



**Series:** 1100 Information Technology

**Policy Name:** E-Mail Systems

**Policy Number:** 1105

**Origination Date:** 6/22/2015

**Revision Date:** July 1, 2018

**Policy:** The purpose of the Communities Connected for Kids e-mail system is to provide a means to conduct company business and to provide a method of communication with employees and Independent Contractors. This policy identifies the principles for access and proper use of Communities Connected for Kids e-mail services and applies to all e-mail users within Communities Connected for Kids regardless of location. All Communities Connected for Kids personnel and Independent Contractors are required to comply with Communities Connected for Kids policies and must observe applicable laws relating to personal data, Communities Connected for Kids data, public records, copyright and other forms of intellectual property. All Communities Connected for Kids personnel and Independent Contractors are expected to take reasonable precautions to protect e-mail information and systems against unauthorized access, illegal and inappropriate use, misuse of information and facilities, disclosure, modification, duplication and/or destruction.

**Procedure:** The Communities Connected for Kids E-mail systems are corporate assets and critical components of communication systems, and are provided by the company for employees and Independent Contractors to facilitate the performance of their jobs and provision of services. All content and data that are created, sent or received using the company's e-mail system are the property of the company. The company reserves the right to access and disclose the contents of all messages created, sent or received using its e-mail system. The Information Systems department is responsible for creating and updating this policy and for maintaining the operation of the e-mail systems.

#### **Usage:**

E-mail is a valid mechanism for official communication. Official e-mail communications are intended to meet the administrative needs of the Communities Connected for Kids community and may be used to communicate official business that is critical to the operation and function of the institution. All Communities Connected for Kids employees are expected to have an official Communities Connected for Kids e-mail account. Independent Contractors may be authorized to have a Communities Connected for Kids e-mail account.

Employees are expected to check their e-mail on a regular basis in order to stay current with Communities Connected for Kids -related communications. Managers that have exempted employees from the requirement of having an official e-mail account must make arrangements for alternative methods of access to official communications.

Employees may not retrieve or read e-mail that is not theirs, unless authorized by the company or they have been granted proxy rights by the e-mail recipient.

Use of the Communities Connected for Kids e-mail system is limited to employees and authorized vendors, temporaries, or Independent Contractors. Employees and authorized users are responsible to maintain the security of their account and their password. All external e-mail will include the approved Communities Connected for Kids Disclaimer statement.



### **Unacceptable Use of E-mail**

No copyrighted or company proprietary information is to be distributed by company e-mail unless approval has been granted by a company official and/or the legal department.

No personal or commercial messages, employee solicitations, or messages of a religious or political nature are to be distributed using company e-mail.

E-mail messages may not contain content that may be considered offensive or disruptive. Offensive content includes (but is not limited) to obscene or harassing language or images, racial, ethnic, sexual or gender specific comments or images or other comments or images that would offend someone on the basis of their religious or political beliefs, sexual orientation, national origin or age.

Automatic forwarding of all incoming e-mail to 3rd party commercial e-mail accounts (Comcast, Verizon, Yahoo, Google, Hotmail, etc) is not permitted.

IMAP/POP3 (transmitting email to an external e-mail client or device) access is only allowed if approved by Executive Risk Management and sent to a CCKIDS-approved end device (such as Blackberry). Approval should be on record in the form of an e-SAR.

Company confidential messages may be distributed to company personnel only. Unauthorized use of a password/mailbox is prohibited.

### **Non-Business E-mail**

Incidental and occasional personal use of electronic mail is permitted. Such messages become the property of the company and are subject to the same conditions as company e-mail.

Personal e-mail should not interfere with or conflict with business usage or job duties. Personal e-mail is subject to the same rules and policies as business email.

### **Violations**

Violations of this policy may result in disciplinary action up to and including termination and/or legal action if warranted. Corporate Information Systems, in consultation with Corporate Human Resources, will consult with Communities Connected for Kids' Legal department when needed to address violations.

Employees and Independent Contractors should report any misuse of the company e-mail system or violations of this policy to the center Security Officer.

### **Accountability and Legal Process**

E-mail messages, whether personal or business-related, sent from any Communities Connected for Kids system, may be accessed as 'documents' under the Freedom of Information Act and may therefore, be subject to external scrutiny. Additionally, e-mails (whether personal or business related) may be tendered in court as evidence and are subject to legal processes such as disclosure and subpoena. Unlike regular mail, the e-mail sender should know that the e-mail environment provides no expectation of privacy. Also, e-mail servers and messages are backed up on a



regular basis and can be recovered from these back-ups. The deletion of an e-mail message from the e-mail account does not remove the backed-up copy. E-mail messages are logged. These logs include e-mail sender and recipient addresses, time of transmission and the content of the e-mail. These logs are necessary for auditing e-mail traffic as well as routine maintenance and management of the e-mail service. Finally, because of federal privacy laws relating to personal health information, (PHI), e-mail may not be used to send such information external to Communities Connected for Kids unless properly encrypted..

### **Auditing and Monitor**

Monitoring and auditing activities may include, but are not limited, to the following:

Access and examination of specific types of messages e.g. large messages or messages containing executables, audio visual files, movie files, command files and/or pictures, in order to identify inappropriate use or to maintain system performance.

Access and examination of messages in specific circumstances, such as where an individual's message volume is high or at the peak periods or on a random sampling basis, in order to identify inappropriate use or to maintain system performance.

Access, examination and referral of e-mail messages for the purpose of complying with investigation requests received from Human Resources, Legal, Internal Audit, Crime and Misconduct Commission, Freedom of Information, Senior Management or other authorities;

Access, examination and referral of e-mail messages for good cause or to satisfy legal obligations, in compliance with legislative requirements, Federal and State laws, and Communities Connected for Kids policies. Good cause includes the need to protect system security, identify inappropriate use and protect the rights and property of the department.

Approved: Carol Deloach

Carol Deloach, CEO

July 1, 2018