

#2.4.3

**CITY OF BOTHELL
ADMINISTRATIVE ORDERS**

TITLE: Electronic Communications Management & Use

EFFECTIVE DATE: August 1, 2020

REPLACES ORDER: 2.4.3 of June 1, 2018

APPROVED BY: 
Jennifer Phillips (Aug 9, 2020 12:31 PDT)

Name: Jennifer Phillips
Title: City Manager

1.0 PURPOSE:

To ensure effective and consistent management of the City of Bothell’s (hereinafter, the “City”) electronic communications, maintain compliance with applicable laws and standards, protect the City from liability, protect the integrity, availability and destruction of email, and to assure the City realizes an effective return on its technology investments.

2.0 DEPARTMENTS/DIVISIONS AFFECTED:

All.

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City of Bothell Information Services Electronic Communications Management & Use

FORWARD

This administrative order applies to all users of any City of Bothell Email System, Chat System or Messaging tool for the purpose of doing City business including but not limited to, employees, contractors, service providers, volunteers or any other person provided with a City email account.

This administrative order is necessary to ensure effective and consistent management of the City electronic communications, maintain compliance with applicable laws and standards, protect the City from liability, protect the integrity, availability and destruction of email, and to assure the City realizes an effective return on its technology investments.

The Electronic Communications Management & Use Administrative Order represents the combined efforts of the City Information Services Division (IS), Human Resources Department (HR), Legal Department and City Clerk. This Administrative Order is developed in conjunction with City Personnel Policies.

ELECTRONIC COMMUNICATIONS MANAGEMENT & USE ADMINISTRATIVE ORDER

PURPOSE AND SCOPE

1.1 Adoption, Purpose and Scope

1. **PURPOSE:** To establish the authority for the adoption of the Electronic Communications Management & Use Administrative Order.
2. **ORGANIZATIONS AFFECTED:** All units of City government; branches, departments and divisions.
3. **REFERENCE:** Not applicable
4. **ORDER:**
The Electronic Communications Management & Use Administrative Order is adopted by the City of Bothell City Manager. The City may, at any time, make changes to this administrative order.

In the event that the Information Services Division determines that changes to this Administrative Order are appropriate, the Assistant City Manager will so advise the City Manager and present proposed revisions for consideration and adoption.

Review and Ammendments. Review of this administrative order will be performed annually by Information Services. Upon review and with input from Legal, Human Resources, and City Clerk, recommended changes are submitted to the City Manager for approval.

ELECTRONIC COMMUNICATIONS MANAGEMENT & USE ADMINISTRATIVE ORDER

PURPOSE AND SCOPE

1.2 Definition of Terms

1. **PURPOSE:** To establish generally-accepted words and phrases used in the Email System Management & Use order.
2. **ORGANIZATIONS AFFECTED:** All departments/divisions.
3. **REFERENCE:** Not applicable.
4. **DEFINITIONS:**

Archiving: The act of preserving email outside of the City email system.

Compliance System: A system that makes searchable, email messages until such a time that they are to be deleted by individual users.

Compliance Officer: An email user with special privileges that gives them the ability to search and review emails stored in the compliance system for the purpose of *records management including disclosure resulting from public records requests, litigation, or general records retention*

Electronic Chat And Chat Messaging (s): Electronic communications sent or received using a chat message application, virtual meeting system or native phone texting tool.

Email Business Process Team: A team comprised of staff from Legal, City Clerk, and Human Resources who work with Information Services to maintain an email system that best meets legal retention requirements, while facilitating ease of use and effective records disclosure. The team makes email configuration and policy recommendations for City Manager approval.

Email System: The system used to send and receive City email, any application or tool used to access the system, and all data stored in or sent via the system.

Employee: Any person employed by the City of Bothell, including those employed on a limited or part time basis.

Integrity: The accuracy, completeness and validity of information.

Retain: The act of preserving email within the email system for the purposes of meeting retention and disclosure laws.

Retained Email: Email messages that are not deleted by users in their individual mailboxes or shared mailboxes which they manage.

Sensitive Data: Sensitive data includes but is not limited to passwords, Social Security numbers, credit card information, criminal justice information, protected health information (PHI), protected employee information, personally identifiable information (PII), bank account numbers, tax ID numbers or other information that is required to be exempted from disclosure under applicable laws and mandates.

Text Messages: Any electronic communication made or received via a mobile device's native texting or SMS tool.

User: Anyone who accesses City information systems, email, data or network resources.

ELECTRONIC COMMUNICATIONS MANAGEMENT & USE ADMINISTRATIVE ORDER

PURPOSE AND SCOPE

1.3 User Understanding

1. **PURPOSE:** To ensure all users of any City electronic communications system understand User Responsibilities within this administrative order.
2. **ORGANIZATIONS AFFECTED:** All units of City government, including branches, departments and divisions.
3. **REFERENCE:** Not applicable.
4. **ORDER:** All employees or electronic communication system users are expected to read and comply with all provisions of this Administrative Order.

ELECTRONIC COMMUNICATIONS MANAGEMENT & USE ADMINISTRATIVE ORDER
COMPLIANCE

2.1 Retention And Disclosure Strategy

1. **PURPOSE:** To establish procedures to ensure that all electronic communications, email mailboxes and archiving system are configured to support the City's ability to retain and disclose email as required by law.
2. **ORGANIZATIONS_AFFECTED:** All units of City government, including branches, departments and divisions.
3. **REFERENCE:** RCW 40.14.070.
4. **ORDER:**

Email Retention

City email is not automatically retained systemwide. Mailboxes are individually managed by each system user. Email deleted from individual mailboxes is deleted from the email system. Email boxes for employees designated as Executive Leaders must be configured to retain all email under a legal hold until such time the State Records Official deems they can be destroyed.

Email Auto Deletion

Individual Users have the ability to tag email folders for automatic deletion to facilitate appropriate record destruction.

Legal Hold on Elected Officials Mailboxes

Email boxes for City elected officials and boards/commission members must be configured to retain all email under a legal hold until such time the State Records Official deems they can be destroyed.

Retention of Email Boxes After Employee Separation

A Standard Operating Procedures will be developed by the Email Business Process Team that defines how long each email box must be retained after an employee separates from the organization or after any user account is no longer active. The length of time an email box is to be retained will be determined based on the type of position as compared against factors such as common records type associated with the position and employee record retention period.

Shared Mailboxes

Shared mailboxes should be configured to route email to staff. Shared mailboxes cannot be searched in a centralized compliance search system. If shared mailboxes are included in a public records request and are not configured to simply route mail directly to internal staff,

it is the responsibility of the individual users to search shared mailboxes for messages releavent to a disclosure request.

Electronic Communications Compliance and Disclosure

All messages existing in a City email or Chat tool, at any given time, are to be searchable from a centralized compliance system.

Departmental Compliance Officers are designated by the appropriate Department Director. Retained communications may be searched by each department's Compliance Officers.

Compliance Officers in the City Clerk's Office, Human Resources, and Legal have the authority to search all city mailboxes and chat messages for the purposes of records disclosure or litigation.

Compliance Officers may also be granted authority to perform compliance searches for the purposes of transferring records, that have met retention, to the Washington State Archivist.

Electronic Communication searches for any purpose other than records disclosure or litigation must be coordinated through Human Resources.

Designated compliance officers are permitted to create archives or export email and chat messages for the sole purpose of records request fulfillment or litigation.

Email or chat tool users should not have the expectation that their communications are private nor that their messages may not be disclosed.

Chat Message Rentetion

Chat messages, sent and received via an approved chat system, are retained for 7 days.

Online Meeting Chat Messages Retention

The city does not currently have the ability to retain chat messages or comments made in any online meeting tool.

Phone Text Message Retention

The City does not currently have the ability to retain or readily disclose text messages.

ELECTRONIC COMMUNICATIONS MANAGEMENT & USE ADMINISTRATIVE ORDER
ELECTRONIC COMMUNICATION TOOLS USE

3.1 Authorization & Access

1. **PURPOSE:** To establish procedures to manage user access to an City electronic communication system and to effectively manage licensing limitations.
2. **ORGANIZATIONS AFFECTED:** All units of City government, including branches, departments and divisions.

3. **REFERENCE:**

City of Bothell Personnel Policies and Procedures (10.5),
PCI Security Standards Council DSS Requirements - Section 4 & 7,
Department of Justice CJIS Security Policy - Section 5.6,
Information Security Administrative Order 2.4.1,
RCW 40.14.070

4. **ORDER:**

Authorization

- A. Users must not attempt to gain access to communication data for which they have not been given proper authorization.
- B. City employees must not use passwords for a City electronic communication tool or email system that are also used for non-City accounts or personal business.
- C. Sharing passwords with any person outside of approved Information Services staff (for the sole purpose of technical support) is prohibited.
- D. Email and chat system accounts are permitted for full-time employees, part-time employees, council members and paid interns.

Accessing Email Outside of Working Hours

- A. Non-exempt employees accessing email outside of normal working hours or while using sick time, leave or vacation requires director approval. Accessing email without approval may be considered unauthorized overtime.

Accessing Email From a Non-City Computer

- A. Email users are prohibited from using any computer application that downloads email to the local computer. Only access from the email web portal is permitted.
- B. Creating any individual archive or copies of City email on a non-City computer is prohibited.

Accessing Electronic Communication Tools From Mobile Devices

- A. Access to email or chat tool from any mobile device requires authorization from Information Services. Director approval may also be required.
- B. Any city mobile device from which a user is accessing email is required to have a lock code applied to the device.
- C. Approved email or chat tool systems may be used on personal mobile devices using the vendors mobile app and with supervisor approval.

ELECTRONIC COMMUNICATIONS MANAGEMENT & USE ADMINISTRATIVE ORDER
ELECTRONIC COMMUNICATION TOOLS USE

3.2 User Responsibilities

1. **PURPOSE:** To establish procedures to ensure email is used in an appropriate manner that protects sensitive data and controls non-City related emails.
2. **ORGANIZATIONS_AFFECTED:** All units of City government, including branches, departments and divisions.
3. **REFERENCE:**
City of Bothell Personnel Policies and Procedures (10.5),
PCI Security Standards Council DSS Requirements - Section 4 & 7,
Information Security Administrative Order 2.4,
Department of Justice CJIS Security Policy – Section 5.10,
RCW 40.14.070

4. **ORDER:**

Authorized Tools. Users must take care to use only an City approved tool for business related email and chat messages. Contact Information Services for a list of approved tools.

Email Retention and Disclosure. Users must take care to not delete email messages that have retention value. It is the user's responsibility to retain email that has disclosure value or must otherwise be retained as per Washington State retention laws. If a user deletes email of this kind, it cannot be recovered by Information Services.

Emailing or Messaging Sensitive Information

Sensitive information is not permitted to be transmitted via email, chat, or text.

Email or Chat for Personal Business

City email or chat tools should not be used for personal business. Using a City email address as a login email or for non-City business is prohibited.

Personal Archiving or Exporting of Electronic Communications. Personal archiving or separate storage of email, chat messages or texts is prohibited.

Emails Messages to All

Emails to the 'All' distribution group should 1) be related to City business only, 2) of a timely nature, and 3) affecting the majority of staff.

Naming Convention. It is the users responsibility to follow any email folder naming conventions or subject lines standards if such standards have been established by their department.

Auto Forwarding Email. Manually or automatically forwarding City related emails to a non-City email account is prohibited.

Profile Photos

Users shall upload an email profile photo, visible to all staff on the email system to help indicate the authenticity of the email and reduce impacts of phishing emails. Photos uploaded should be in alignment with City Personal Policies and code of ethics.

Email Message Texting Rules

Sending text alerts of new email messages to personal or any other non-City device is prohibited. Sending text alerts of new email messages to City mobile devices requires the approval of Information Services.