

Report To:	Policy and Resources Committee	Date:	11 August 2015
Report By:	Chief Officer Designate Inverclyde HSCP	Report No:	SW/09/2015/AMcD
Contact Officer:	Allan McDonald	Contact No:	01475 712098
Subject:	Email Archiving and Deletion		

1.0 PURPOSE

- 1.1 The purpose of this report is to recommend a corporate approach to the deletion of archived emails that reflects the Council's Records Retention and Information Classification Policy and the Records Management Policy.

2.0 SUMMARY

- 2.1 The Council uses Email Archiving to process, store and manage email messages and attachments, calendar entries and tasks. Currently all emails are retained and are not subject to any review or permanent deletion process.
- 2.2 A Corporate Policy for the Retention and Disposal of Documents and Records was agreed at Policy and Resources Committee meeting on 13th November 2012.
- 2.3 A Corporate Records Management Policy was agreed at Policy and Resources Committee on 24th March 2015.
- 2.4 It is recognised that there is currently no management of stored emails within the Email Archiving System and it is impractical to retrospectively carry out any meaningful review of the data stored in each of these files. Following approval of the Retention and Disposal of Documents and Records Policy and Records Management Policy, the Information Governance Steering Group proposes, subject to the qualifications below, to implement a policy that automatically deletes all emails after six months.
- 2.5 It is proposed to implement a "Retain Folder" for each user that will allow selected emails to be protected from any automatic deletion. Staff will be provided with suitable instruction and advice on how to use this facility to comply with the various Council Policies.
- 2.6 A programme of email deletion will be implemented beginning in January 2016 until all remaining emails stored in the archive have been processed in line with the appropriate Council Policies and legislative requirements.

3.0 RECOMMENDATIONS

That the Committee:-

- a) Note and approve a policy to delete all emails over 6 months old as part of the implementation of the Retention and Disposal of Documents and Records Policy.
- b) Note that the programme of email deletion will be implemented in January 2016 to align the current email archive to the new policy.
- c) Note that a full set of user instructions is to be developed and distributed to all staff and that staff are to be reminded of the most appropriate method and location of storing emails and other official documentation prior to implementation.
- d) Note that a "Retain Folder" will be created for each user to store emails that require to be permanently retained.
- e) Note that all remaining emails will be deleted six months after receipt.

Brian Moore
Corporate Director HSCP

4.0 BACKGROUND

- 4.1 A Corporate Policy for the Retention and Disposal of Documents and Records was agreed at Policy and Resources Committee meeting on 13th November 2012. It sets out the Council's approach to the storage, retention and disposal of official documents, detailing retention and destruction schedules for both paper and electronic documents and records.
- 4.2 A Corporate Records Management Policy was agreed at Policy and Resources Committee on 24th March 2015. It enables the Council to meet its statutory requirement to "make proper provision for the preservation and management" of its records; to be publicly accountable for and able to justify its decisions and actions; and to enable compliance with the requirements of the Public Records (Scotland) Act, 2011, the Data Protection Act 1998, the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.
- 4.3 The CMT has recognised that there is currently no management of stored emails within the Email Archiving System and, following approval of the Retention and Disposal of Documents and Records Policy and Records Management Policy, has asked the Information Governance Working Group to address this issue by proposing an approach to managing emails within the email system.
- 4.4 **Archive Manager Retention and Deletion Policies.** Currently all emails, calendar entries and tasks are copied to the email archive system immediately upon receipt. 120 days after receipt the body of the email is removed and is only available via the archive.
- 4.5 **Management by Individual Users & Services – "Retain Folder".** It is proposed to implement a new network folder for all staff. This folder will be used to permanently retain the documents contained within the folder.
- 4.6 **Retention Policy Editor.** Where an email has not been moved to the network folder a default disposal date will be implemented. Using the email archiving system retention policy editor, a rule will be implemented that will automatically delete all remaining emails, calendar entries and tasks six months after they entered the email system.
- 4.7 **Investigative, Legislative and Compliance Issues.** Developing any policy will target all messages that are on the Council email system and it is important to note that, although an audit trail of the deletion process remains, once these messages are deleted, they are deleted permanently from the email system.

5.0 PROPOSALS

- 5.1 The Corporate Management Team recommends the following:
- ICT to implement a network folder for all staff to retain mail that they wish to permanently retain.
 - Staff to be given suitable instructions/guidelines/training in the operation of the Email Archiving System.
 - As part of the implementation of the Retention and Disposal of Documents and Records Policy, the proposed Information Classification Policy and the implementation of this Policy, staff are also be reminded of the most appropriate method and location of storing emails and other official documentation.
- 5.2 All Remaining emails (not categorised or retained) to be deleted six month after receipt.

6.0 IMPLICATIONS

Finance

- 6.1 Costs to upgrade Email Archiving infrastructure will be met within ICT Services on-going Switch & Server replacement plan.

Legal

- 6.2 It is a breach of the Data Protection Act 1998 to retain personal data for longer than is necessary therefore, an email deletion policy is required to bring the Council in line with the 1998 Act. Detailed guidance on retention and disposal of documents and records is contained within the Council's Policy for the Retention & Disposal of Documents & Records Paper & Electronic.

Human Resources

- 6.3 There are no know human resources implications.

Repopulation

- 6.4 There are no know repopulation implications

7.0 EQUALITIES

- 7.1 Has an Equality Impact Assessment been carried out? **NO**
- 7.2 No equalities impact.

8.0 CONSULTATIONS

- 8.1 The Information Governance Group has been consulted.

9.0 BACKGROUND PAPERS

- 9.1 None.