PERSONAL INFORMATION SYSTEMS

The Board of Education shall maintain, from time to time, personal information systems which relate to students, teachers or other employees. The guidelines for the operation of such personal information systems are as follows.

A. Operation of a System

1. The Superintendent or designee shall be directly responsible for the operation of all personal information systems.

2. Every employee who has any responsibility for the operation or maintenance of a system or the personal information contained in a system shall receive a copy of these rules and regulations and shall conduct themselves in accordance with them, as well as the provisions of O.R.C. Chapter 1347.

3. The purpose of these rules is to assure that the personal information within a system is used as authorized and that the subject of any information is aware of the information and is able to challenge its presence within the system.

4. Any employee who initiates or otherwise contributes to any disciplinary or other punitive action against any individual who gives evidence of unauthorized use of information contained in the system shall be subject to the disciplinary measures of the District, which can include suspension and/or termination of their employment.

B. Personal Information in a System

1. Any person who is asked to supply personal information for a system shall be advised that they may refuse to supply the requested information unless there is a legal requirement that they provide the information, in which case, they shall be advised of that requirement.

2. The personal information collected, maintained, and used within a system shall be necessary and relevant to the numerous functions of the District as required or authorized by statute, regulation or rule or necessarily inferred from those sources.

3. Personal information which is no longer necessary and relevant to those functions shall be eliminated from a system at the earliest opportunity in accordance with Ohio law.

4. The personal information in a system shall be used in a manner consistent with the purpose of the system and functions of the District.

C. Access to Personal Information

1. Any person who is the subject of the personal information system or his/her legal guardian or representative with a signed authorization from the person shall have the ability to inspect the personal information in the system relating to said person at reasonable business hours by arranging a prior appointment.

2. Copies of personal information documents may be obtained upon the payment of reasonable reproduction costs.

3. Except for those employees who, as part of their job responsibility, have access to a personal information system from time to time, all persons who have access to a personal information system shall be required to note their name and any other information requested by the Superintendent or designee in a manner prescribed by the Superintendent or designee.

4. The provisions of this policy and the existence of a personal information system shall not prohibit the release of public records or the disclosure of personal information in a public record as provided in O.R.C. §149.43, except that the access to any student information shall be limited only to directory information in accordance with O.R.C. §3319.321 and the Family Education Rights and Privacy Act and any rules, regulations or policies adopted by the Board thereunder.

5. The release of personal information to members of the general public which is contained within a public record is not an improper use of personal information.

D. Dispute of Personal Information

1. If any person disputes the accuracy, relevance, timeliness, or completeness of personal information relating to him/her and maintained by the District, said person may request an investigation of the current status of the information by filing a written request with the Superintendent or designee.

2. Upon receipt of the investigation request, the Superintendent or designee shall, within a reasonable time, but not later than 90 days after receipt, conduct a reasonable investigation to determine whether the disputed information is accurate, relevant, timely and complete.

3. The Superintendent or designee shall present the results of the investigation in writing to the Board, with a copy of said report being furnished to the disputant.

4. The Board shall, after receipt of the investigation report, decide what action it intends to take regarding the disputed information and shall notify the disputant of its action.

5. Any personal information that the Board, through this investigation process, cannot verify or finds to be inaccurate shall be deleted from the system.

6. If the disputant is not satisfied with the determination and action of the Board, the disputant shall be permitted to place a brief statement of his/her position within the system consisting of not more than one hundred (100) words.

7. Any statement of dispute shall be included in any subsequent transfer, report, or dissemination of the disputed information and, if the Board or the Superintendent believes the statement of dispute to be frivolous or irrelevant, a statement of that belief may also be included.

8. If any information is deleted because the Board found the information to be unverified or irrelevant, or if a statement of dispute has been filed, upon written request of the disputant, notice of such a deletion or a copy of the disputed statement shall be sent to any person specifically designated by the disputant; however, such person shall be someone who is reasonably aware of the existence of the disputed information.

9. The disputant shall be notified of this right to make such a request in a clear and conspicuous manner such as on the notice of the Board's action.

LEGAL REFS: O.R.C. §1347.05

Adopted: March 22, 2017