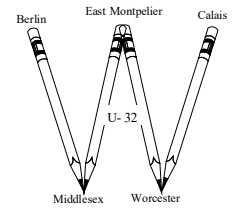


# Washington Central Unified Union School District

*WCUUSD exists to nurture and inspire in all students the passion, creativity and power to contribute to their local and global communities.*

1130 Gallison Hill Road  
Montpelier, VT 05602  
Phone (802) 229-0553  
Fax (802) 229-2761

Bryan Olkowski.  
Superintendent



## WCUUSD Policy Committee Meeting Agenda 1.26.21 4:30-6:30 pm

Via Video Conference\*

<https://tinyurl.com/y2azcgy9>

Meeting ID: 846 4397 9021

Password: 461171

Dial by Your Location 1-929-205-6099

1. Call to Order
2. Approve Minutes of 1.12.21 – pg. 2
3. Review of Technology Policies
  - 3.1. F25 Access Control – pg. 5
  - 3.2. F40 Change Management – pg.7
  - 3.3. F41 Reasonable Care in Protecting Proprietary and/or Confidential Information – pg. 10
  - 3.4. F22 Data Retention and Storage – pg. 11
  - 3.5. F43 Backups – pg. 13
  - 3.6. D3 District Take Home Device & Personal Device Policy – pg. 15
  - 3.7. F44 Password Management Policy – pg. 18
  - 3.8. F45 Acceptable Use – pg. 21
  - 3.9. F47 Electronic Mail – pg. 24
  - 3.10. F48 Incident Response Policy and Plan – pg. 26
  - 3.11. B8 Electronic Communication Between Employees and Students – pg. 27
4. Future Agenda Items
  - 4.1. E46 Memorial Policy
  - 4.2. C13 Homeless Students
  - 4.3. School Choice
  - 4.4. School Closure
5. Adjourn

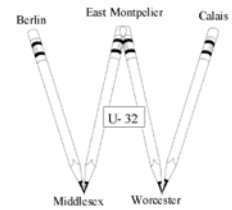
**\*Open Meeting Law temporary changes as of 3/30/20:** Boards are not required to designate a physical meeting location. Board members and staff are not required to be present at a designated meeting location. **Our building will not be open for meetings. All are welcome to attend virtually.**

# Washington Central Unified Union School District

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Bryan Olkowski  
Superintendent



## WCUUSD Policy Committee Meeting Minutes Unapproved 1.12.21 4:30-6:00 pm

**Present:** Superintendent Olkowski, Aaron Boynton, Michelle Ksepka, Chris McVeigh, Dorothy Naylor, Jaiel Pulskamp, Jim Garrity, Amy Molina

- 1. Call to Order:** Chris McVeigh called the meeting to order at 4:36 p.m.
- 2. Approve Minutes of 12.8.20:** Dorothy Naylor moved to approve the minutes of December 8, 2020. Seconded by Chris McVeigh, this motion carried unanimously.

### 3. Review of Technology Policies

Jim Garrity had provided a packet of draft technology policies for the committee to discuss. The following policies were reviewed:

- 3.1. WCUUSD Information Security Policy**
- 3.2. F25 Access Control**
- 3.3. F40 Change Management**
- 3.4. F41 Reasonable Care in Protecting Proprietary and/or Confidential Information**
- 3.5. F22 Data Retention and Storage**

Jim Garrity explained that “data” under this policy includes meeting minutes, electronic documents, video, etc. This policy was discussed, as the content related to use of personal cell phones or laptops is new. Amy Molina indicated that this will be a big change for staff, as they have been in the practice of using their own phones, for example, to access functions of infinite campus. Chris McVeigh asked, for example, when exceptions are made to the policy, who is the person who would make the exception? Jim Garrity stated that, traditionally it would be the IT Director and one other person. Chris McVeigh indicated that he would want a monthly reporting to the Superintendent, to make him aware of the exceptions that have been made. Superintendent Olkowski recommended “Superintendent or Superintendent’s Designee” for this topic. He hesitates to designate “IT Director” in the policy as the position is not necessarily mandatory.

The following language was discussed as a possibility: "Approval by Superintendent or Superintendent's designee to use personal devices to access district resources, and as exceptions are made to the policy, information will be shared on a regular basis with leadership team." Amy Molina asked - is Infinite Campus considered sensitive material? Is accessing Infinite Campus on a personal cell phone really accessing sensitive material? Some discussion followed about what warrants sensitive material. Michelle Ksepka indicated that teachers are limited as to what they can access on Infinite Campus. Jim Garrity would like to change the language to provide access to teachers as needed but to protect data. He stated that if staff needs to access information that is outside of the norm within the policy, they can go to their building administrator for access. He suggested that he and Michelle Ksepka work together on editing this policy. Policy committee members indicated that they approve of the gist of the policy as discussed, where teachers have limited access to student data but administrators have broader access.

### **3.6. F43 Backups**

Jim Garrity explained how staff are encouraged to save documents and files to the network drive as this provides backup. He explained that if/ when devices "crash," it is likely that they will lose what isn't backed up to the network drive. Chris McVeigh suggested that there be a waiver that if personal data is stored on work computer systems, then WCUUSD has no responsibility for maintaining that personal data. Amy Molina shared that employees have a user agreement; she wonders if there is already information in the user agreement that acknowledges this. Jim Garrity will review the existing user agreement. Some discussion followed around the terminology, e.g. "company."

### **3.7. D3 District Take Home Device & Personal Device Policy**

Jim Garrity reviewed this policy. Amy Molina stated that based on her experience, some of the policies that we are discussing tonight feel like they are more procedural and belong in a handbook rather than a policy. Superintendent Olkowski shared that at previous meetings we had discussed: what needs to be policy and what needs to be included in a user handbook as more procedure or best practice? Chris McVeigh stated that we should also carefully consider what policy we want in place, for long term, even beyond COVID19. Some discussion followed around the idea of one-to-one devices, especially in elementary and middle school. Aaron Boynton stated that, in elementary school, he does not see a universal need for one-to-one devices that go home with students - maybe more so in fifth/ sixth grade. He noted that the damage to machines is significant. Some discussion followed around the idea of "softening" language to "may" instead of "will." Chris McVeigh indicated that, for the last paragraph of this policy, we should be clear about the standard wherein we would confiscate and search a mobile device. We should be consistent across policies. The committee had discussed this topic in length when considering other policies related to search and seizure. Jim Garrity will take another stab at this part of the policy. Amy Molina indicated that this paragraph makes her very nervous as she understands this to mean personal cell phone or personal iPod.

Superintendent Olkowski clarified the process - will the committee continue to the next five policies or will the committee revisit the five for which we've discussed edits?

Chris McVeigh stated that he would like to revisit the five that we are currently working on, and get them to a place where we can bring to the board. He asked that revisions be noted in italics so that the committee will be able to see the changes. At the next meeting the committee will consider the revised policies.

**3.8. F44 Password Management Policy**

**3.9. F45 Acceptable Use**

**3.10. F47 Electronic Mail**

**3.11. F48 Incident Response Policy and Plan**

**3.12. B8 Electronic Communication between Employees and Students**

**4. Future Agenda Items:** Next meeting: January 26, 2021 4:30 - 6:30

**5. Adjourn:** The committee adjourned by consensus at 6:01 p.m.

Respectfully submitted,  
Lisa Stoudt, Committee Recording Secretary

## Recommend

WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT

Board of Directors' Policy

ACCESS CONTROL POLICY

POLICY: F25

WARNED: \_\_\_\_\_

ADOPTED: \_\_\_\_\_

EFFECTIVE: \_\_\_\_\_

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## Overview

This policy applies to Washington Central Unified Union faculty, staff, students, **outside organizations**, contractors and vendors that connect to servers, applications or network devices that contain or transmit WCUUSD Protected Data, per the Data Classification Policy. All servers, applications or network devices that contain, transmit or process WCUUSD Protected Data are considered “High Security Systems”. Additionally, All WCUUSD access is controlled by the use of keys at offices or proximity badge within parts of the building. The proximity badge is managed by IT. Access levels are defined by job requirements and management.

## Purpose

This policy is designed to protect WCUUSD from unauthorized access to facility and assets. Access controls are designed to minimize potential exposure to the District resulting from unauthorized use of resources and to preserve and protect the confidentiality, integrity and availability of the District’s networks, systems and applications.

## Policy

It is the policy of the Washington Central Unified Union School District (WCUUSD) to provide a safe environment for students and employees while facilitating access to school buildings, premises and equipment by authorized users. The safety and security of the district’s physical space and assets is a shared responsibility of all members of the Washington Central Unified Union School District. This policy addresses the design and management of access-control systems and measures to ensure consistency in implementation.

The District shall establish access control procedures to address the design, administration and management of access control systems and measures. Access-control privileges shall be determined and assigned by the Superintendent or designee based on the specific needs and requirements of the District and the electronic identification/access badge.

## Physical Security

For the purpose of this policy, physical security has been divided into two elements: site physical security and information asset physical security.

- **Individual Access-** Physical access to information assets is granted on a need-to- know basis to provide the minimum access to sensitive data necessary.
- **Responsibilities-** IT will be responsible for:
  - Developing, implementing, maintaining and enforcing information asset physical security policies.
  - Ensuring physical security policies and procedures are tested and reviewed **at least** annually.

- Results of testing and review shall be used to make changes to policies and procedures as needed.
- Documenting exceptions to policies and procedures and identifying compensating controls where exceptions are made.
- Tracking all facility modifications

## User Access

All users of District systems will abide by the following set of rules:

- Users with access to District Systems will utilize a separate unique account, different from their normal District account. This account will conform to the following standards:
  - The password will conform, at a minimum, to the published District Password Policy and Standards.
  - Inactive accounts will be disabled after 90 days of inactivity.
  - Access will be enabled only during the time period needed and disabled when not in use.
  - Access will be monitored when account is in use.
  - Repeated access attempts will be limited by locking out the user ID after not more than six attempts.
  - Lockout duration must be set to a minimum of 30 minutes or until an administrator enables the user ID.
  - If a session has been idle for more than 15 minutes, the user is required to re-authenticate to re-activate the terminal or session.
- Users will not login using generic, shared or service accounts.
- Service providers with remote access to customer premises (for example, for support of POS systems or servers) must use a unique authentication credential (such as a password/phrase) for each customer.

## Administrative Access

- Administrators will abide by the Privileged Access Policy.
- Users will abide by the above user access guidelines.
- Administrators will immediately revoke all of a user's access to High Security Systems when a change in employment status, job function, or responsibilities dictate the user no longer requires such access.
- All service accounts must be used by no more than one service, application, or system.
- Administrators must not extend a user group's permissions in such a way that it provides inappropriate access to any user in that group.

## Identification Badges

Each employee of the facility will be issued a Photo ID and access card (or key) during their new hire orientation and office employees will be given a key to the office. All employees are expected to wear the Photo ID card at all times when on site at any facility where WCUUSD assets are stored digitally. These cards are the responsibility of each employee to maintain and keep secure. If either card is lost or stolen, the employee must notify their manager and the IT Manager of their facility immediately. The lost card will be deactivated and a new card issued **after it is signed for by the employee.**

**Recommend**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**CHANGE MANAGEMENT**

**POLICY:** F40

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

**Overview**

The objective of change management in this context is to ensure that standardized methods and procedures are used for efficient and prompt handling of all changes to control IT infrastructure, in order to minimize the number and impact of any related incidents upon service.

**Purpose**

To control all changes to equipment, software or procedures will be established and followed for change, integrating operational and application change control procedures, and logging all changes.

**Types of Significant Change**

There are three types of significant change that should be considered:

**Standard Change** – Standard Change is a consistent or routine change that takes place on a regular interval (weekly, monthly, quarterly, yearly) that should be formally reviewed and approved before being implemented. These changes have fairly common steps and guidelines and are generally low risk to the environment and seldomly require modification.

*Once approved, this change does not need to go back to a change advisory board (CAB) or administration team for regular approval.*

However, the schedule for change must be published and communicated on a regular basis. Additionally, if a standard change causes an issue or outage, it must be brought back to the CAB for review and discussion.

Examples of Standard Change:

- Lifecycle replacement of hardware
- Routine Software Patching and Updates
- Firewall Changes not requiring a service outage
- DNS entries

**Normal Change** – Normal Change is a change that may be common, but may also be unique in its construct. A normal change should be reviewed (and approved/scheduled or denied) by the CAB or administration as it may contain risk to the environment such as system downtime, data loss, security risk, enumeration or dissemination of PII, PHI, or other types of information.

### Examples of Normal Change:

- Storage or Virtualization Platform replacement
- Application upgrade that impacts functionality or the data model of a system
- Telephone system enhancement or upgrade work that may cause an outage

**Emergency Change** – Emergency Change is a Normal Change that must be introduced and implemented as soon as possible, even before the CAB or administration team needs to approve or deny the change. These changes typically represent a crisis or opportunity that must be addressed without undue risk to the district. While the change may need to be implemented before a CAB meeting, the change **MUST** still go through the CAB or administration team **AFTER** implementation so they can review the efficacy of the change and the emergency nature of it and provide their approval or dissent to the change. **YOU MAY NOT SKIP THIS PART OF THE PROCESS.**

### Examples of Emergency Change:

- Implementing a security patch to a zero-day exploit
- Isolating the network from a large-scale Distributed Denial of Service (DDOS) Attack

## Change Management Requirements

There shall be a formal approval for proposed changes that could potentially impact the operational environment. Prior to any operational change there shall be a risk assessment that:

- Identifies significant changes.
- Records significant changes.
- Assesses the potential impact of such changes.
- Procedures and responsibilities for aborting and recovering from unsuccessful changes
- All changes shall be reviewed in advance and requires the written approval of the or designee.
- All changes shall be communicated to all relevant individuals.

## Change Policies Computers/Workstations

There shall be a formal approval for proposed Local Administrator Access: WCUUSD service users will not have the right to change the local administrator passwords on WCUUSD provided desktop computers. Service Users may request access to the local administrators group from the Information Technology Department, however, this will void the computer and the service user from being supported by the Information Technology Group. Systems that have been modified and require the assistance of the Information Technology Department will be re-loaded with the original software configuration that the Information Technology Department supplies to service users when issued a new system.

**Network Configuration Changes:** The standard configuration on WCUUSD laptops is configured so that in most cases the computer can be transferred from network to network without any configuration changes. If a user requires special circumstances to be accounted for, they should reference the sections: “Change policies, as related to desktop



computers/workstations: Local Administrator Access” and “Remote Access Computing Policies” in this document.

**Changes to Hardware:** Computer equipment supplied by WCUUSD must not be altered or added to in any way (e.g., upgraded processor, expanded memory, or extra circuit boards) without prior knowledge and authorization from the Information Technology Department.

**Changes NOT Related:** Any changes that are not related to the changes listed above must adhere to and comply with the Corporate Change Management Policy and Procedure.

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**REASONABLE CARE IN PROTECTING  
PROPRIETARY AND/OR CONFIDENTIAL  
INFORMATION**

**POLICY:** F41

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**Purpose**

When WCUUSD service users are engaged in communication involving proprietary or confidential information from external or un-trusted networks, the use of encryption must be employed. The Information Technology Department has made available policies and procedures for service users that require remote access, these systems must be used for the transmission of sensitive information. For example, the use of the corporate VPN (IPsec), Secure Sockets Layer (SSL/https) or Transport Layer Security (TLS/https) is required for accessing WCUUSD systems when dealing with sensitive information across the Internet. Resources that are not encrypted by default should be avoided.

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**DATA RETENTION AND STORAGE POLICY**

**POLICY:** F22 Possible or F42

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

**Overview**

All WCUUSD information must be backed up to WCUUSD Network Storage or authorized Information Technology Department methods only. The use of external drives (thumb drives, UBS drives, etc.) must be approved **by the Superintendent or the Superintendent's designee.**

**Purpose**

To ensure Data Retention and Storage of data is controlled as outlined by industry, federal and/or state requirements. Additionally, information must be consistently protected throughout its life cycle, from its origination to its destruction. This Policy provides guidelines concerning the length of time official records should be retained under ordinary business circumstances.

**Covered Records:**

This Policy applies to all official records generated in the course of the WCUUSD operations, including but not limited to:

- Typed, or printed hardcopy (i.e., paper) documents.
- Electronic records and documents (e.g., email, Web files, text files, PDF files).
- Video or digital images.
- Graphic representations.
- Electronically stored information on network servers and/or document management systems.
- Recorded audio material

**Minimize Storage and Retention of Sensitive Data**

Sensitive data storage will be kept to the minimum necessary to conduct business operations. Sensitive data shall only be retained for that amount of time which is required for business, legal, and/or regulatory purposes.

At no time shall any sensitive data be stored in any form outside of approved systems without expressed written permission from **the Superintendent or Superintendent's designee.** The following storage mechanisms for sensitive information are prohibited, **unless otherwise noted:**

- Hardcopy, including guest books, paper notes, notebooks, receipts, or any other hardcopy format.

- Personal computers, including laptops, personal digital assistants, tablets, cell phones or other devices, ~~whether personally owned or WCUUSD resources.~~
- Should any district employee, who has approval from the Superintendent or Superintendent's designee, access student or personnel records (i.e. Infinite Campus, Canvas, etc.) for school purposes from a personal phone, PC, or other device that is not owned by the district, they MUST document the access, and then immediately remove the information from their personal device as soon as they are done handling the immediate school matter.
- Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records.
- **SUSPENSION OF RECORD DISPOSAL IN EVENT OF LITIGATION OR CLAIMS** In the event any employee of WCUUSD reasonably anticipates or becomes aware of a legal investigation or audit concerning the district, the school, or any employee within the district, such employee shall inform the Administration, the Superintendent and Board of Directors and any further disposal of documents shall be suspended until such time as the Board of Directors, with the advice of the Superintendent and WCUUSD's legal counsel, determines otherwise. The Administration shall take such steps as are necessary to promptly inform affected staff of any suspension in the disposal or destruction of documents.
- **CONFIDENTIALITY AND OWNERSHIP** All records are the property of WCUUSD, and employees are expected to hold all business records in confidence and to treat them as WCUUSD assets. Records must be safeguarded and may be disclosed to parties outside of the district only upon proper authorization. Any subpoena, court order or other request for documents received by employees, or questions regarding the release of the Agency's records, must be directed to the Administration, Superintendent, and Board of Directors prior to the release of such records. Any records of WCUUSD in possession of an employee must be returned to the employee's supervisor upon termination of employment. This policy is not intended to and does not constitute or create contractual terms of employment, assure specific treatment under specific conditions, and/or does not alter the nature of any employment relationship with WCUUSD.

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**BACKUPS**

**POLICY:** F43

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**Individual User Responsibility:** WCUUSD users must ensure that information that represents any part of a plan, system design, or that relates to the management of accounts are adequately protected from loss. **District file servers and information stored in Google GSuite in the cloud** are frequently backed up and archived; this is the suggested method for ensuring that information loss is prevented. If a user is unable to ensure adequate loss protection, they should contact the WCUUSD Information Technology Helpdesk (ithelp@u32.org) for assistance in resolution of this problem.

**Not Responsible for Backups of District or Personal Data stored locally on devices:** WCUUSD information systems are for official district use. **No Personal data should be stored on district systems.** WCUUSD will not backup user's district, school or personal data files or programs that are not stored on WCUUSD servers (**or in the Google G-Suite environment**) or have no relevance to WCUUSD business. Examples include but are not limited to encoded music files, digital images **personal pictures** and games. The Information Technology Department may remove such items from WCUUSD systems at their discretion without prior warning to individuals.

**General Storage Rules**

- Maintain records in an appropriate storage form (i.e., Storage area network, network attached storage, paper, magnetic tape, microfilm, flash drive, optical disk) for the recommended length of time indicated by this policy.
- All records being prepared for storage should be described and include the following information on a label in order to facilitate their reference, review, and destruction:
  - The inclusive dates
  - Originating department name
  - Type of media
  - Date of destruction
  - Contact name and telephone number.
- Ensure the appropriate forms of records are complete and copies of such records can be reproduced in a complete and readable form upon request.
- Store all records in a manner that permits the efficient retrieval of stored records and the efficient return of records borrowed from storage.
- Restrict access to stored records to those individuals who have an appropriate need and permission to retrieve the records.

- Ensure all records are stored in a climate-controlled location with protection from hazards (i.e., theft, water, fire).
- Confirm that records copied onto an alternative storage medium (storage area network, network attached storage, microfiche, diskette, tape) are complete and readable before the original paper record is destroyed. All records stored in an alternate format must be available for reading and/or duplicating within a reasonable timeframe. Once records have been transferred, the original version can be destroyed according to this policy.
- Protect computerized data with password, code or card system.
- The Uniform Preservation of Business Records Act requires retention of general business records for three years from the creation of such records if no retention period is specified by regulation.
- Credit card transaction data should be stored only as long as required for financial tracking and auditing purposes. The specific credit card holder information such as the account number, expiration date, or other magnetic stripe information should never be stored in electronic format unless specific approval is received from the IT Department and the WCUUSD Policy Committee.

**Required**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**DISTRICT TAKE HOME DEVICE &  
PERSONAL DEVICE POLICY**

**POLICY:**     D3 Possibly    

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**Overview**

The mission of the District Take Home Device & Personal Device Policy in WCUUSD is to create a collaborative learning environment for all learners. This environment will support students and teachers in the use of technology to enhance student learning and engagement in the classroom. It will create equity and level the playing field for all learners by providing every student with a device to use both in school and at home.

In 2019 the District expanded the use of Chromebooks and the ability for students to take home the devices to support their schoolwork. Students at all WCUUSD schools will have the opportunity to check out a district-owned Chromebook (Grades 3-12) or Tablets (Grades PreK-2) for the school year. This device will allow filtered access via the district network to educational resources and materials needed for students to be successful. It will also allow all student access to G Suite for Education, online textbooks, educational web-based tools, and many other useful websites.

**Education and Access**

G Suite for Education is a closed system whereby only students and staff have access. It includes applications that enable students to:

- Create projects
- Collaborate with their classmates
- Send emails to students and teachers
- Submit assignments

As a G Suite for Education District, we are able to monitor student Chromebook activity through web-based management tools.

Before each Chromebook device connects to the Internet, it must pass through district network firewalls and filters. This happens whether the device is browsing at school or home using another WiFi router that is providing the Internet connection. We are currently using Content Keeper for Chromebook and other background tools.

**Daily Care and Maintenance**

Students are responsible for the general care of the Chromebook they have been issued by the school. Chromebooks that are broken, or fail to work properly, must be submitted to IT or designated staff. Do not take District owned Chromebooks to an outside computer service for any type of repairs or

maintenance. Do not attempt to repair the device yourself. We understand accidents happen. Report them immediately so that the district can fix the device.

- Students are responsible for bringing fully charged Chromebooks for use each school day.
- Chromebooks must have a District asset tag on them at all times and this tag must not be removed or altered in any way. If removed there may be disciplinary action.
- No food or drink is allowed next to your Chromebook while it is in use.
- Cords, cables, and removable storage devices must be inserted carefully into the Chromebook. Plug-in connectors are **fragile** and must be handled with care.
- Never transport your Chromebook with the power cord plugged in. Never store your Chromebook in your carry case or backpack while plugged in.
- Clean the screen with a soft, dry microfiber cloth or anti-static cloth. No liquids.
- Student should never leave a Chromebook unattended, such as in a vehicle or any unsupervised area.
- Transport Chromebooks with care, Chromebook lids should always be closed and tightly secured when moving.
- Never move a Chromebook by lifting from the screen. Always support a Chromebook from its base with the lid closed and open or close it using two hands.

**Chromebook screens can be easily damaged! The screens are particularly sensitive to damage from excessive pressure on the screen.**

- Do not store the Chromebook with the screen in the open position or tablet mode.
- Do not place anything on the Chromebook that could put pressure on the top or screen.
- Do not poke the screen with anything that **may** mark or scratch the screen surface.
- Do not place anything on the keyboard before closing the lid (e.g., pens or pencils)
- Do not place the device near magnets or anything with high electric current.
- Do not place anything in the sleeve or backpack that **may** press against the cover.

### **Digital Citizenship and Internet Safety**

WCCUSD asks that all computing equipment is used for educational purposes or to support those employees who provide educational services. We expect device holders to use electronic resources safely and responsibly. We ask that students engage a trusted adult if you are unsure about something related to the use of your computer or electronic resources. We **ask** that you **do not** share your account information or the account information of others. Never post or share pictures of yourself or others unless you have school permission. Please tell a trusted adult if you come across something that is dangerous or disturbing. All school rules for how you behave and how you treat others apply for in-person and for electronic communications.

### **Security, Filtering, and Monitoring**

The school district is required by law to provide certain levels of filtering and monitoring of the use of all district owned technology and electronic resources. All students are expected to support these efforts to provide a safe and legal electronic learning environment. It is expected that parents/guardians will monitor the student's use of the Internet at home so that the district-owned device is not used to access illegal or inappropriate websites or download any material from those sites. Please be aware of these cautions.

- Do not use district equipment or electronic resources for commercial or personal gain.
- Do not use district resources for political purposes, like trying to influence elections.
- Do not use district resources for anything illegal or indecent such as bullying, posting inappropriate images or text, or passing along information that is harmful or inappropriate.



- Do not participate in any activity to alter, bypass or attempt to bypass the school district network, security settings, filters, safety settings, or user roles.
- Do not install or download personal software or applications (apps), games, or operating systems.

### **Lost or Damaged Equipment**

Students and parents **are** responsible for district-owned technology that is issued to them, just as they are for other district-owned items such as textbooks, athletic equipment, or library books. The district will repair or replace the device, but students and parents may be responsible for the cost of those repairs or replaced devices. Please remind your student to report a missing Chromebook to the library staff or classroom teacher (in-person or via email) as **soon** as it's misplaced. We can help them locate. After 24 hours we will disable the device.

The WCUUSD Transportation Staff have been asked to return any found devices to the U-32 Technology Office.

Submit Chromebooks that need repair, with the sleeve and power cord to the Building Technology Specialist, teacher-librarian, or classroom teacher depending on your school. If we are able to fix the device, we will do so and return it. If we are unable to fix the problem, we will issue a new device. Physical damage or lost equipment may cost a student or employee the replacement fee of \$400.

### **Use of Personal Electronic Devices**

In accordance with all district policies and procedures, students and staff may use personal electronic devices such as, but not limited to, laptops, mobile devices, cell phones, and e-readers to promote student learning and to further the educational and research mission of the district. The use of personally owned devices at school by staff and students is voluntary and a privilege, and subject to all school district policies and procedures. School staff will retain the final authority in deciding when and how students may use personal electronic devices on school grounds and during any school-related activity.

The district assumes no liability or responsibility for any act of a staff, student or guest user that is inconsistent with school district policies and procedures. Any individual who brings personally owned devices onto school property is solely responsible for that equipment.

If the District has reasonable cause to believe a staff member or student has violated school district policies or procedures authorized personnel may confiscate and hold ~~and search~~ a staff member, student's or guest user's mobile or personal device in accordance with school district policies and procedures **for privacy and security**.

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**PASSWORD MANAGEMENT**

**POLICY:** F44

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**Overview**

Strong and consistent management of user IDs and passwords enables the WCUUSD to authenticate individual users, trace actions to users, and fully utilize the secure features of the network and system infrastructure of the organization and to protect sensitive information to the fullest extent practical. All employees and personnel that manage or have access to systems and networks must adhere to the password policies defined below in order to protect the security of sensitive information and data.

**Purpose**

This policy applies to any and all personnel who have any form of user or administrator account requiring a password on any network, system, or system component.

**Scope**

The scope of this policy includes all personnel who have or are responsible for an account (or any form of access that supports or requires a password) on any system that resides at any WCUUSD facility, has access to the WCUUSD network, or stores any non-public WCUUSD information.

**User ID & Password**

**User-IDs and Passwords:** WCUUSD requires that each service user accessing multi-user information systems have a unique user-ID and a private password. The unique user-ID and in some cases, the initial password will be issued by WCUUSD Information Technology Department. All issued passwords must be changed at first login and is enforced through group policy. These user-IDs must then be employed to restrict system privileges based on job duties, project responsibilities, and other business activities. Each service user is personally responsible for the usage of his or her user-ID and password. All activity logged under a user account is the responsibility of the user who owns the account.

**Role Accounts/Anonymous User-IDs:** With the exception of electronic bulletin boards, Internet web sites, and other systems where all regular users are intended to be anonymous, users are prohibited from logging into any WCUUSD system or network anonymously. Anonymous access might, for example, involve use of "guest" user-IDs. When users employ system commands that allow them to change active user-IDs to gain certain privileges, they must have initially logged-in employing user-IDs that clearly indicated their identities. This might, for example, take place on UNIX systems with the SU command. Demonstration software and/or demonstration systems for customers are exempt in that a customer may access the system anonymously; however, all

administrative tasks performed by WCUUSD employees, representatives, contractors, or otherwise must not be anonymous.

**Difficult-to-Guess Passwords:** To ensure that password systems do the job they were intended to do; users must choose passwords that are difficult-to-guess. This means that passwords must NOT be related to one's job or personal life. For example, a car license plate number, a spouse's name, or fragments of an address must not be used. This also means passwords must not be a word found in the dictionary or some other part of speech. For example, proper names, places, technical terms, and slang must not be used. The password "WCUUSD" must never be used (regardless of upper or lower case) on network (public or private) connected systems, even for demonstration accounts or public access. The password length must be a minimum of eight alphanumeric characters with the maximum number of characters being system dependent. Creating passwords that are at least 15 characters or more can ensure a more secure environment. If words are used in your password, ensure that you are using non-compound words.

**Random Characters Must Be Used:** At least one special character and one numeric character should be used to increase the difficulty in guessing passwords. An example would be the numeric character '3' in place of the letter 'E'. Special and Numeric characters include numbers, punctuation marks, and delimiting characters such as the "@" symbol.

**Passwords Change Frequency:** Passwords should only be changed when there is a reason to believe that a password has been compromised. Changes should occur every year for privileged accounts. This must be enforced by software controls on multi-user systems and within the Active Directory domain. Additionally, passwords must not be re-used. All multi-user systems, which have the capability to prevent the re-use of passwords, will not allow a user to enter a password that has been recently used, within 5 uses. Additionally, software controls may be employed that prevent the repeated changing of passwords to facilitate the minimum number of changes within a short period of time.

**Password Storage:** Passwords must not be stored in readable form in batch files, automatic log-in scripts, software macros, terminal function keys, in computers without access control systems, or in other locations where unauthorized persons might discover them. Similarly, passwords must not be written down in some readily decipherable form and left in a place where unauthorized persons might discover them.

**Sharing Passwords:** If users need to share computer-resident data, they should use electronic mail, group-ware databases, public directories on local area network servers, and other similar mechanisms. Although user-IDs are shared for electronic mail and other purposes, passwords must never be shared with or revealed to others. Users should not disclose passwords to administrative staff or to managers, even when requested to do so – the password for a user account is not required for administrative purposes and any request for your password should be viewed as suspicious. The exception to this is the 'Administrator' or 'root' password, which is shared by users who require special access. Sharing a password (or any other access mechanism such as a dynamic password token) exposes the authorized user to responsibility for actions that the other party takes using the disclosed password. If a service user believes that someone else is using his or her user-ID and password, the service user must immediately notify the administrator for the information system in question. If a password is discovered written down in an easily accessible location (for example on a whiteboard, or written on a sticky note attached to the bottom of a keyboard) the account will be treated as if it had been disclosed and will be disabled.

## **Multi-Factor Authentication**

The implementation of Multi-factor authentication is highly encouraged whenever applicable not only for work accounts but for personal accounts too.

**Privileged User-IDS and Passwords:** Certain privileged accesses on production systems require the use of the administrative or Super-User (root) accounts. Knowledge and use of such user-IDS shall be restricted to a need-to-know basis. All users granted such access shall have their names added to the authorized administrative user list and shall be removed when access is no longer required. If a privileged user-ID/password has been determined to be compromised, then the scope of the compromise must be assessed and all passwords relating to the compromised system must be changed as appropriate.

**Password Policy Conformance Auditing:** From time to time the Information Technology Department or the Security Team may audit the multi-user computer systems for password policy conformance. If a password is not long enough (16+ characters) or does not contain enough special characters or is based on a dictionary word and is easily guessed, the account related to the weak password will be required to choose a more secure password. Audits may also include checking the vicinity of one's workspace for passwords that have been written down (sticky note on keyboard) but will not include a search of personal effects or within desk drawers.

**Password Account Blocking:** After six consecutive login failures an account will be blocked from further access for a minimum of 30 minutes (not including Network Infrastructure). If a user has had an account disabled in such a manner, they must contact the Information Technology Helpdesk following the IT Support Request Process to have the account re-enabled if it is necessary for the account to be accessible within the lockout time frame.

**Violations of Password Policy:** In the event that a password has been disclosed, either by accident or by the negligence of a user, the account in question must be disabled. In order for a service user to regain access to computing resources, an internal ticket request must be submitted by the user's manager before the account may be re-enabled for their use. Repeated violations or disclosure of access control information to an outside party will result in disciplinary action up to and including termination of employment. If your account has been disabled or you suspect that it has been disclosed, please immediately contact the Help Desk ([ithelp@u32.org](mailto:ithelp@u32.org))

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**ACCEPTABLE USE POLICY**

**POLICY:** F45

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**Overview**

WCUUSD's intentions for publishing an Acceptable Use Policy are not to impose restrictions that are contrary to WCUUSD's established culture of openness, trust and integrity. IT is committed to protecting WCUUSD's employees, partners and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

The question of Internet safety includes issues regarding the use of the Internet, Internet-capable computing devices, and other electronic devices in a manner that promotes safe online activity for children, protects children from cybercrimes, including crimes by online predators and cyberbullying, and helps parents shield their children from materials that are inappropriate for minors. To promote the safe and appropriate online behavior of students and staff as they access material from the Internet, the district will use the following four-part approach. However, given the ever-changing nature of the Internet, the district cannot guarantee that a student will never be able to access objectionable material.

Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, WWW browsing, and FTP, are the property of WCUUSD. These systems are to be used for business purposes in serving the interests of the company, and of our clients and customers in the course of normal operations. Please review Human Resources policies for further details.

Effective security is a team effort involving the participation and support of every WCUUSD employee and affiliate who deals with information and/or information systems. It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.

***It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.***

**Purpose**

This policy applies to employees, contractors, consultants, temporary and other workers, including all personnel affiliated with third parties. This policy applies to all equipment that is owned and/or leased by WCUUSD.

## **Scope**

This policy applies to the use of information, electronic and computing devices, and network resources to conduct WCUUSD business or interact with internal networks and business systems, whether owned or leased by WCUUSD, the employee, or a third party. All employees, contractors, consultants, temporary, and other workers at WCUUSD and its subsidiaries are responsible for exercising good judgment regarding appropriate use of information, electronic devices, and network resources in accordance with WCUUSD policies and standards, and local laws and regulation. This policy applies to employees, contractors, consultants, temporaries, and other workers at WCUUSD, including all personnel affiliated with third parties. This policy applies to all equipment that is owned or leased by WCUUSD.

## **Right to Search and Monitor – No Expectation of Privacy**

To ensure compliance with WCUUSD internal policies as well as applicable laws and regulations, and to ensure service user safety, WCUUSD administration reserves the right to monitor, inspect, and/or search at any time all WCUUSD information systems. This examination may take place with or without the consent, presence, or knowledge of the involved service users. The information systems subject to such examination include, but are not limited to, electronic mail system files, personal computer hard drive files, voicemail files, printer spool files, fax machine output, desk drawers, and storage areas. All searches of this nature will be conducted after the approval of the Legal and Human Resources Departments.

All district-owned and personally owned Internet-capable devices in all district facilities accessing the Internet through district network resources will be filtered and monitored to prevent access to obscene, racist, hateful, violent, or other objectionable material as specified in the FCC Children's Internet Protection Act or district policies.

Since WCUUSD's computers and networks are provided for business purposes only, service users should have no expectation of privacy associated with the information they store in or send through these information systems. WCUUSD administration additionally retains the right to remove from its information systems any material it views as offensive or potentially illegal. WCUUSD reserves the right to turn over potentially illegal material to law enforcement for civil and or criminal prosecution.

## **Internet Access / Acceptable Use for Personal Activity**

Service users are generally provided with Internet access to perform their job duties, but this access may be terminated at any time at the discretion of a service user's supervisor. Service users must take special care to ensure that they do not represent WCUUSD in an official capacity on Internet discussion groups and in other public forums, unless they have previously received administration authorization to act in this capacity. All information received from the Internet should be considered

to be suspect until confirmed by reliable sources; there is a great deal of inaccurate and deliberately misleading information available on the Internet. Separately, service users must not place WCUUSD material (software, internal memos, press releases, databases, etc.) on any publicly accessible computer system such as the Internet, unless both the information Owner and the Information Technology Department have first approved the posting. On a related note, sensitive information must not be sent across the Internet unless it is in encrypted form.

### **Supervision**

When students and staff access the Internet from any district facility, district staff will make a reasonable effort to supervise student access and use of the Internet. If material is accessed that violates district policies, procedures and/or the network use agreement, then district staff may instruct the person to cease using that material and/or implement sanctions contained in district policies, procedures and/or the network use agreement.

### **Unbecoming Conduct**

**Prohibited Activities:** Users must not test or attempt to compromise computer or communication system security measures unless specifically approved in advance and in writing by the WCUUSD IT Team or is specifically a part of their job duties. Incidents involving unapproved system cracking (hacking), password cracking (guessing), file decryption, bootleg software copying, or similar unauthorized attempts to compromise security measures may be unlawful and will be considered serious violations of WCUUSD internal policy. Likewise, short-cuts bypassing systems security measures, as well as pranks and practical jokes involving the compromise of systems security measures are absolutely prohibited.

**Harassing or Offensive Materials:** WCUUSD computer and communications systems are not intended to be used for and must not be used for the exercise of the service users' right to free speech. Sexual, ethnic, and racial harassment --including unwanted telephone calls, electronic mail, and internal mail -- is strictly prohibited and is cause for disciplinary action up to and including termination of employment. Service users are encouraged to promptly report the communications to their manager and the Human Resources Department. WCUUSD retains the right to remove from its information systems any material it views as offensive or potentially illegal.

**Appropriate Behavior:** To avoid legal problems, whenever any affiliation with WCUUSD is included with an Internet message or posting, "flaming" or similar written attacks are strictly prohibited. Likewise, service users must not make threats against another user or organization over the Internet. All Internet messages intended to harass, annoy, or alarm another person are similarly prohibited.

**Business Activities not Related to WCUUSD:** It will be a violation of policy for any user to conduct business other than that of Washington Central Unified Union School District on WCUUSD Information Systems.

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**ELECTRONIC MAIL**

**POLICY:** F47

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

**Overview**

Electronic email is pervasively used in almost all industry verticals and is often the primary communication and awareness method within an organization. At the same time, misuse of email can post many legal, privacy and security risks, thus it's important for users to understand the appropriate use of electronic communications.

**Purpose**

The purpose of this email policy is to ensure the proper use of WCUUSD email system and make users aware of what WCUUSD deems as acceptable and unacceptable use of its email system. This policy outlines the minimum requirements for use of email within WCUUSD Network.

**Scope**

This policy covers appropriate use of any email sent from a WCUUSD email address and applies to all employees, vendors, and agents operating on behalf of WCUUSD.

**Policy**

- All use of email must be consistent with WCUUSD policies and procedures of ethical conduct, safety, compliance with applicable laws and proper business practices.
- WCUUSD email account should be used primarily for WCUUSD business-related purposes; personal communication is permitted on a limited basis, but non-WCUUSD related commercial uses are prohibited.
- All WCUUSD data contained within an email message or an attachment must be secured according to the Data Protection Standard.
- Email should be retained only if it qualifies as a WCUUSD business record. Email is a WCUUSD business record if there exists a legitimate and ongoing business reason to preserve the information contained in the email.
- Email that is identified as a WCUUSD business record shall be retained according to WCUUSD Record Retention Schedule.
- The WCUUSD email system shall not to be used for the creation or distribution of any disruptive or offensive messages, including offensive comments about race, gender, hair color, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. Employees who receive any emails with this content from any WCUUSD employee should report the matter to their supervisor immediately.
- Users are prohibited from automatically forwarding WCUUSD email to a third-party email system. Individual messages which are forwarded by the user must not contain WCUUSD confidential or above information.



- Users are prohibited from using third-party email systems and storage servers such as Google, Yahoo, and MSN Hotmail etc. to conduct WCUUSD business, to create or memorialize any binding transactions, or to store or retain email on behalf of WCUUSD. Such communications and transactions should be conducted through proper channels using WCUUSD-approved documentation.
- Using a reasonable amount of WCUUSD resources for personal emails is acceptable, but *non-work-related* email shall be saved in a separate folder from work related email. Sending chain letters or joke emails from a WCUUSD email account is prohibited.
- WCUUSD employees shall have no expectation of privacy in anything they store, send or receive on the company's email system.
- WCUUSD may monitor messages without prior notice. WCUUSD is not obliged to monitor email messages.

The Internet has been plagued with hoaxes alleging various security problems. Many of these hoaxes take the form of phishing attacks or chain letters, which request that the receiving party send the message to other people. Service users in receipt of information about system vulnerabilities should forward it to the WCUUSD Information Technology Helpdesk (ithelp@u32.org), who will then determine what if any action is appropriate. Service users must not personally redistribute system vulnerability information.

**Distribution of Unsolicited WCUUSD Marketing:** Service users must not use facsimile (fax) machines, electronic mail, instant messenger, auto-dialer robot voice systems, or any other electronic communications systems for the distribution of unsolicited advertising material.

**Recommended**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**INCIDENT RESPONSE POLICY AND PLAN**

**POLICY:** F48

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**Overview**

In accordance with security best practices, all security incidents will be formally documented and responded to. This policy provides some general guidelines and procedures for dealing with computer security incidents.

**Purpose**

The WCUUSD is committed to maintaining the security of electronic information. Formal practices of tracking and mitigating security incidents will aid in assessing potential risks and vulnerabilities to data. As such, WCUUSD will continually assess risks and improve security measures.

**Incident Examples**

Some examples of possible incident categories include:

- Compromise of system or data integrity
- Denial of system resources.
- Illegal access to a system (either a penetration or an intrusion).
- Malicious use of system resources
- Inadvertent damage to a system.
- Malware or virus detection.

Some possible scenarios for security incidents are:

- Loss of a laptop or device containing, HIPAA, PII and/or other WCUUSD – data.
- Suspicious activities or anomalies that are identified through intrusion detection, firewall or other network device logs. You have discovered a major virus has infected multiple systems.
- Damage, intentional or accidental, to equipment or system affecting its ability to perform its job.
- Unauthorized wireless access points.

**Incident Reporting**

All suspected policy violations, system intrusions, virus infestations, and other conditions which might jeopardize WCUUSD information or WCUUSD information systems must be immediately reported to the WCUUSD Information Technology Helpdesk (ithelp@u32.org), who will coordinate with the WCUUSD Director of Technology and/or Superintendent.

**Required**

**WASHINGTON CENTRAL UNIFIED  
UNION SCHOOL DISTRICT**

**Board of Directors' Policy**

**ELECTRONIC COMMUNICATION BETWEEN  
EMPLOYEES AND STUDENTS**

**POLICY:**     **B8**    

**WARNED:** \_\_\_\_\_

**ADOPTED:** \_\_\_\_\_

**EFFECTIVE:** \_\_\_\_\_

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**I. Statement of Policy**

The Washington Central Unified Union School District (WCUUSD) recognizes electronic communications, and the use of social media outlets create new options for extending and enhancing the educational program of the school district. Electronic communications and the use of social media can help students and employees communicate regarding: questions during non-school hours regarding homework or other assignments; scheduling issues for school-related co-curricular and interscholastic athletic activities; school work to be completed during a student's extended absence; distance learning opportunities; and other professional communications that can enhance teaching and learning opportunities between employees and students. However, the WCUUSD recognizes employees and students can be vulnerable in electronic communications.

In accordance with Act 5 of 2018 this model policy is adopted to provide guidance and direction to WCUUSD employees to prevent improper electronic communications between employees and students.

**II. Definitions. For purposes of this policy, the following definitions apply:**

- A. **Electronic communication.** Electronic communication is any computer-mediated communication in which individuals exchange messages with others, either individually or in groups. Examples of electronic communication include, but are not limited to, email, text messages, instant messaging, voicemail, and image sharing and communications made by means of an internet site, including social media and social networking websites.
- B. **Social media.** Social media is any form of online publication or presence that allows interactive communication, including, but not limited to, social networks, blogs, websites and internet forums. Examples of social media include, but are not limited to, Facebook, Twitter, Instagram, YouTube, and Google+.
- C. **Employee.** Employee includes any person employed directly by or retained through a contract of employment the district, an agent of the school, a school board member, and including supervisory union employees.
- D. **Student.** Student means any person who attends school in any of the grades Prekindergarten through 12 operated by the district.

**III. Policy on Electronic Communication Between Students and Employees.**

All communication between employees and students shall be professional and appropriate. The use of electronic communication that is inappropriate in content is prohibited.

**A. Inappropriate content of an electronic communication.** Inappropriate content of an electronic communication between an Employee and a Student includes, but is not limited to:

1. Communications of a sexual nature, sexual oriented humor or language, sexual advances, or content with a sexual overtone;
2. Communications involving the use, encouraging the use, or promoting or advocating the use of alcohol or tobacco, the illegal use of prescription drugs or controlled dangerous substances, illegal gambling, or other illegal activities;
3. Communications regarding the employees' or student's past or current romantic relationships;
4. Communications which include the use of profanities, obscene language, lewd comments, or pornography;
5. Communications that are harassing, intimidating, or demeaning;
6. Communications requesting or trying to establish a personal relationship with a student beyond the employees' professional responsibilities;
7. Communications related to personal or confidential information regarding employee or student that isn't academically focused; and
8. Communications between an employee and a student between the hours of 10 p.m. and 6 a.m. An Employee may, however, make public posts to a social network site, blog or similar application at any time.

**B. Procedures.** The superintendent shall develop procedures for both the receipt and handling of reports filed under this policy (see IV.A. and B. below).

#### **IV. Enforcement Responsibilities**

**A. Student communications violation of this policy.** In the event a student sends an electronic communication, that is inappropriate as defined in this policy or that violates the procedures governing inappropriate forms of electronic communication to an employee, the employee shall submit a written report of the inappropriate communication ("Report") to the principal or designee by the end of the next school day following actual receipt by the Employee of such communication. The principal or designee will take appropriate action to have the student discontinue such improper electronic communications.

While the school district will seek to use such improper electronic communications by a student as a teaching and learning opportunity, student communications violation of this policy may subject a student to discipline. Any discipline imposed shall take into account the relevant surrounding facts and circumstances.

**B. Employee communications violation of this policy.** In the event an employee sends an electronic communication that is inappropriate as defined in this policy or that violates the procedures governing inappropriate forms of electronic communication to a student, the student shall or the student's parent or guardian may submit a written report of the inappropriate communication ("Report") to the principal and/or the person designated by the principal to receive complaints under this policy promptly. The report shall specify what type

of inappropriate communication was sent by the employee with a copy of the communication, if possible.

Inappropriate electronic communications by an employee may result in appropriate disciplinary action.

C. **Applicability.** The provisions of this policy shall be applicable at all times while the employee is employed by the district and at all times the student is enrolled in the school district, including holiday and summer breaks. An employee is not subject to these provisions to the extent the employee has a family relationship with a student (i.e. parent/child, nieces, nephews, grandchildren, etc.).

D. **Other district policies.** Improper electronic communications that may also constitute violations of other policies of the district, i.e. unwelcome sexual conduct may also constitute a violation of the school's separate policy on the Prevention of Harassment, Hazing and Bullying of Students. Complaints regarding such behavior should be directed as set forth in the school's Procedures on the Prevention of Harassment, Hazing and Bullying of Students.

## V. Reporting to Other Agencies

A. **Reports to Department of Children and Families [DCF].** When behaviors violative of this policy include allegations of child abuse, any person responsible for reporting suspected child abuse under 33 V.S.A. §4911, et seq., must report the allegations to the Commissioner of DCF. If the victim is over the age of 18 and a report of abuse is warranted, the report shall be made to Adult Protective Services in accordance with 33 V.S.A. §6901 et seq.

B. **Reports to Vermont Agency of Education [AOE].** Accordingly, if behaviors violative of this policy in a public school involve conduct by a licensed educator that might be grounds under Vermont law for licensing action, the principal shall report the alleged conduct to the superintendent and the superintendent shall report the alleged conduct to the AOE.

C. **Reporting Incidents to the Police.** Nothing in this policy shall preclude persons from reporting to law enforcement any incidents and/or conduct that may be a criminal act.

D. **Continuing Obligation to Investigate.** Reports made to either DCF or law enforcement shall not be considered to absolve the school administrators of their obligations under this or any other policy, such as the Policy on the Prevention of Harassment, Hazing and Bullying, to pursue and complete an investigation upon receipt of notice of conduct which may constitute a policy violation.

<i>Legal Reference(s):</i>	2018 Acts and Resolves No. 5 (located at <a href="https://legislature.vermont.gov/Documents/2018.1/Docs/ACTS/ACT005/ACT005%20As%20Enacted.pdf">https://legislature.vermont.gov/Documents/2018.1/Docs/ACTS/ACT005/ACT005%20As%20Enacted.pdf</a> )
	16 V.S.A. § 1698
	16 V.S.A. § 570