

Recommended

**WASHINGTON CENTRAL UNIFIED
UNION SCHOOL DISTRICT**

Board of Directors' Policy

DATA RETENTION AND STORAGE POLICY

POLICY: F22

WARNED: 1.27.21

ADOPTED: 2.17.21

EFFECTIVE: 2.17.21

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.
- Should any district employee, who has approval from the Superintendent or Superintendent's designee, access student or personnel records (i.e. student information system, learning management system 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.