

Glenbrook High School District #225

Section A - Protecting the Privacy of Employee Social Security Numbers

<b>Actor</b>	<b>Action</b>
Superintendent, Assistant Superintendents for Human Resources and Business Affairs, and their designees	<p>Identify the approved purposes for collecting SSNs, including:</p> <ol style="list-style-type: none"><li>1. Employment matters, e.g., income reporting to IRS and the IL Dept. of Revenue, tax withholding, FICA, and Medicare.</li><li>2. Verifying enrollment in various benefit programs, e.g., medical benefits, health insurance claims, and veterans' programs.</li><li>3. Filing insurance claims.</li><li>4. Internal verification or administrative purposes.</li><li>5. Other uses authorized and/or required by State law including, without limitation, in the following circumstances (5ILCS 179/10(c):<ol style="list-style-type: none"><li>a. Disclosing SSNs to another governmental entity if the disclosure is necessary for the entity to perform its duties and responsibilities;</li><li>b. Disclosing a SSN pursuant to a court order, warrant, or subpoena; and</li><li>c. Collecting or using SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, or to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act.</li></ol></li></ol> <p>Identify a method for documenting the need and purpose for the SSN before its collection. 5 ILCS 179/10(b).</p> <p>Inform all employees of the District's efforts to protect the privacy of SSNs.</p> <p>Maintain a written list of each staff position that allows or requires access to SSNs.</p> <p>Require that employees who have access to SSNs in the course of performing their duties be trained and instructed to protect the confidentiality of SSNs. 5 ILCS 179/35(a)(2).</p>

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	<p>Direct that only employees who are required by their job responsibilities to use or handle information or documents that contain SSNs have access to such information or documents. 5 ILCS 179/35(a)(3).</p> <p>Require that SSNs requested from an individual be provided in a manner that makes the SSN easily redacted if the record is otherwise required to be released as part of a public records request. 5 ILCS 179/35(a)(4).</p> <p>Require that, when collecting a SSN or upon request a <i>statement of the purpose(s)</i> for which the District is collecting and using the SSN be provided. 5 ILCS 179/35(a)(5).</p> <p>Enforce the requirements in Board policy 6460, Employee Identity Protection, and this procedure.</p> <p>Design and execute a training program on protecting the confidentiality of SSNs for employees who have access to SSNs in the course of performing their duties.</p>
<p>Records Custodian and Head of Information Technology (IT)</p>	<p>Develop guidelines for handling social security numbers in electronic systems. These guidelines should address:</p> <ol style="list-style-type: none"> <li>1. The limited display of SSNs on computer terminals, screens, and reports;</li> <li>2. The security protocol for storing SSNs on a device or system protected by a password or other security system and for accessing SSNs that are included in part of an electronic database;</li> <li>3. The security protocol for deleting SSNs that are stored in electronic documents or databases; and</li> <li>4. Alternate mechanisms for integrating data other than the use of SSNs.</li> </ol>
<p>Assistant Superintendents, Directors, Building Principals, and/or Instructional Supervisors</p>	<p>Require each staff member whose position allows or requires access to SSNs to attend training on protecting the confidentiality of SSNs.</p> <p>Instruct staff members whose position allows or requires access to SSNs to:</p> <ol style="list-style-type: none"> <li>1. Treat SSNs as confidential information.</li> </ol>

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	<p>2. Never publically post or display SSNs or require any individual to verbally disclose his or her SSN.</p> <p>3. Dispose of documents containing SSNs in a secure fashion, such as, by shredding paper documents and by deleting electronic documents as instructed by the IT Department.</p> <p>4. Use SSNs as needed during the execution of their job duties and in accordance with the training and instructions that they received.</p> <p>Instruct staff members whose position does <u>not</u> require access to SSNs to notify a supervisor and/or the IT Department whenever a SSN is found in a document or other material, whether in paper or electronic form.</p>
Freedom of Information Officer	Redact every SSN before allowing public inspection or copying of records responsive to a FOIA request. 5 ILCS 179/15.
Employees	<p>Do not collect, attempt to obtain, use, or disclose another individual's SSN unless directed to do so by an administrator.</p> <p><b>If the employee is in a position that requires access to SSNs:</b> Treat SSNs as confidential information and follow the instructions learned during training.</p> <p><b>If the employee is <u>not</u> in a position that requires access to SSNs:</b> Notify his or her supervisor and/or the IT Department whenever the employee comes across a document or other material, whether in paper or electronic form, that contains a SSN.</p>

Adopted: July 11, 2011