**SOCIAL SECURITY NUMBER PRIVACY**

The District shall protect the confidentiality of social security numbers of staff, students and other individuals it may have in its possession. No person shall knowingly disclose, transfer, or unlawfully use the social security number of an employee, student or other individual from any records of the district.

The Superintendent shall establish procedures to implement this policy.

Social Security Number Privacy Act 454 (MCL 445.81-87)

(School District) Board of Education

Adopted: (Date)

**SOCIAL SECURITY NUMBER PRIVACY PROCEDURES**

All staff and district contractors have a responsibility to keep social security numbers of students, staff, and other individuals that the district has in its possession, secure to the extent practicable. To this end, the following steps shall be followed:

1. Social security numbers should only be collected where required by federal or state law. If a unique personal identifier is needed, a substitute for the social security number shall be used in its place.
2. The District shall periodically review the need for social security numbers in specific instances and eliminate collection where practical and appropriate.
3. Social security numbers shall not be placed on identification badges, time cards, employee rosters, bulletin boards, or any other materials or documents seen widely by others.
4. Documents, materials or computer screens that display social security numbers shall be kept out of public view at all times. Social security numbers shall not be required for a district employee, student, or staff member to gain access to the internet or district network.
5. Documents containing social security numbers shall only be sent where permitted by state law. A social security number may be included in a mailed document where:
	1. It is sent as part of an application or enrollment process initiated by the individual.
	2. It is sent to establish, confirm the status of, service, amend, or terminate an account, contract, employee, or health insurance benefit – or to confirm the accuracy of a social security number of an individual who has an account, contract, policy, or employee or health insurance benefit.
	3. It is contained in a public record and is mailed in compliance with the Freedom of Information Act. Otherwise, the social security number shall be redacted.
	4. It is a copy of a vital record, which was recorded according to law, and is mailed to a person entitled to receive that record.
	5. It is mailed by, or at the request of, an individual whose social security number appears in the document or information of his or her parent or legal guardian.

The number shall not be revealed through the envelope window or be visible from the outside of the envelope.

1. Social security numbers shall not be sent through email.
2. District employees shall not disclose any social security number over the telephone or leave a voice mail message disclosing any social security number. If a social security number must be faxed, the fax message shall be accompanied by a transmittal sheet, which includes the District’s name, a “Confidential Notice” stating that the information included is intended to be privileged and confidential, and that it is only intended for the use of the individual or entity named on the transmittal sheet.
3. Only those persons having a need to know a student, staff or other individual’s social security number to perform their job shall have access to social security numbers.
4. All documents or files that contain social security numbers shall be stored in a physically secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access. When erasing social security numbers from a laptop or desk-top computer, staff shall ensure that the number was erased completely including from the recycle bin.
5. Documents that contain social security numbers shall not be thrown away in the trash, but instead discarded or destroyed only in a manner that protects their confidentiality such as shredding.

Any person who suspects that an improper disclosure of a social security number has been made shall inform the Superintendent or designee.

All current and future employees and contractors shall be given a copy of the above policy and procedure. It shall also be periodically published in the employee newsletter. Any person who fails to comply with this policy and procedure shall be subject to appropriate discipline as determined by the Superintendent or designee.