

## **Personal Information Systems Policy**

The School shall operate and maintain a Personal Information System (the “System”) in accordance with Ohio Revised Code Chapter 1347. The School shall collect and maintain only personal information that is necessary and relevant to the functions that the School is required or authorized by statute, ordinance, code, or rule, and eliminate personal information for the System when it is no longer necessary and relevant to those functions.

The School superintendent is responsible for the System and shall implement procedures to protect information in the System from unauthorized modification, destruction, use, or disclosure. Personal information in the System shall be monitored and maintained by school personnel for accuracy, relevance, timeliness, and completeness to assure fairness in any determination made with respect to a person on the bases of the information.

The System shall not be interconnected or combined with another local agency unless the interconnected or combined system will contribute to the efficiency of the School in the implementation of its programs. The information contained in the system must be necessary and relevant to the School’s purpose.

If there is a reasonable belief that unauthorized access to the System could result in identity theft or fraud, the School shall expediently inform all persons whose personal information is subject to a security breach.

Every person who has any responsibility for the operation or maintenance of the System or for the use of personal information maintained in the System, shall be informed of the provisions of Ohio Revised Code Chapter 1347 and this policy and shall conduct themselves in accordance.

Any person who initiates or otherwise contributes to any disciplinary or other punitive action against any individual who brings to the attention of appropriate authorities, the press, or any member of the public, evidence of unauthorized use of information contained in the System shall be subject to appropriate disciplinary measures which may include termination of employment.

Upon request by and proper identification of any person who is the subject of personal information in the system, the School shall:

- Inform the person of the existence of personal information in the system of which the person is subject.
- Allow the inspection of the personal information in the system.
- Inform the person of the types and uses of the personal information, including the identity of users usually granted access to the system.
- Disclose medical, psychiatric, or psychological information to a person who is the subject of the information, unless a physician, psychiatrist, or psychologist determines for the School that the disclosure will have an adverse effect on the

person. In such cases, the information shall be released to a physician, psychiatrist or psychologist who is designated by the person or the person's legal guardian.

- Provide copies of the information upon request by a person authorized to inspect the information.

A person may dispute the accuracy, relevance, timeliness or completeness of personal information by submitting a written request to the School. Upon the receipt of such a request, the School shall within a reasonable time, but not later than ninety days, make a reasonable investigation to determine whether the disputed information is accurate, relevant, timely, and complete. The School shall notify the person of the results of the investigation and the action the School intends to take with respect to the information. The School shall delete any information that it cannot verify or that it finds to be inaccurate.

If the person is not satisfied with the School's determination, the School shall either:

- (a) Permit the disputant to include within the system a brief statement of his/her position on the disputed information. The School may limit the statement to not more than one hundred words if the School assists the disputant to write a clear summary of the dispute.
- (b) Permit the disputant to include within the system a notation that the disputant protests that the information is inaccurate, irrelevant, outdated, or incomplete. The School shall maintain a copy of the disputant's statement of the dispute. The School may limit the statement to not more than one hundred words if the School assists the disputant to write a clear summary of the dispute.

The School shall include the statement or notation in any subsequent transfer, report, or dissemination of the disputed information and may include with the statement or notation of the disputant a statement by the School that it has reasonable grounds to believe that the dispute is frivolous or irrelevant, and of the reasons for its belief.