**Email Communications Policy**

1. **Email rationale**

1.1 The Parish Clerk will have a dedicated separate email address

1.2 Councillors will be provided with a dedicated separate email address that is only to be used for council benefit., and are strongly advised against using their own personal email addresses for council business

1.3 The Council’s approved Records Management Policy (for FOIA/GDPR purposes) states that emails need to be retained for as long as necessary if related to a specific project/issue

1.4 Emails received by the Council’s Officer may be disclosed following a request under the Freedom of Information Act 2000 or following a subject access request under the General Data Protection Regulations (GDPR), 2018 or in the course of legal proceedings.

1.5 The above applies to emails from and between Members, where the Officer is copied into the communications. There can be no guarantee that such emails (or letters and other communications) from or between Members and Officers will not be disclosed to an unintended audience.

1.6 If inappropriate internal Council emails are required to be disclosed to persons external to the Council then, at best, they may be considered embarrassing for the Council and, at worst, have other unwanted consequences. If internal emails are defamatory, offensive, or wrongly disclosed confidential information or personal data (which means information that may identify a living individual, such as name, address or telephone number) to those who should not have such confidential information or personal data, this may provide others with a means of legal redress against the Council.

1.7 If official business of the Council held in personal email accounts of Members (and the Officer) contains personal data, it may come within the scope of a subject access request under the 2018 Act.

1.8 If the personal email accounts of Members contain personal data that relates to their activities as a Ward Councillor or campaigning for election, it may come within the scope of a subject access request to the Member under the 2018 Act.

1.9 Information in the personal emails of Members that does not relate to the business of the Council will not be subject to the 2018 Act.

1. **Procedures for Members (and Officer) when sending emails** 
   1. If a councillor uses a personal email address for council business, then if an email is received from a member of the public- this should be forwarded straight away to the Parish Clerk to deal with.
   2. Councillors should be aware that any responses made directly from their email address are their own opinion and not the opinion of the Parish Council as a whole
   3. When writing emails, always assume that they may have to be disclosed to a court or tribunal or to the Information Commission, because in some circumstances that could happen.
   4. Before sending an email, think about its purpose and consider if it is the best form of communication method to use. For example, a telephone call or a face-to-face discussion might be more effective.
   5. Keep the email message relevant and concise. Do not send unnecessary copies of the message or forward it on to others if not strictly necessary.
   6. Always write emails as if they are permanent, because even when they have been deleted they can often still be retrieved and may be disclosable to a court or the Information Commissioner.

* 1. Internal emails, even if marked private or confidential, might eventually need to be disclosed when it is lawful to do so, e.g. under the 2018 Act or as part of the requirement on parties to disclose documents in the course of legal proceedings.
  2. Information communicated by email may not be confidential, but it may be sensitive information that needs to be respected.
  3. Always respect the privacy of others. Check when forwarded that other addresses are not visible
  4. Do not send email that might be construed as offensive or discriminatory.

2.11 Do not make negative comments about an individual, including members of the public, Members, Officer, or business suppliers.

**3. Procedures for Officer to receive, acknowledge and action, file or discard**

3.1 Emails received are generally read on a day-to-day basis, as they are received. Any received out of normal working hours are classed as received at the start of the next working day.

3.2 Where appropriate, a personalised acknowledgement to be provided, ideally within 48 hours (unless the office is closed/Clerk on holiday).

3.3 When the office is closed for a week or more (e.g. when the Clerk is on holiday) an auto-response message is sent, to indicate that the office is closed (from/to dates) and who should be contacted if a matter is urgent.

(Chairman) (Responsible Financial Officer / Clerk)

Approved and adopted by Twywell Parish Council -