

Columbia County School System employees generate, receive, and store documents and records of a confidential nature. To prevent the danger of individuals' confidential information being obtained and misused for illicit purposes, such as identity theft and fraud, and wrongful access to facilities, materials, and information, confidential documents and records shall be securely maintained and destroyed in accordance with applicable retention schedules. Likewise, employees shall limit personal information collected, produced, and maintained only to that which is necessary for the safe, efficient operation of the school and school system.

For the protection of all members of the school system community, to include students, faculty, and staff, and for the protection of the school system, Policy GBU (2)/CB (2) and this procedure are hereby enacted immediately, and are applicable to all school system employees.

A. DEFINITIONS

Confidential documents and records include, but are not limited to, the following items:

- **Documents containing a social security number**
- **Documents containing an employee or student ID number**
- **Academic information regarding students identified by name or social security number, including but not limited to graded papers, transcripts, class rosters, and disciplinary records**
- **Medical records**
- **Personnel records**
- **Passwords and UserID information for operating systems and software applications**
- **Information that, if disclosed, would harm an individual by embarrassment, loss of reputation, or loss of employment**
- **Any information considered confidential in accordance with the provisions of the Federal Educational Right to Privacy Act**

Confidential Records Coordinator

It is required that each school and department have a Confidential Records Coordinator. The Confidential Records Coordinator shall have the responsibility

for overseeing the collection, storage, and destruction of confidential documents and records.

The records official shall ensure that records are properly maintained in a locked, secure location where they cannot be inappropriately read, copied, stolen, or changed and that building access controls are in place.

Internal Access and Use

Restrictions

Access to confidential information should be restricted to those with legitimate professional interest. School principals and heads of departments shall have authority for specifying the need for and approval of access to such information.

Documents containing faculty and staff personal information, such as directories and calling trees, should be treated as confidential unless all listed parties consent to the publication and distribution of the information.

Visitors

Visitor or other third-party access to school system offices, work areas, or computers containing sensitive information must be controlled by staff members, insuring physical security of confidential information.

Software Applications, Operating Systems, Portable Computers

Access to confidential information by way of software applications and operating systems shall be password and/or user id protected. Users are responsible for the security of their passwords and are not to allow others to access information under their sign-on. As soon as practicable, users should change default vendor passwords to a password that follows the suggested guidelines provided by the Technology Department.

Users of portable computers such as notebooks and tablets, personal digital assistants, and similar devices should limit the storage of confidential information to that which is reasonably required for the performance of duties. Said users are responsible for the protection of stored confidential information and should delete information as its necessity is terminated.

External Release of Confidential Information

The Executive Director of Human Resources shall serve as the Columbia County School System Records Official and is responsible for keeping unrestricted records accessible to the public and confidential information private. All requests for information and official open records requests should be referred to the records official.

Except as otherwise provided by law or court order, all records prepared and maintained or received in the course of the operation of the school system shall be open to the public in accordance with the Georgia Open Records Act, O.C.G.A. § 50–18–70 et seq.

Pursuant to this act, a reasonable charge will be collected for search, retrieval, and other direct administrative costs for complying with a request to inspect or copy records. When copies are requested, a copying fee will be charged and collected in accordance with O.C.G.A. § 50–18–71.

In addition to the Georgia Open Records Act, the records official shall be familiar with other federal and state statutes, including the state’s Freedom of Information Act and Privacy Act, and has discretionary power to release or not to release information that is neither required nor exempted from release by such laws. This official shall keep an accurate accounting of the date, nature, and purpose of all disclosures of records to individuals or other agencies, along with the name and address of the person or agency to which the disclosure was made.

Records Destruction

The destruction of specified school system records shall be authorized by the principal or head of the department in accordance with the record retention schedule and state law.

Confidential destruction performed by approved commercial or non-profit vendors shall be subject to such contractual obligations as required by the Columbia County School System Controller. In no case shall such contractual arrangements introduce standards, policy, or procedures less protective of confidential records than those rules which are described in these guidelines and which apply to all school system officers and staff.

A destruction record describing and documenting records, in all formats, authorized for destruction, as well as the date, agent, and method of destruction shall be maintained in the office of origin and at the warehouse. The destruction record itself shall not contain confidential information. The destruction record may be retained in paper, electronic, or other formats.

Safe and Secure Disposal

Confidential records destruction will be arranged and directed by the Assistant Superintendent of Student Support. Records that have passed through the active phase of their life cycle and are no longer needed for the day-to-day operation of their office of origin should be identified by office staff and placed on the records retention schedule. When those records have

reached the conclusion of their retention period, the office of origin will authorize their destruction.

Paper records containing confidential information should be shredded and never thrown out with other forms of wastepaper or miscellaneous trash.

Electronic or machine-readable records containing confidential information should be deleted from digital files and the desktop “recycle bin” emptied when said information is no longer needed. To prevent the reconstruction of any data formerly stored on a hard drive, the hard drive should be permanently erased by a technology support specialist. Disks, back-up tapes, film, audio and videotapes should be physically destroyed.

Confidential Information Awareness

Each school principal and department director will ensure that all employees have read and understand Policy GBU (2)/CB (2) and this procedure. A signed letter of acknowledgement for each employee shall be maintained by the principal or department director.

ADOPTED: November 14, 2006

REVISED: 7/10/07

Columbia County Board of Education

Confidential Information Letter of Acknowledgment

It is the professional duty of each school system employee to protect the health, safety, and general welfare of students, their families, and staff and to ensure the citizens of Georgia a degree of accountability within the school system. In the fulfillment of this duty and in keeping with Standard 7: Confidential Information, the Board of Education has a responsibility to the citizens to safeguard the confidentiality and integrity of the information that it collects and maintains.

During the course of your employment with the Columbia County School System, you may have access to confidential information regarding students and/or employees, hereinafter referred to as “Confidential Information.” Confidential Information, written or oral, includes, but is not limited to, student and employee records, files, documents, and any sensitive material relating directly to an individual.

In order to protect data defined as Confidential Information, you must (a) access data only for the purpose(s) for which it was obtained, and (b) limit access to such Confidential Information to those who have a need to know. As a general rule, portable Confidential Information should not be taken from the workplace. On those occasions where it is necessary to take documents, information on electronic storage devices, or a portable computer containing Confidential Information off-site, all appropriate precautionary and security measures shall be taken to protect the information.

During the course of your employment with the Columbia County School System, you may be provided and/or will generate correspondence such as memoranda, reports, summaries, student/employee lists, and other documents. Any and all such records and data, whether maintained in hard copy, on a computer disk, computer hard drive, computer tape, or other medium is the property of the Columbia County School System and, as such, shall not be accessed or removed upon separation of your employment with the school system, nor shall you retain any copy or notes of said information.

Failure to comply with Policy and Procedure GBU (2)/CB (2) will result in disciplinary action up to and including immediate termination.

I acknowledge receipt and understand and will abide by the expectations of Policy and Procedure GBU (2)/CB (2).

Employee Name (print): _____

Employee Signature: _____

Date: _____