

E-mail etiquette regarding Personal Data.

Introduction

E-mail is accepted as one of the most common means of communication used on a daily basis. With many colleagues accessing e-mails across multiple devices, it is important that e-mails are used appropriately. This guide provides information on acceptable behaviour in regards to the use of e-mail across NCG and in particular focuses on Personal Data and privacy.

The NCG Acceptable Use Policy and the NCG E-mail Policy, provide further information, but here are a few salient excerpts.

- Use of corporate e-mail should be for NCG business purposes only. Corporate e-mail accounts should not be used to subscribe to anything for personal purposes e.g. newsletters, dating services, social media etc.
- Use of e-mail may be subject to monitoring for security, safeguarding, network or other management reasons. Employees should therefore have no expectation of privacy in any e-mail sent or received.

Personal Data

Please remember to take extra care when sending personal data by e-mail. Personal data is data that can be used to identify a living individual, e.g. their name, address or date of birth etc.

If an individual makes a rights request under UK GDPR rules (e.g. a Subject Access Request,) they have the right to access any information that an organisation holds about them subject to some exemptions. This often includes copies of e-mails (that relate to them) or notes taken in 1-2-1 meetings. Even e-mails that are labelled confidential or strictly confidential may be disclosable in some cases. This means that it is important to consider the contents of e-mails before they are sent. Is there anything in your e-mails that you would not want others outside the e-mail conversation to access?

E-mail addresses are identifiable personal data under the GDPR, so it is important to consider how you include addresses in e-mails. If you are sending information to a large group and it contains a personal e-mail address, consider if the recipient has given permission for this address to be used.

Personal data can fall into the wrong hands if it is sent to an incorrect e-mail address, so carefully check all e-mail addresses before sending. Don't rush, take a few moments to check the addresses before you click Send to save the time and worry of helping the Data Protection Team in an investigation.

Top Tips:

1. Take care when writing e-mails – the contents may be used/requested by the individual concerned or read by others.
2. Avoid being subjective and critical of an individual in an e-mail or attachments. Be objective and factual.
3. Before sending an e-mail, double-check that the recipients' e-mail addresses are correct, and for common names, that it's the right individual. Once you have clicked 'Send' it is rarely possible to retrieve an e-mail.

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4. All NCG staff and students are in one address book so it's easy to choose the wrong person if there are 2 or more people with the same name. Remember, students will always have their student number in their e-mail address.
5. Consider using the Bcc field when you send an e-mail to a number of recipients that includes external or personal e-mail addresses.
6. Be clear to the recipient whether an e-mail is confidential or whether it should not be forwarded to others.
7. Make the title of the e-mail appropriate to the contents, but do not include personal data.
8. Only send e-mails to those who really need it. Remove unnecessary threads and be careful when using 'reply to all.'
9. Ensure any attachments that contain information that has been deleted has been done in a permanent way which cannot be reversed by the recipient.
10. Always password protect attachments containing highly sensitive information or use a more appropriate and secure method to share the data e.g. OneDrive or an appropriate network share.
11. Send passwords for protected attachments via a different medium if possible e.g. a phone call or text message.
12. Avoid saving e-mails containing personal data once the information has been stored in a more appropriate and secure place.
13. Delete e-mails that you no longer require to avoid duplicates of personal data sitting in your mailbox. Don't forget your sent items.
14. If you regularly share documents with the same person, consider not using e-mail at all and use your NCG OneDrive instead. This reduces duplicates too and simplifies the data you are storing into a single copy.

If you have any questions about e-mail security or transmitting personal data securely, contact the Data Protection Team via dpo@ncgrp.co.uk