

Ashdown-Hoff, Melissa

Subject: FW: Email Security [OFFICIAL]

From: Ashdown-Hoff, Melissa
Sent: 18 November 2019 09:36
To:

Classification: OFFICIAL

Dear Colleagues,

To Bcc or not to Bcc that's that is the question?

Our email accounts contain a vast array of personal data, from the names and email addresses of colleagues and members of the public to attachments containing sensitive personal data and conversations regarding individuals behaviour or conduct, all of which will be covered by the General Data Protection Regulations. The quick nature of email communication is one of its main benefits; however it can pose Data Protection Risks as well.

It is important to take a proportionate approach to some GDPR issues and this is one of them. Whilst strictly speaking my email address and your email address is personal data, when working with colleagues across the public, private and third sectors it is not always necessary to Bcc in all recipients. CC'ing recipients into emails can enhance networking and collaboration between partners. Where colleagues have a recognised work email address such as .nhs, .gov or .pnn email address it will be easy to identify the address as a work one, however more caution may be needed when working with the private and third sector partners, especially in the third sector as individuals often use personal email accounts to work from. If you are in doubt pick up the phone and ask the individual if they are happy to have their email address shared with others or ensure that say everyone attending a meeting or part of a working group is informed that the email addresses of those attending will be shared.

When working with and emailing victims, offenders or members of the public much more caution is needed and this is where you will need to ensure that you use the BCC function. Last year the Independent Inquiry into Child Sexual Abuse was fined £200,000 following a data breach which involved the incorrect use of email. A member of staff sent a bcc email to 90 inquiry participants informing them about a public hearing. After noticing an error in the email he sent a correction email out, however in the correction email the individuals email addresses were entered into the to field, instead of the bcc field. This allowed the recipients to see each other's email addresses, identifying them as possible victims of child sexual abuse. 52 of the email addresses contained the full names of the participants or had a full name label attached. The nature of our work means we frequently come into contact with vulnerable individuals and it is important to remember to use the bcc field when emailing multiple recipients.

As always please do get in contact if you have any data protection or information governance queries as I am happy to assist.

Melissa Ashdown-Hoff
Information Governance Officer
Office of the Police and Crime Commissioner West Yorkshire
Int Ext: 27233

Tel: 01924 294033 or 07716 701706

Email: Melissa.Ashdown-Hoff@westyorkshire.pcc.pnn.gov.uk

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