



TOWN OF POUCH COVE

EMAIL POLICY

1. BACKGROUND

Email is one of the most common forms of communication in Newfoundland and Labrador Municipalities including the Town of Pouch Cove. Town Council, administration, and workers use email daily to share important information, facilitate key decisions, and direct day-to-day operations. Yet, email often seems to be overlooked in terms of business records that need to be retained (as evidence of the Town's decisions and operations) or as transitory records that need to be disposed of (as unnecessary digital clutter that has outlived its value), as are outlined in the Town's Record Management Policy. Not managing email properly introduces the Town to several risks; in the case of not retaining business emails, the Town may encounter an inability to defend itself in the event of litigation and/or inefficiencies in its operations due to a lack of knowledge transfer. In the case of not disposing of transitory emails, the Town may encounter a situation where sensitive information is exposed in a security incident and/or Town Users must divert a significant amount of time and effort from their day-to-day operations to respond to an access to information request.

Following this policy will help to mitigate these risks while also offering several benefits to Town users, specifically shared knowledge and understanding of the Town's decisions and operations and the ability to find and retrieve the information needed in a timely and efficient manner.

2. PURPOSE

This policy outlines requirements for the proper creation, management, and disposal of email records in accordance with the *Access to Information and Protection of Privacy Act, 2015*, and the Town's Records Management Policy. It provides necessary guidance to users on effectively managing email as official records, ensuring they serve as reliable evidence of the Town's functions, activities and transactions.

3. SCOPE

This policy shall apply to all employees, elected officials, contractors, consultants, partners, students, temporary workers, volunteers, vendors, agents, third parties and other persons working on behalf of the Town (hereafter referred to as "Town Users"). It shall also apply to any and all emails collected, created, and/or received in the conduction of Town business, regardless of the email account used.

4. DEFINITIONS

- 4.1 Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015)** is the provincial legislation that governs access to public records and the collection, use, disclosure, protection, and retention of all personal information by public bodies in Newfoundland and Labrador. It establishes requirements to ensure transparency while safeguarding individuals' privacy
- 4.2 Archive** shall refer to records that have been determined to possess enduring administrative, legal, fiscal, evidential, or historical value and are preserved for long-term or permanent retention
- 4.3 Authenticity** shall refer to a record that can be proven to be what it purports to be, to have been created and/or sent by the person purported to have created and/or sent it, and to have been created and/or sent at the time purported to have been sent.
- 4.4 CAO** shall refer to the Chief Administrative Officer of the Town of Pouch Cove

- 4.5 Compliance** shall refer to the set of activities and processes that result in meeting and adhering to applicable legislation, rules, and codes of professional conduct, as well as the Town's policies and procedures
- 4.6 Confidential information** shall refer to information in the custody and/or control of the Town that is prohibited from disclosure pursuant to legislation or court order or any other information that pertains to the business of the Town generally considered to be of a confidential nature, including, but not limited to:
- 4.6.1 Any matter that falls under the exceptions to disclosure identified in the Access to Information and Protection of Privacy Act (ATIPPA, 2015), whether or not a request for access has been made,
 - 4.6.2 Personal information which would constitute an unreasonable invasion of privacy,
 - 4.6.3 Potential acquisitions or disposition of real property,
 - 4.6.4 Information which would reveal the substance of deliberation of a closed meeting,
 - 4.6.5 Pending contracts including tenders, requests for proposals (RFPs), and records related to potential procurement,
 - 4.6.6 Draft documents and legal instruments including reports, policies, bylaws, and resolutions that have not been the subject matter of deliberation in a meeting open to the public,
 - 4.6.7 Employment and collective bargaining matters,
 - 4.6.8 Legal matters,
 - 4.6.9 Law enforcement matters.
- 4.7 Council** shall refer to the Town Council continued or incorporated under the TLSDA
- 4.8 Councillor** shall refer to and include a Mayor and a Councillor of a Town Council
- 4.9 Destruction** shall refer to the process of permanently eliminating or deleting records, beyond any possible reconstruction
- 4.10 Disposition** shall refer to the final action taken with respect to a record following the expiration of its approved retention period, including destruction, transfer to archives, or transfer to another authorized repository in accordance with the Town's RRDS
- 4.11 Email** shall refer to any messages created, sent, and/or received electronically between electronic devices over a network, inclusive of all items contained within an email account, including, but not limited to, messages, invites, calendar items, tasks, contacts, notes, attachments, and all email metadata
- 4.12 Employee or Employees** shall refer to any individual under an employment contract with the Town of Pouch Cove including all members of staff, volunteers, contractors, all members of the Pouch Cove Volunteer Fire Department, and all members of Town Council
- 4.13 Integrity** shall refer to the assurance that information is accurate, correct, and authentic by using consistent methods the create, retain, preserve, distribute, and track information
- 4.14 Metadata** shall refer to short descriptive information about an email, document, or database such as its author, date and time created, length, language, and business unit owner
- 4.15 Municipality** shall refer to the Town of Pouch Cove and shall include all departments, boards, committees, agencies, employees, elected officials, contractors, volunteers, and the Pouch Cove Volunteer Fire Department, acting on behalf of the Town
- 4.16 Network** shall refer to a group of connected computers or devices that share data and resources. Networks can be wired or wireless, communicating between users, systems, and services
- 4.17 Personal Identifiable Information (PII)** shall refer to recorded information about an identifiable individual, as defined under applicable privacy legislation, including:
- 4.17.1 the individual's name, address, or telephone number,
 - 4.17.2 the individual's race, national or ethnic origin, religious or political beliefs or associations, or skin colour
 - 4.17.3 the individual's age, sex, sexual orientation, marital status, or family status,

- 4.17.4 an identifying number, symbol or other particular assigned to the individual,
 - 4.17.5 the individual's fingerprints, blood type or inheritable characteristics,
 - 4.17.6 information about the individual's health care status or history, including any disability,
 - 4.17.7 information about the individual's educational, financial, criminal, or employment history,
 - 4.17.8 the opinions of a person about the individual, and
 - 4.17.9 the individual's personal views or opinions, except where they are about someone else
- 4.18 Record** shall refer to any recorded information, regardless of physical form or characteristics, created, received, maintained, or used by the Town in the conduct of municipal business and which provides evidence of activities, decisions, transactions, and/or legal obligations
- 4.19 Records Retention and Disposal Schedule (RRDS)** shall refer to the approved corporate schedule that establishes the minimum retention periods, disposition requirements for municipal records, and how they will be archived or disposed of at the end of their lifecycle
- 4.20 Removable Media** shall refer to all media/records that are stored on external memory devices such as but not limited to USB drive, external hard drives, SD cards, or optical media and tapes
- 4.21 Shared Repository** shall refer to a centralized, shared digital space where authorized users access, store, manage, and retrieve documents, such as a shared drive or a SharePoint site
- 4.22 Transitory Record** shall refer to any record of a temporary usefulness that is not required to document Town business decisions, actions, transactions, or obligations and may be disposed of once its immediate purpose has been fulfilled
- 4.23 Town** refers to the Town of Pouch Cove.
- 4.24 Town Manager/Clerk** shall refer to a Town Clerk responsible for the day-to-day administrative activities of the Town
- 4.25 Town Users** shall refer to all employees, elected officials, contractors, consultants, partners, students, temporary workers, volunteers, vendors, agents, third parties, and any other persons working on behalf of the Town.

5. POLICY STATEMENTS

- 5.1** Emails created, sent, and received on behalf of the Town are the property of the Town
- 5.2** All emails, regardless of value, are disclosed by the Town in the event of a legal matter, audit, or access to information request
- 5.3** Town Users follow internal policies regarding the retention and deletion of emails
- 5.4** Deletion of email is prohibited when there is an anticipated or ongoing legal matter, audit, or access to information request
- 5.5** Town email content is expected to be professional and respectful in tone in accordance with the Town's protocols and Respectful Workplace and Harassment Policy
- 5.6** Personal or confidential information is to be shared minimally and limited to authorized recipients
- 5.7** Town Users shall make all reasonable efforts to protect emails as follows:
 - 5.7.1 Users shall not share Town-issued username or password
 - 5.7.2 Users shall not use Town-issued email address for personal use, unless otherwise authorized by the CAO, or to sign up for personal services (ie, social media, banking, shopping, etc.)
 - 5.7.3 Users shall always use technical safeguards (ie, encryption) where personal/confidential information is included
 - 5.7.4 User email accounts are accessed on secure Town-approved devices, unless otherwise authorized by the CAO
 - 5.7.5 Users shall ensure multi-factor authentication (MFA) is used when accessing email accounts
 - 5.7.6 Users shall only open emails or download attachments from known or trusted sources
 - 5.7.7 Users shall verify sources of information via direct person to person contact (ie, phone or direct messaging to known accounts) as needed

5.8 The following email practices are strictly prohibited:

5.8.1 Using Town email for personal business or unauthorized commercial activities

5.8.2 Sending discriminatory, offensive or harassing content

5.8.3 Sharing confidential information without authorization

5.8.4 Sending or receiving materials that violate Town policies or legal regulations

5.9 Emails related to Town decisions, financial records, or legal matters must be properly archived

5.10 The Town reserves the right to monitor email use for compliance

6. CREATING AND RECEIVING EMAILS

6.1 In the "To" field, specify the recipient(s) who must act upon or review the contents of the email

6.2 In the "Cc" field, specify the recipient(s) who must be kept informed of the contents of the email

6.3 In the "Subject" field:

6.3.1 Clearly and concisely state the purpose of the email

6.3.2 Insert one or more of the following labels, where appropriate:

6.3.2.1 "Action" to indicate the email has a task for the recipient(s)

6.3.2.2 "Confidential" to indicate the email is intended for the recipient(s) only

6.3.2.3 "For Approval" to indicate the email is seeking acceptance on an approach or deliverable

6.3.2.4 "For Review" to indicate the email is seeking evaluation of an approach or deliverable

6.3.2.5 "FYI" to indicate the email is intended for awareness and information purposes only

6.3.2.6 "Reply Required" to indicate the email is seeking a response from the recipient(s)

6.3.3 Aim for seven words or less

6.4 In the body of the email:

6.4.1 Limit the contents to a single subject or topic

6.4.2 State the email's purpose and the expectations of the recipient(s) in the first few sentences

6.4.3 Include enough detail that those not directly involved are able to understand the contents

6.4.4 Limit confidential or personal information to that required to proceed with operations

6.4.5 Wherever possible, link to the document(s) on the shared repository (ie, the shared drive or SharePoint Online Site) instead of attaching the document(s) to the email

6.4.6 Use headings, bullets, and/or numbered lists to break down complex contents as needed

6.4.7 Indicate a deadline for the action, review, approval, or reply required of the recipient(s)

6.4.8 Insert a standardized signature with name, position, department and contact information

6.4.9 Ensure the contents are complete and accurate and can be depended upon in the future

6.4.10 Ensure the contents are professional and respectful in tone

6.5 If the email includes any confidential or personal information, always apply one or more of the following safeguards:

6.5.1 "Encrypt" to convert contents into scrambled cipher text only the recipient(s) can decipher

6.5.2 "Do Not Forward" to prevent the recipient(s) from forwarding, printing or copying the contents

6.6 Prior to clicking "Send," verify the accuracy of the email addresses in the "To" and "Cc" fields

6.7 Prior to opening any email received or any attachment and/or link in any email received, evaluate the email for signs of phishing (ie, deceptive attempts to steal confidential, financial and/or personal information) by:

6.7.1 Verifying the sender's identity by:

6.7.1.1 Referring to a previous, legitimate email thread from the same sender

6.7.1.2 Using a search engine to visit the sender's official website

6.7.1.3 Contacting the sender directly using a known phone number or direct messaging platform

6.7.2 Hovering over any links to preview the full web address and check for any misspelled domains

6.7.3 Using a search engine to research unfamiliar websites before visiting them

6.7.4 Never disclosing usernames and/or passwords

6.8 Report a suspicious email received to the cybersecurity and/or IT team(s)

7. ORGANIZING AND STORING EMAILS

- 7.1** Use categories, folders, and/or a combination thereof to organize emails created and received in a way that facilitates their retrieval and future saving (ie, by client, function, project, etc.)
- 7.2** When you (1) create or (2) receive an email from outside the Town that (A) serves as a business record (ie, an email that documents evidence of the Town's decisions, functions, activities, transactions, and/or legal obligations or rights) and (B) is closed (ie, the matter has been dealt with and an outcome reached):
 - 7.2.1** Use the "Conversation Clean Up" feature to delete emails within the thread whose contents are fully contained in the final email, less those with any attachment(s)
 - 7.2.2** Save the remaining email(s) and any attachment(s) as a Portable Document Format (PDF) file to the shared repository (ie, the shared drive or SharePoint Online Site)
 - 7.2.3** After saving to the shared repository, permanently delete the email(s) in the email account
- 7.3** Use a consistent naming convention when saving an email that serves as a business record to the shared repository
- 7.4** Do not save multiple versions of any email serving as a business record to the shared repository, unless there are substantive differences. Ensure the saved version is the most complete

8. USING AND SHARING EMAILS

- 8.1** Only use or share email in a manner that is consistent with original purpose of creation or receipt
- 8.2** Do not share confidential or personal information obtained by or contained within email, except:
 - 8.2.1** as required by law; or
 - 8.2.2** as authorized by the Town
- 8.3** When deciding whether or not to use a distribution list:
 - 8.3.1** Only use a distribution list when absolutely necessary
 - 8.3.2** Ensure all members of the distribution list are authorized to receive the contents of the email
 - 8.3.3** If the distribution list includes many recipients, specify the distribution list in the "Bcc" field to reduce the risk of "Reply All" chains and include a sentence indicating to which distribution list the email was sent in its body (ie, "Email Sent to [Name of Distribution List]")
- 8.4** Only use "Reply All" to pose a question or provide a response that adds real value to all recipients
- 8.5** Only use "Forward" to share an email with Town Users who are authorized to view the contents
- 8.6** Do not use "Forward" to share a suspicious or unexpected email received from external senders without first verifying their legitimacy, as per section 6.7

9. RETAINING AND DISPOSING OF EMAILS

- 9.1** Retain emails that serve as business records in accordance with the retention period prescribed in the applicable Records Retention and Disposition Schedule (RRDS)
- 9.2** Do not delete any email containing content that is subject to a disposition hold due to an access to information request and/or discovery for legal proceedings
- 9.3** When you (1) create or (2) receive an email that (A) serves as a transitory record (ie, an email that does not document evidence of the Town's decisions, functions, activities, transactions and/or legal obligations or rights, is of little-to-no value and only has a temporary usefulness) and (B) has outlived its purpose:
 - 9.3.1** Verify the email does not contain content that is subject to a disposition hold
 - 9.3.2** Permanently delete the email in the email account
 - 9.3.3** Purge the email from the "Recover Deleted Items" folder in the email account
- 9.4** When an email that serves as a business record has fulfilled the retention period prescribed in the applicable RRDS, follow the Town of Pouch Cove's Records Disposition Procedure to dispose of the email (ie, securely destroy or transfer to the archives)

10. ROLES AND RESPONSIBILITIES

10.1 Chief Administrative Officer/Town Clerk

- 10.1.1 Oversee the implementation and maintenance of this policy
- 10.1.2 Provide orientation, training, tools, and/or ongoing guidance on email management to Town Users to support compliance with this policy
- 10.1.3 Authorize and/or issue equipment and tools to Town Users for the creation and receipt of emails (e.g., a Town-issued email account)
- 10.1.4 Identify, approve and designate storage locations (ie, the shared repository) for emails that serve as business records to be saved by Town Users
- 10.1.5 Monitor compliance and advise Town Council of any risks associated with non-compliance

10.2 Town Users

- 10.2.1 Create emails in accordance with this policy, Records Management Policy, and Respectful Workplace and Harassment Policy
- 10.2.2 Apply safeguards (ie, encryption) when sending confidential or personal information by email
- 10.2.3 Evaluate emails received for phishing or suspicious content before opening attachments or clicking links
- 10.2.4 Organize emails in categories, folders, or a combination thereof to support retrieval and saving
- 10.2.5 Save emails from internal creation or external sources that serve as business records to the shared repository once the matter(s) to which the email(s) relate are closed, as PDF files and with consistent naming
- 10.2.6 Use/share emails responsibly and appropriately, in a manner consistent with original purpose
- 10.2.7 Retain emails that serve as business records in accordance with the applicable RRDS
- 10.2.8 Do not delete emails subject to a disposition hold
- 10.2.9 Delete emails that serve as transitory records when they have outlived their purpose, first ensuring they are not subject to a disposition hold and are properly purged from email systems

10.3 Town Council

- 10.3.1 Approves and authorizes this policy
- 10.3.2 Promotes compliance with this policy

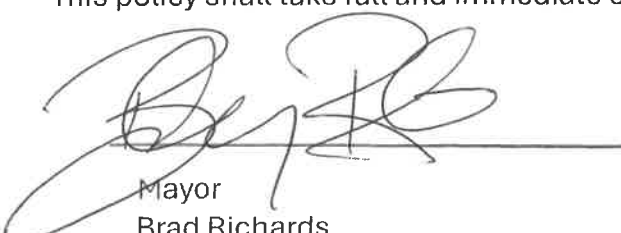
11. REVIEW

This policy is subject to review and modification as necessary to ensure it remains compliant with current legal standards and aligned with the overall mission of the Town of Pouch Cove. Violations of this policy may be subject to corrective action. This policy will be reviewed and updated annually and may be amended as required at any time between scheduled reviews.

12. AMENDMENTS

13. EFFECTIVE DATE/RESOLUTION

This policy shall take full and immediate effect as of Aug 24, 2026.


Mayor
Brad Richards


CAO
Rodney Hynes

Aug 24, 2026
Date

August 24, 2026
Date