Responsibility:	*Superintendent, Student Achievement & Well-Being* *Senior Manager, Information Technology Services* *Freedom of Information, Privacy and Records Information Management Officer*
Legal References:	*Municipal Freedom of Information and Protection of Privacy Act*
Related References:	*Municipal Freedom of Information and Protection of Privacy Act Procedure 1100* *AP 1104 - Privacy Breach Protocol* *AP 1102 - Freedom of Information Request Protocol*
Revisions:	*June 2019*
Reviewed:	June 2019

1. Preamble

1.1 The use of electronic mail (e-mail) to conduct Board business and facilitate student learning is a common practice. The Waterloo Region District School Board provides e-mail accounts to staff and students as a normal and regular part of account creation.

2. General

2.1 The increasing use of e-mail as a business and collaboration tool carries with it a need to be cognizant of appropriate safeguards of personal privacy. Staff and students must be aware that the creation of an e-mail constitutes the creation of a record for the organization. As such, the records may become subject to disclosure during a Freedom of Information, or other, request.

2.2 "Personal information" is defined in the *Municipal Freedom of Information and Protection of Privacy Act* (Section 2 (1)) as "recorded information about an identifiable individual, including,
   (a) information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
   (b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
   (c) any identifying number, symbol or other particular assigned to the individual,
   (d) the address, telephone number, fingerprints or blood type of the individual,
   (e) the personal opinions or views of the individual except if they relate to another individual,
   (f) correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
   (g) the views or opinions of another individual about the individual, and
   (h) the individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual."

3. Guidelines for the Use of Staff E-mail

3.1 Staff are reminded that any e-mail sent using the Board's e-mail system constitutes a record of the Board, and as such, should not be considered private. Any e-mail is subject to search and disclosure (see section 6).

3.2 Staff using Board e-mail need to be aware of and respect an individual's right to privacy. While it may be necessary to share personal information about an individual during the normal course of doing business, care needs to be taken that only pertinent and factual information is included in the message.

3.3 Personal information about an individual must never be put in a public e-mail group. A public group is one that is found in the "Public Groups" folder and is accessible to any employee with a Board e-mail account. When in doubt, it is always better to send the message directly to a personal mailbox.

3.4 Keep subject lines short and clear, using consistent naming conventions when possible. This will help both you and the recipient find information and quickly identify relevant emails.

3.5 E-mail messages that contain personal information should only contain factual information. Remembering that e-mail messages may be subject to search and disclosure, care should be taken to keep the tone and contents of the e-mail professional at all times.

3.6 Privacy breaches occur when personal information is compromised when it is collected, used, disclosed, retained or destroyed in a manner inconsistent with privacy legislation. If staff have reason to believe that a privacy breach has occurred, the staff person shall immediately notify their immediate supervisor and the Freedom of Information, Privacy and Records Information Officer. More information on privacy breaches can be found in AP 1104 – Privacy Breach Protocol.

3.7 Staff who retire or are terminated will have their account disabled after notification is received from Human Resource Services. Staff who retire from their current position, but who continue to work for the Board in another capacity (e.g. as an occasional teacher or under contract for a special project), will be removed from school or department groups, but may retain access to their personal mailbox and to public groups.

4. **Guidelines for the Use of Student E-mail**

4.1 It is the responsibility of the principal and teachers to ensure that any student using a Board supplied e-mail account is aware of the need to be responsible in the use of this tool. Proper e-mail etiquette must be followed at all times (see section 5).

4.2 The Principal and teachers must advise students that any e-mail sent using the Board's e-mail system constitutes a record of the Board, and as such, should not be considered private. Any e-mail is subject to search and disclosure (see section 6).

4.3 Google Groups for student use as collaboration tools or to disseminate information may be created at the discretion of the teacher, in conjunction with the school administrator.

4.4 The Principal and teachers must instruct students in the need to protect on-line privacy, both their own and that of other students.

4.5 The student Data Verification Form and Student Registration Form contain an acknowledgement, signed by the parent/guardian/adult student, that students will be provided with an e-mail account.

4.6 Student e-mail addresses must never be shared by staff outside of classroom communities (i.e. with the public or with parents who are not the parent/legal guardian of the student).

4.7 Privacy breaches occur when personal information is compromised when it is collected, used, disclosed, retained or destroyed in a manner inconsistent with privacy legislation. If students have reason to believe that a privacy breach has occurred, the student shall immediately inform their

teacher. The teacher shall inform their administrator, who shall immediately notify their Superintendent and the Freedom of Information, Privacy and Records Information Officer. More information on privacy breaches can be found in AP 1104 - Privacy Breach Protocol.

5.   Common E-mail Rules, Best Practices and Etiquette

5.1   E-mail as a tool should be used in conjunction with the Board's Responsible Use Procedure for staff and students and the Board's Code of Digital Conduct.

5.2   There are some generally-accepted practices and etiquette considerations when using e-mail that should be followed by staff and students:
   ● **Appropriate Tone and Content**: Messages should be professional, courteous and respectful at all times. It is necessary to keep e-mail messages within the bounds of good taste and free of obscenities. Topics of a volatile or controversial nature should be dealt with maturely, realizing that points of view can, and will, vary. If a message is created "in the heat of the moment", be aware that it is difficult to convey emotion in an e-mail and your message may be open to misinterpretation. Sometimes "sleeping on it", or having someone read your message before it is sent will allow the message to be reviewed more objectively.
   ● **Spamming**: Spamming is the sending of the same message to a large number of users or a large number of groups, and is not allowed. The forwarding of chainmail-type messages would be included in this category.
   ● **Flaming or Name-calling**: A flame is a personal attack on an individual. Flames or name-calling are not allowed. Although it is fine to disagree with someone, the tone of the message must remain polite and respect the views of others.
   ● **Shouting or Yelling**: Shouting or yelling occurs when messages are typed with the "caps lock" key down. While capitalizing a single word or two for emphasis may be appropriate, shouting conveys the wrong emotion and makes the message more difficult to read.
   ● **"Reply All" vs. "Reply Sender"**: When replying to a message that has been sent to multiple recipients, determine whether your reply should be received by everyone, or only by the sender, and adjust your recipients accordingly.
   ● **Subject lines on Messages**: Messages should have a subject line to allow readers to determine the content of your message. When replying to a message, consideration should be given as to whether the original subject line is still appropriate. If not, the subject line should be changed to something that better reflects the message contents.
   ● **Use of cc: and bcc:** The use of cc: (carbon copy) is intended to alert someone to a message. The person who is carbon copied on a message should not expect to have to reply. If a response is required, then the recipient's name should appear in the To: line. Blind carbon copy (bcc:) is used when you wish to hide the names of the recipients from one another. The sender of the message can see the entire list of recipients, but the blind carbon copied recipient can only see their name and the name of the sender. This tool can be useful when you need to send the same message to a number of people, but the contents are of a personal nature. The sender should send the message to themselves, with the names of the other recipients in the bcc: area.

5.3   E-mails should be written in at least 11 point font size to ensure readability. Highly-decorative or elaborate fonts should be avoided, as they are often difficult to read. Non-standard fonts should be avoided, as the recipient may not have the same font on their computer, and the substituted font may not produce quality results. Black is the preferred font colour, however, if another colour is used, ensure that it is dark enough to be read easily on-screen and that it is dark enough to print legibly.

5.4   All staff e-mail should include an e-mail "signature", which includes the person's name, title, location and contact information. Signatures may include a brief personal quotation, but it must be remembered that this is a business communications tool, so quotations must be short, appropriate and within the bounds of good taste.

5.5   It is strongly suggested that staff include a disclaimer in the signature area of their e-mail. This disclaimer would help to protect the Board and the sender if the message was misdirected. The

disclaimer should say *"This message contains confidential or privileged information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed, therefore, the sender does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. The recipient should check this e-mail and any attachments for the presence of viruses."*

5.6   Although the Board's firewall and content filtering programs scan incoming e-mails for the presence of viruses, occasionally one may slip through. If you receive a suspicious e-mail, it should be deleted from your mailbox. Do not download or open any attachments. If you are unsure, contact the sender and verify that they sent the message.

5.7   An e-mail sent to you should not be forwarded to another person or group without first notifying the originator that you will be doing this.

6.   Search and Disclosure of E-mail by Board Staff

6.1   In response to a Freedom of Information or other request, staff and/or student e-mail can be searched. Staff and students should not have an expectation of privacy when using the Board e-mail system.

6.2   If e-mail is being disclosed in response to a Freedom of Information request, the staff member or parent/guardian/adult student will be notified and sent a copy of the e-mail that is being sent to the requester. If the e-mail contains potentially sensitive information, the staff member or parent/guardian/adult student will have the opportunity to object to the release of the information, within the guidelines defined in current privacy legislation.