

Electronic Communications (E-mail Quarantine) Policy

Policy expert	Information Services Manager
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Policy owner	Group Manager People and Culture
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Owner Department	Information Management
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Approval date	11 October 2017 – Reviewed January 2021
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1. Introduction

1.1. Purpose

The purpose of this policy is to ensure Council staff and elected members are protected from inappropriate e-mail correspondence while ensuring Council has robust processes around the quarantining of e-mails and to ensure it is transparent in how it applies the policy.

1.2. Scope

This policy applies to all e-mail correspondence to and from Council's e-mail domain (including Aquatics and Library Services) whether solicited or not.

1.3. Commencement

This policy came into effect on 12 October 2017.

1.4. Definitions

The following definitions apply to this document:

Term	Definition
Council	means Horowhenua District Council.
Elected Member	means a member of the governing body of Council or community board elected under the Local Electoral Act 2001 (His Worship the Mayor, Councillors and Community Board Members).
Foul or offensive language	means words, whether intended or not, that offend, intimidate, or otherwise cause emotional or psychological harm to the recipient and/or staff and includes content that incites hatred against, promotes discrimination of, or disparages an individual or group on the basis of their race, ethnic origin, religion (or lack thereof), disability, age, nationality, veteran status, sexual orientation, gender, gender identity, or other characteristic that is associated with systematic discrimination or marginalisation.
Inappropriate or explicit imagery	means pictures, images or videos containing or promoting violent language, gruesome or disgusting imagery, graphic images of physical trauma, gratuitous portrayals of bodily fluids or waste, foul or offensive language, cruelty or gratuitous violence towards animals and/or pornographic images.
IT and information Services Manager	includes members of the Information Services and IT Team who, from time-to-time, are delegated responsibilities under this policy.

Privacy Officer	means a staff member appointed as a Privacy Officer pursuant to section 23 of the Privacy Act.
Senior staff member	means a staff member who is a member of Council's Senior Management Team or has been designated as a 'senior staff member' by Council's Chief Executive Officer for the purpose of this policy.
Staff member	means an employee or agent of Council and does not include elected members.
Quarantine list	means a list, in any form and in one or more parts, of individuals and their e-mail address/es who have breached this policy and a decision has been made to quarantine e-mails from those individuals under this policy.

- A reference to any law, legislation or legislative provision includes any statutory modification, amendment or re-enactment, and any subordinate legislation or regulations issued under that legislation or legislative provision.
- Where the context requires or admits, words importing the singular will import the plural and vice versa.
- References to sections and schedules are references to sections and schedules of this policy.

2. Procedure

2.1. Misuse of e-mail correspondence

Council accepts the benefits of e-mail correspondence when used appropriately. However, it is not acceptable for anyone to use e-mail to unduly interfere with staff and their decision-making processes, to criticise staff, or to simply abuse and harass staff. Due to the instantaneous nature of e-mails, significant criticism, abuse and harassment can occur in a relatively short period of time.

Council recognises the importance of the Harmful Digital Communications Act 2015 and the communication principles contained within. A copy of these principles is annexed to this policy. While this policy focuses on specific aspects of the principles, it does not limit Council's ability to refer e-mails which breach other communications principles to an approved agency under that Act (for instance, NetSafe).

Council has three categories of misuse of e-mail correspondence, they are:

- **Minor breach** being general name calling;
- **Major breach** being the use of foul or offensive language; the dissemination of confidential information (whether or not that person has legitimately obtained that information); and/or inappropriate or explicit imagery; and

- **Extreme breach** being threatening or explicit commentary; and/or the use of foul or offensive language and/or inappropriate or explicit imagery that is targeted at a specific staff member (whether or not that staff member is the recipient of the e-mail).

For clarity, criticism of a staff member or Council does not, on its own, constitute a breach of this policy.

If there is any question as to whether a breach is a breach or a minor, major or extreme breach a Privacy Officer will make a determination which shall be final.

2.2. Consequences of misuse of e-mail correspondence to staff members

In the event of misuse of e-mail correspondence Council will:

In the case of a **minor breach**, the staff member receiving the e-mail may either:

- choose to ignore the breach; or
- refer the e-mail to a Privacy Officer with the staff member's manager cc'd in; and
- the Privacy Officer will ensure a record is kept of the referral from the staff member and the relevant e-mail itself and will send an e-mail to the person who breached this policy in accordance with the templates provided in the First Schedule

In the event of **three minor breaches** within a 12 month period, any further minor breach will be treated as a **major breach** and Council's Privacy Officer will send an e-mail to the person who breached this policy in accordance with the templates provided in the First Schedule.

In the case of a **major breach**, the staff member receiving the e-mail may either:

- choose to ignore the breach; or
- refer the e-mail to a Privacy Officer with the staff member's manager cc'd in; and
- the Privacy Officer will ensure a record is kept of the referral from the staff member and the relevant e-mail itself and will send an e-mail to the person who breached this policy in accordance with the templates provided in the First Schedule.

In the event of **three major** breaches within a 12 month period, the sender will be placed on Council's quarantine list and a Privacy Officer will send an e-mail to the person who breached this policy in accordance with the templates provided in the First Schedule.

In the case of an **extreme breach**, the staff member receiving the e-mail **must**:

- refer the e-mail to a Privacy Officer with the staff member's manager cc'd in; and
- the Privacy Officer will ensure a record is kept of the referral from the staff member and the relevant e-mail itself and will send an e-mail to the person who breached this policy in accordance with the templates provided in the First Schedule; and
 - if the extreme breach is the first and only breach from that individual then the e-mail will be sent advising that any further breaches will result in that person's name being placed on Council's quarantine list; or

- if the extreme breach is the second or subsequent breach (regardless of whether the previous breach was minor, major or extreme) from that individual then that individual will be placed on Council's quarantine list and an e-mail will be sent to the individual informing them of this.

Once an individual has been placed on the quarantine list, no further correspondence is required to be sent for subsequent breaches.

2.3. Consequences of misuse of e-mail correspondence to elected members

E-mails sent to elected members (His Worship the Mayor, Councillors and Community Board members) are not subject to Council's quarantining process.

If an e-mail to an elected member does get quarantined as a result of a decision to quarantine e-mails from a specific e-mail address to staff members, then that e-mail will, upon its discovery, be immediately released to the elected member/s the e-mail is addressed to.

Elected members may, in their absolute discretion, choose to 'block' an e-mail address or to redirect e-mails from an individual to their 'spam', 'junk mail' or other folder of their choosing using standard e-mail settings. In deciding whether to 'block' and e-mail address or redirect e-mails from an individual, an elected member should follow the same process contained in section 6.

It is for the elected member to decide whether and how to communicate their actions to the individual/s concerned. However, the elected member should follow the same process as set out in section 6.

Elected members will refer e-mails received which breach this policy, and which the elected member has chosen not to ignore, along-with details of action taken to the Governance and Executive Support Team Leader for referral to a Privacy Officer so that a record may be kept of the breach and action taken for reporting purposes.

Elected members may request support from, and that support will be provided by, Council's IT Team to block an e-mail address or have e-mails from a specific address redirected to the elected member's 'spam', 'junk mail' or other folder using standard e-mail software (e.g. Microsoft Outlook). Requests for support by elected members are to be sent to the Governance and Executive Support Team Leader for referral to the IT Team.

Staff members will not comment on any decision of an elected member to block an e-mail address or redirect e-mails from a specific address with the exception that a staff member may refer an individual to this policy and this section in particular.

2.4. Effect of quarantine list

Following an individual's name being placed on Council's quarantine list, any e-mails received by Council, for staff attention, from that individual will, for a period of six months:

- initially be redirected to a separate and restricted electronic storage location;
- be reviewed by a Privacy Officer and, if appropriate, escalated to the Group Manager People and Culture and/or Chief Executive Officer and a decision made as to whether the e-mail will:
 - be released in its complete form to the intended recipient/s; or

- be released to the intended recipient/s with breaches of this policy redacted/removed; or
- not be released to the intended recipient/s but specific questions and/or comments will be provided to the intended recipient/s or another staff member for a response by the intended recipient/s of the original e-mail or another staff member; or
- not be released and will not be responded to as the e-mail contains no legitimate business content.

The six month quarantine period is to be calculated from, and includes, the day the individual is placed on the quarantine list.

2.5. End of quarantine period

At the end of the quarantine period, Council's Chief Executive Officer may, following a referral by a Privacy Officer, instruct a Privacy Officer to extend an individual's quarantine period for a period of no more than six months, where:

- During the quarantine period, the individual has continued to send e-mails which contain **minor, major** and/or **extreme breaches**; and
- The last e-mail sent containing a **major** or **extreme breach** was received by Council within three calendar months of the end of the quarantine period.

The quarantine period may continue to be extended for multiple periods of no more than six months until such time as the above criteria for extension are not met.

If the quarantine period is not extended under the above provisions, the individual's name will be removed from the quarantine list and the quarantining of e-mails for that individual will cease. This policy will then apply to that individual as if they had not previously breached the policy and been on the quarantine list.

2.6. Internal reporting requirements

HDC's Information Services Manager, in conjunction with all Privacy Officers, is responsible for ensuring the following records are kept and are readily accessible:

- Copy of e-mails forwarded under this policy;
- Copy of staff e-mails referring the above e-mails;
- Name of persons and associated e-mail addresses on the quarantine list;
- Where persons have been placed on the quarantine list, the reasons for the quarantine;
- Date when persons were placed on the quarantine list;
- Date when persons are due to be removed from the quarantine list;
- Date when persons had their quarantine extended;
- Where persons have had their quarantine extended, the reasons for the extension; and
- Date when persons were removed from the quarantine list.

Council's Privacy Officer is responsible for ensuring the following records are kept and are readily accessible:

- Name of persons and associated e-mail addresses quarantined;
- Date when persons were quarantined; and
- Date when persons are due to be removed from the quarantine list.

Records must be kept for sufficient time to ensure compliance with Council's Information Management Policy and associated legislation and legislative instruments.

The Privacy Officer will report to the Chief Executive Officer whenever a person has been placed on, or is due to be removed from, the quarantine list.

2.7. FAR Subcommittee reporting requirements

The Chief Executive Officer will report to the Finance, Audit and Risk ("FAR") Subcommittee as to the operation of the quarantining system as required. The report will include:

- The total number of individuals on the quarantine list;
- Reasons for those individuals in terms of breaches committed.
- The length of time individuals have been on the quarantine list;
- The length of time until individuals are removed from the quarantine list;
- The number of individuals who have had their quarantine period extended, the length of the extension and the reason(s) for the extension;
- The total number of breaches which have occurred for the current financial year to date;
- The total number of complaints received under this policy;
- Non-identifying details of the complaints received (for example, 'complaint that alleged breach was not a breach');
- The number of complaints found to be justified; and
- Details of any breaches which have been referred to external authorities (e.g. NZ Police) and the outcome of those referrals.

No identifying details or information which would lead to the identification of the individuals on the quarantine list will be reported to the FAR Subcommittee regardless of whether or not elected members are aware of specific individuals on the quarantine list.

2.8. Complaints

Individuals who are alleged to have breached this policy and have received an e-mail or letter from Council acknowledging the breach may complain to the Chief Executive Officer on the grounds that:

- The alleged breach was not a breach of this policy;
- The alleged breach was of a lower category than that reported;
- The complainant was incorrectly placed on the quarantine list;
- The complainant was due to be removed from the quarantine list and has not been removed;
- or
- There is any other non-adherence to this policy.

The Chief Executive Officer must refer an investigation to the Independent Chair of the FAR Subcommittee where the Chief Executive Officer's actions are the subject of the complaint.

Complaints are to be acknowledged within 5 working days of receipt.

Complaints are to be investigated and communicated to the individual within 10 working days of receipt of the complaint unless circumstances mean this is not practicable. Where a complaint cannot be investigated within 10 working days, the complainant is to be informed of the delay along with the reason for the delay.

Where a series of complaints show a systematic failure, steps will be taken to prevent a repeat of that failure. Such steps may include:

- Staff training;
- Amendment to this policy; and/or
- Amendment to process.

3. Effect on Secure E-mail Gateway software

This policy has no effect on the use of Council's Secure E-mail Gateway software which is utilised to quarantine e-mails that contain spam, pornographic and sexually explicit words and phrases and common and mild profanity.

4. Effect on Privacy Act and LGOIMA

This policy has no effect on an individual's rights or Council's obligations under the Privacy Act or Local Government Official Information and Meetings Act 1987. Council will ensure it continues to meet its obligations under these Acts.

5. Referral to Relevant Authorities

This policy does **not** limit Council's ability to refer electronic communications, including e-mails, to the relevant authorities (for example, NetSafe or the New Zealand Police). Matters for referral will be assessed on a case-by-case basis.

6. Related Documents

- Electronic Communications Policy
- Information Management Policy
- Privacy Act 2020
- Local Government Official Information and Meetings Act 1987

7. Policy Review Process

To provide a consistent approach to the development, approval, implementation and review of Council's operational policy documents, the Operational Policy Framework Policy outlines the process for future reviews, including links to related documents e.g. templates, guidelines and Promapp processes.

[Policy - Operational Policy Framework Policy - 5 August 2019](#)

This policy was adopted by resolution of Council at its Ordinary Meeting on 11 October 2017. It was reviewed in January 2021 with only minor amendment.

8. Appendices

- A. First Schedule – E-mail Templates
- B. Communication Principles

Appendix A

First Schedule – E-mail Templates

Template 1: Minor breach reported (first or second)

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

Your e-mail contains a **minor breach** of this policy, specifically: *[Insert relevant words &/or detail breach, use of asterisks may be required]*

If staff members report three or more minor breaches of this policy (including this breach) by you within a 12 month period any further minor breaches will be treated as major breaches under the policy for a period of 12 months.

Continual breach of this policy may result in your name and associated e-mail addresses being placed on Council's quarantine list. E-mail addresses on the quarantine list are subject to review by a senior member of staff upon receipt and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

Yours faithfully,

[Signature Block]

Template 2: Three minor breaches resulting in escalation to major breach

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

Within the last 12 months, staff members have reported three or more **minor breaches** of this policy by you. Accordingly, for the next 12 months commencing on XX Month 20XX any further **minor breach** by you will be treated as a **major breach** under the policy.

The events reported include:

- XX Month 20XX e-mail to [e-mail address] and the words: *[Insert relevant words &/or detail breach, use of asterisks may be required]*
- XX Month 20XX e-mail to [e-mail address] and the words: *[Insert relevant words &/or detail breach, use of asterisks may be required]*

- XX Month 20XX e-mail to [e-mail address] and the words: *[Insert relevant words &/or detail breach, use of asterisks may be required]*

In the unfortunate event that you commit a further two major breaches, or a single extreme breach, within the next 12 months and these are reported by staff, your e-mail address/es will be placed on Council's quarantine list. E-mail addresses on the quarantine list are subject to review by a senior member of staff upon receipt and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

Yours faithfully,

[Signature Block]

Template 3: First major breach where not an escalation of minor breaches

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

The content of your e-mail constitutes a major breach of this policy, specifically *[Insert relevant words &/or detail breach, use of asterisks may be required]*.

In the unfortunate event that a further two breaches of the Electronic Communications (E-mail Quarantine) Policy are reported within the next 12 months, your e-mail address/es may be placed on Council's quarantine list. This means any e-mails received from you by Council will be reviewed by a senior member of staff and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

Yours faithfully,

[Signature Block]

Template 4: Second major breach

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

The content of your e-mail constitutes a major breach of this policy, specifically *[Insert relevant words &/or detail breach, use of asterisks may be required]*. This is the second major breach reported within a 12 month period.

In the unfortunate event that a further breach of the Electronic Communications (E-mail Quarantine) Policy is reported between now and [Insert end of 12 month period in format XX Month 20XX], your e-mail address/es will be placed on Council's quarantine list. E-mail addresses on the quarantine list are subject to review by a senior member of staff upon receipt and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

Yours faithfully,

[Signature Block]

Template 5: Third major breach – on quarantine list

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

The content of your e-mail constitutes a major breach of this policy, specifically *[Insert relevant words &/or detail breach, use of asterisks may be required]*. This is the third major breach reported within a 12 month period.

As this is the third major breach reported within a 12 month period, your e-mail address will be placed on Council's e-mail quarantine list. This means any e-mails received from you by Council will be reviewed by a senior member of staff and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

You will remain on Council's e-mail quarantine list for a period of 6 months commencing XX Month 20XX and ending at 5.00 p.m. on XX Month 20XX. However, further breaches during this period may result in an extension to your quarantine period.

Yours faithfully,

[Signature Block]

Template 6: First extreme breach – no previous breaches

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

The content of your e-mail constitutes an extreme breach of this policy, specifically *[Insert relevant words &/or detail breach, use of asterisks may be required]*. This is the most serious type of breach under this policy.

As you have not previously breached this policy, your e-mail address will not be placed on Council's e-mail quarantine list. However, any further breaches of this policy will be treated as an extreme breach and will result in your e-mail address/es being placed on Council's quarantine list. This means any e-mails received from you by Council will be reviewed by a senior member of staff and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

Yours faithfully,

[Signature Block]

Template 7: First extreme breach following a previous breach – on quarantine list

Dear [Name],

We refer to your e-mail of XX Month 20XX. Council has a policy regarding misuse of e-mail correspondence, the Electronic Communications (E-mail Quarantine) Policy. A copy of this policy is **attached** to this e-mail and can also be viewed on Council's website www.horowhenua.govt.nz under the Local Bylaws & Policies section.

The content of your e-mail constitutes an extreme breach of this policy, specifically *[Insert relevant words &/or detail breach, use of asterisks may be required]*. This is the most serious type of breach under this policy.

As you have previously breached this policy, your e-mail address/es will be placed on Council's e-mail quarantine list. This means any e-mails received from you by Council will be reviewed by a senior member of staff and may be subject to:

- Release of the e-mail in complete form to the intended recipient;
- Release to the intended recipient with breaches of this policy redacted/removed;
- Specific questions being addressed to the appropriate staff member without release of the e-mail and a response being provided by the intended recipient or another staff member; or
- If there is no legitimate business content in your e-mail, Council may choose to ignore your e-mail in its entirety and provide no response.

You will remain on Council's e-mail quarantine list for a period of 6 months commencing XX Month 20XX and ending at 5.00 p.m. on XX Month 20XX. However, further breaches during this period may result in an extension to your quarantine period.

Yours faithfully,

[Signature Block]

Template 8: Quarantine period renewed for up to 6 months

Dear [Name],

As you will be aware you were placed on Council's quarantine list on XX Month 20XX. You were due to be removed from the quarantine list on XX Month 20XX.

During the quarantine period you have continued to send e-mails which constitute a breach of Council's Electronic Communications (E-mail Quarantine) Policy. This has included e-mails which would constitute a breach being sent in the last three months of your quarantine period.

Given your ongoing breaches, we have made the decision to extend your quarantine period for a further period of X months.

This is not a decision we make lightly. However, our staff must be protected from your ongoing behaviour.

At the end of the new quarantine period, a decision will be made as to whether or not to renew your quarantine period for a further period of up to six months. We trust this will not be necessary.

Yours faithfully,

[Signature Block]

Template 9: End of quarantine

Dear [Name],

As you will be aware you were placed on Council's quarantine list on XX Month 20XX. You were/are due to be removed from the quarantine list on XX Month 20XX.

We are pleased to inform you that due to a lack of ongoing breaches of Council's Electronic Communications (E-mail Quarantine) Policy your name has been removed from Council's quarantine list and your e-mails to Council staff will no longer be quarantined upon receipt by Council.

We remind you that any further breaches may result in your name being returned to the quarantine list. We trust this will not be necessary and look forward to communicating with you in future.

Yours faithfully,

[Signature Block]

Appendix A

Communication Principles

The 10 Communication Principles

A digital communication shouldn't:

- 1 disclose sensitive personal facts about an individual;
- 2 be threatening, intimidating, or menacing;
- 3 be grossly offensive to a reasonable person in the position of the affected individual;
- 4 be indecent or obscene;
- 5 be used to harass an individual;
- 6 make a false allegation;
- 7 contain a matter that is published in breach of confidence;
- 8 incite or encourage anyone to send a message to an individual for the purpose of causing harm to the individual;
- 9 incite or encourage an individual to commit suicide; or
- 10 denigrate an individual by reason of his or her colour, race, ethnic or national origins, religion, gender, sexual orientation or disability.

9. Signed by the Leadership Team:

David Clapperton
Chief Executive



Date: 12/02/2021

Nicki Brady
Deputy Chief Executive



Date: 2/02/2021

Lisa Slade
Group Manager People and Culture



Date: 1/02/2021

Kevin Peel
Group Manager Infrastructure Operations



Date: 2/02/2021

Brent Maguire
Group Manager Infrastructure Development



Date: 12/02/2021

David McCorkindale
Group Manager Customer and Strategy



Date: 4/02/2021

