

The Highland Council – Resources Committee
Policy for the Use of Customer Email Addresses

26th August 2015

Agenda Item	10(b)
Report No	RES/63/15

Report by Depute Chief Executive and Director of Corporate Development

Summary

This paper proposes a policy for the Use of Customer Email Addresses, supporting the collection and use of email addresses in line with data protection legislation.

1. Background

- 1.1 The Council is currently and increasingly gathering email addresses from customers. This allows the council to respond to online requests and enquiries in email form, saving time and money and meeting customer expectations. With current procedures, legislation prevents us from using these email addresses for other purposes e.g. promoting other online services, without the permission of the customer involved.
- 1.2 Saving email addresses in a way that allows them to be used for other purposes will increase the potential to communicate with customers in a medium that is cost effective, direct and immediate. It will allow the communication of more regular messages directly to customers on topics such as local events, the launch of new online services and proactive updates on council services. Customers will always have the opportunity to indicate that they do not wish to receive such emails, bringing our procedures in line with data protection legislation.
- 1.3 **Annex 1** sets out a policy that, if approved, will drive the collection of email addresses in a way that allows the council to use them to promote the Council and its services.
- 1.4 ***Members are asked to approve the policy for the Use of Customer Email Addresses.***

2 Legal Implications

- 2.1 There are potential legal implications surrounding the storage and use of personal details, including email addresses. Use of email addresses without the customer's permission is a breach of Data Protection Act and Privacy and Electronic Communications Regulations.
- 2.2 Implementing this policy provides the Council with a way of collecting and using email addresses in line with the above legislation.

3 Risks and resource implications

- 3.1 There are no current or anticipated risks or resource implications

4 Equalities, Gaelic and Rural Implications

- 4.1 There are no current or anticipated equalities, Gaelic or rural implications

5 Climate Change / Carbon Clever Implications

5.1 There are no current or anticipated climate change / carbon clever implications

6 Recommendations

6.1 ***Members are asked to approve the policy for the Use of Customer Email Addresses.***

Designation: Michelle Morris, Depute Chief Executive and Director of Corporate Development

Date: 17 August 2015

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Annex 1:

Policy for the Use of Customer Email Addresses and SMS numbers

The use of emails and text messages is becoming more prevalent, particularly with the development of more online services. Emails and text messages offer staff the ability to interact with customers quickly and efficiently and provide customers with information on devices and at times that suit them. This document presents the Highland Council policy on how to use email addresses and SMS numbers, and how to manage these personal details. This policy relates only to the use of customer email addresses.

Medium	Usage
Email address	Response to email received Response to request for service received via online forms. Marketing purposes (dependant on customer permissions granted).
SMS numbers	Informative only - use of SMS for marketing purposes is still under development. Reminder of appointments (tenant meetings, bulky uplifts etc) Notification of attendance (housing repairs etc)

Collection

Email addresses and mobile phone numbers can be collected for specific purposes or during general customer engagement. They may be obtained through a customer email enquiry, online form, myaccount registration or on request face to face or on the telephone.

In order to allow email addresses to be used to promote council services and processes, customers must be given the ability to opt in or opt out i.e. to indicate whether they are happy to receive promotional emails.

Customers must be given the opportunity to:

- Opt out of receiving promotional emails
- Change their choice at any time
- Unsubscribe each time they receive a promotional email
- Review and update their email address

These opportunities should be available through all customer contact channels: Face to face, telephone and online.

To implement this approach, the following functionality will be required:

- Development of CRM to provide a place to store marketing preferences, updatable manually and automatically through online forms.

- Include a tick box on all online forms that require an email address, to enable customers to opt in or out.
- Include a script for telephone and face to face transactions to support the collection, opt in /out and review of email addresses.

Storage

Lagan CRM is now the corporate repository for email addresses and SMS numbers. When contacting customers via email or SMS, the details should be obtained from CRM. Where these details are required to be available in other systems, a link should be developed to update these details automatically from CRM.

Myaccount provides customers with the opportunity to update their personal details, including email addresses, and a method for using this information to keep CRM updated is being developed.

Use

Email should be used to communicate with customers who have initiated the contact via email or online forms. Email can also be used for customers who have indicated that this is their preferred method of communication. Email addresses must be taken from Lagan CRM.

SMS text messages should not be used for general communication or interactions with customers that will require a response. They should be used to notify customers of appointments, notification of timings for home visits and reminders of expiry dates of licences or applications.

Promotional emails

Promotional emails can be sent to customers who have provided their express permission for their details to be used in this way. The ability for customers to opt in to receiving promotional emails must be coupled with the development of an approach to marketing, ensuring that emails are co-ordinated and appropriate for the audience.

When you send an electronic marketing message, you must tell the recipient who you are and provide a valid contact address. You must make it easy to opt out or unsubscribe.

Policy Owner: Vicki Nairn (Head of Digital Transformation)