

**TO: ALL COUNTY PERSONNEL**

**FROM: VERDENIA C. BAKER  
COUNTY ADMINISTRATOR**

**PREPARED BY: COUNTY ATTORNEY'S OFFICE**

**SUBJECT: THE USE, RETENTION, AND DESTRUCTION OF  
ELECTRONIC MAIL (E-MAIL)**

**PPM#: CW-R-006**

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**ISSUE DATE**  
**April 9, 2025**

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**EFFECTIVE DATE**  
**April 9, 2025**

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**PURPOSE:**

To provide guidelines and policy on the use, retention, and destruction of electronic mail (e-mail), and to apprise County employees of potential disciplinary actions for violations of this policy.

**UPDATES:**

Future updates to this PPM are the responsibility of the County Attorney's Office.

**AUTHORITY:**

- Florida Constitution, Art. I, Sec. 24(a), as may be amended
- Florida Statutes (F.S.), Ch. 119, as may be amended
- Florida Administrative Code, Ch. 1B-24.003, as may be amended
- Florida Administrative Code, Ch. 1-B-26.003, as may be amended
- State of Florida Electronic Records: Records Management Practices, as may be amended
- State of Florida General Records Schedule GS1 -SL- State and Local Government Records, as may be amended
- PPM # CW-R-005, as may be amended

**POLICY:**

It is the policy of Palm Beach County that:

- a) Computer systems and software either purchased, leased, or rented by Palm Beach County are the sole property of Palm Beach County and are intended for official County business purposes. Limited personal use of such property for e-mail purposes is acceptable during personal time in accordance with individual departmental policies (whether written or not). E-mail shall not be used for the conduct of private business activity or in any other manner,

which reflects unfavorably on the County, its employees, its citizens, or in a manner unbecoming of a County employee. Global messages of a personal nature and chain letters are strictly prohibited.

- b) If signature blocks for County e-mails are used, they should be uniform and fashioned in accordance with the guidelines and sample below. Employees should refrain from using extraneous language. The use of photos is prohibited.

[First Name Last Name]  
[Position Title]  
[Address]  
[Phone Number]  
[Fax Number]  
[Email Address]

Employees may include professional certifications relevant to their position in their e-mail signature blocks.

- c) All e-mail messages made or received pursuant to law or ordinance or in connection with the transaction of official business transmitted through County property shall be considered public records unless otherwise exempted by law. Employees should not have an expectation of privacy. Palm Beach County reserves the right to access and disclose the contents of employee e-mail messages sent over its electronic mail system at least under the following circumstances:
- Routine system maintenance.
  - General inspection, or monitoring, with or without notice.
  - Specific review of the individual files or monitoring of individual activity, with or without notice.
  - In the event of a public records request.
- d) Transmission of inappropriate messages such as those which include racial, religious or gender epithets, obscene materials, or materials for the personal benefit of individuals, are strictly prohibited. Employees violating this policy are subject to serious disciplinary action, including possible termination.
- e) When a public records request is submitted to Palm Beach County, all e-mails must be reviewed for exempt information prior to its release, and all exempt information must be redacted prior to disclosure, in accordance with F.S., Chapter 119 (Florida Public Records Act).

Examples of exemptions include, but are not limited to, the following:

- Attorney-client privileged messages/documents, or attorney work-product documents. (Communications to or from the County Attorney's office, or outside counsel, regarding a pending lawsuit.)
- Social security numbers received by the County, including, but not limited to the social security numbers of all current or former County employees.
- Examination questions, or answers of examination questions, administered for County employment purposes.
- Medical information pertaining to a County employee or dependent of a County employee.

When in doubt about whether information is exempt from public disclosure, please contact the Record Management Liaison Officer in the Office of Financial Management and Budget or the County Attorney's Office.

**RETENTION POLICY:**

Palm Beach County will treat e-mail messages just like any other public record, and shall retain them in a manner so they are accessible to the public. Retention schedules are based on a record's informational content, not its method of creation, transmission, or storage. E-mail that is a transitory message shall be retained until obsolete, superseded, or the administrative value is lost.

**TRANSITORY MESSAGES (GS1-SL Item #146):**

Transitory messages are created primarily for the communication of information, and not for the perpetuation of knowledge. They do not set policy, establish guidelines or procedures, certify a transaction, or become a receipt. They are informal, and might be compared to the communication that might take place during a telephone conversation or conversation in an office hallway. Other examples include routine announcements and information; general information used in daily function of the administrative area; and meeting notices.

**NOTE:** If the document or record's content falls outside of a transitory message contact the Records Management Liaison Officer for the appropriate retention schedule.

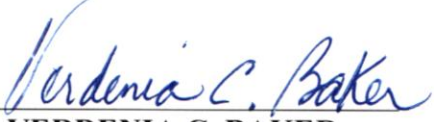
Each originator of an e-mail document is responsible for maintaining a copy of the document or record, as required, by its appropriate retention schedule. If the record's content is other than a transitory or personal message then the copy of the record must be stored on paper, hard drive, or other media. System back up copies are also public records, but they fall under the record series titled, "Administrative Convenience" and are to be "retained until obsolete" and are purged after 90 days, or according to tape rotation schedules.

**DESTRUCTION POLICY:**

Personal messages, and transitory messages that no longer have administrative value, are obsolete or superceded shall be deleted in a timely manner. The Florida Department of State allows for the disposal of such records as soon as they are received, otherwise, they can accumulate in the e-mail system and consume disk space and erode the efficiency of the system. Each department, division or section's Records Management Coordinator, or Records Custodian, must prepare in advance an annual destruction request for transitory messages in accordance with County records management policy.

All County employees must follow the appropriate public records retention schedules for all other records, which is set forth in the State's General Records Schedules by particular subject matter. Any e-mail that must be retained for a period in excess of 10 years should be printed and retained in the file.

Contact the Records Management Liaison Officer for further information.

  
**VERDENIA C. BAKER**  
**COUNTY ADMINISTRATOR**

**Supersession History:**

1. PPM # CW-R-006, effective 10/28/1997
2. PPM # CW-R-006, effective 08/15/2007
3. PPM # CW-R-006, effective 11/21/2007
4. PPM # CW-R-006, effective 10/02/2012