed. |
| I am only wanting to retain the email due to the attachment? | Save the attachment to the academy document storage system. Once stored, the email can be deleted. Ensure that the attachment is stored in line with the OAT Data Retention Policy. |
| The email contains information that is required for audit trail purposes such as correspondence on contracts or purchases, correspondence pertinent to quality assurance processes or delivery of projects etc. | Review data type and file the email in line with the OAT Data Retention Policy. |
| I have received an email that I want to keep but am not sure if I am allowed. | Review the OAT Data Retention Policy for guidance. If you are still unsure, please contact your local DPL. |