Corporate Retention Policy for Council of Europe Emails

I. Introduction

The retention policy defines how long information is kept until it is deleted/destroyed or when and how it is archived.

The decision on the retention period is driven by:

- Internal, fiscal and legal regulations
- Content and context of the information

The author of the information and the organisational archivist usually make decisions on retention if there is no applicable regulation. This is formalised in the Retention and Disposal Schedules of particular entities. All major entities must have their own retention and disposal schedules, which rule the destruction of information produced in the course of the Coe activities (including e-mail).

Technical constraints and long term preservation issues require also a corporate policy for retention of e-mail stored on e-mail tool, which is the Exchange/Outlook.

The important email intended for sharing or evidence must be placed and managed into official repositories that provide correct support for complying with the COE and other legal and fiscal regulations applicable.

The current official repositories are Document and Records Management System(DM/RM) and the Public Folders(PF) structure for those who have not migrated yet to the new environment.
II. Purpose

In line with the requirement for improved efficiency and savings in administrative procedures, the Council of Europe defines its corporate policy for e-mail retention with the objective to:

- Ensure that the information important for the Council of Europe is available for those who have right and need it according the agreed retention and disposal schedules
- Reduce the storage costs
- Reduce the cost of e-discovery in case of lawsuits
- Reduce the risk of legal examination that focuses on exchanges and decisions in emails

III. Retention

E-mail retention on Exchange/Outlook is two years for personal mailboxes

Any email in the Echange/Outlook mailbox is retained for two, or exceptionally five years (based on justified demand of a directorate). This means any authors have two years for moving their e-mail to the appropriate official repository (DM/RM) for the purpose of sharing or evidence if applicable.

E-mail retention on Exchange/Outlook is five years for shared mailboxes

The content of shared mailbox of entity is retained for five years since creation date. Emails reaching the end of their life cycle will be deleted automatically. A reminder will be sent before deleting the items.

The mailboxes of the Secretary General and the Deputy Secretary General are retained permanently unless different instruction is given by the Secretary General.

IV. Rules for storing e-mail on a specific repository:

- Any mail shared with colleagues inside a respective entity should be shared on Exchange/Outlook
- Any important mail shared across the Council of Europe should be placed into DM/RM
- Any mail with a life expectancy of more than five years should be placed into RM
- Any email not transferred into DM/RM will be automatically deleted after two years for individual mailboxes and five years for shared mailboxes.
- Any email on legal hold should be placed into the Records system and kept until the hold is stopped and until it reaches the retention period indicated in the disposal schedule.
- Email for personal use, with limited importance will be managed in the mailbox of each staff. The mailboxes are supported by Exchange software.
V. Implementation:

Any new mailbox created from 1.1.2015 will have the new policy applied.

Details of processes and procedures form a document apart.