

Sacramento Suburban Water District

## **Electronic Communications System Management and Retention Policy**

Adopted: February 25, 2008  
Approved with changes: January 22, 2024

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### **100.00 Purpose**

The Sacramento Suburban Water District (District) provides electronic communications services and devices, including e-mail, desk telephoned, and mobile telephones (“electronic communications system”) to facilitate its employees’ conduct of District business. In return for providing electronic communications system, the District expects the employees to manage and protect records resulting from their use of the electronic communications system such as e-mails, text or voice messages. This policy is adopted by the Board for the purposes of stating the responsibilities of all District employees concerning the creation, storage, retention, and destruction of records generated by the electronic communications system that are designated official District records.

The District electronic communications system is intended solely as a means of communicating District information. All District employees are forbidden from using the District electronic communications system for the storage and maintenance of District records. To ensure the District electronic communications system functions as intended, it is imperative that all District employees regularly delete electronic communications, including e-mails, text and voice messages, from the system as provided in this policy.

This policy supplements and is intended to be implemented in concert with the District’s Records Management Policy (PL – Adm 002, “Records Policy”). While not all electronic communications are designated District records, all electronic communications are subject to discovery and can be used as electronic evidence in the event of litigation. Unmanaged and unidentified electronic communications residing on District systems and devices could create expensive and unmanageable problems in the event of litigation and pose a threat to the District’s ability to properly and coherently document and reconstruct business and allow decision-making processes.

The Board makes the following findings concerning specific features of the District’s computer network and related hardware and software that comprise the District electronic communications system:

1. District performs an electronic back-up of its computer network, including the e-mail system, on a regular schedule. The District does not backup

District cell/desk phone data. Those back-ups are an electronic recording of the status of the District's computer systems at a particular moment in time and cannot accurately capture or reflect all electronic communications or other activity that occurred on the District's computer network on a specific day. For example, a back-up does not capture items on employees' desktops or in their non-networked drives.

2. District maintains a particular computer system back-up for a set period of time, after which that back-up is completely over-written. Such overwriting is necessary for management and security reasons and to aid the recovery of the computer system in case of a complete failure. Because the process is transitory, a back-up is not reliable and cannot constitute official District records.
3. District maintains an e-mail filter which reduces SPAM, Phishing, viruses, and other unwanted e-mail and malware from entering the District's system. Employees of the District are responsible for reviewing summary e-mail lists from the e-mail filter to determine if valid e-mails were captured by the filter. The e-mail filter system automatically deletes filtered e-mail after a certain time period.
4. District has implemented an electronic Records Management System (RMS) which serves as the repository of all District records for future storage and retrieval, retention control, and document protection. The RMS will be used to notify District employees of all records that have met retention policy requirements and are available for deletion from the system.

## **100.10 Scope**

Electronic communications generally are considered public records and therefore, the retention and disposition of public records is governed by the District's Records Policy. In general, electronic communications fall into three categories:

1. Communications that document official District business, which include without limitation, approvals for staff action initiating a business transaction, requests and replies to a request for public information, and direction to employees or consultants. Such communications generally should be transferred to the RMS and retained in accordance with the District's Records Policy.
2. Communications that provide transitory information, such as announcing the date and time of a meeting, responses to professional organizations in which an employee participates, external colleague communications, and for other general information about the District. Such communications are transitory and are not considered District records that must be managed according to the District's Records Policy and shall be routinely deleted from District electronic communications system. If a District employee believes that any communication of this type constitutes a District official record, such e-mails

or e-mail attachments, text messages or voice messages should be transferred to the RMS and retained in accordance with the District's Records Policy.

3. Electronic documents such as personal e-mail or text correspondence, informal e-mail, text or voice communications between District employees, and working notes and drafts (unless intentionally saved for an official purpose). Such documents are not District records and should be permanently deleted from the District's electronic communications system, including servers, workstations, laptops, cell/desk phones, etc., as soon as they are received and read, or are otherwise superseded or subject to deletion under this policy.

## **200.00 Policy**

It is the Policy of the District that any electronic communication containing information that documents District business must be saved into the RMS in accordance with the District's Records Policy. Responsibility for complying with this policy is imposed on each District employee. If an employee has any question or concern about retaining an electronic communication or attachment or other issues of compliance with this policy, he or she should discuss the issue with the General Manager or his/her designee. If deemed necessary, the General Manager or designee may consult with legal counsel about any electronic communication retention or removal issue.

### **200.10 Text or Instant Messages**

It is the policy of the District that employees may use text or instant messaging only for routine or transitory messages that do not need to be retained by the District. Examples include informal notices of meetings, directions, scheduling information, and other routine messages that would not be kept in a file if it were a paper communication.

### **200.20 Violation of Policy**

While the Board recognizes that occasional lapses in the use and management of electronic communications occur in the process of business, a failure to adhere to this policy also could have serious legal and financial consequences for the District. Therefore, violations of this policy will be reviewed on a case-by-case basis. In appropriate cases, as determined by the General Manager, a violation may result in disciplinary action against an employee, up to and including termination.

### **200.30 Procedures**

The General Manager will prepare procedures outlining implementation protocols for this policy.

**300.00 Policy Review**

This Policy shall be periodically reviewed by the Board of Directors in accordance with its established policy review schedule.