



## The Charter School Documents Policy

The Cottonwood School recognizes the importance of securing and retaining the Charter School's documents. The Executive Director or designee shall ensure that the Charter School's records are developed, maintained, and disposed of in accordance with law and Board policy.

The purpose of The Cottonwood School Governing Board approving this Charter School Documents Policy is to accomplish the following:

1. Establish the Management of Business and Non-Instructional Operations Documents
2. Identify the Procedures during a Breach of Security
3. Identify the Procedures for The Safe at Home Program

**1. Management of Business and Non-Instructional Operations Documents:** The Executive Director or designee shall consult with the Charter School legal counsel, site administrators, the Charter School information technology staff, personnel department staff, and others as necessary to develop a secure document management system that provides for the storage, retrieval, archiving, and destruction of the Charter School documents, including electronically stored information such as email. This document management system shall be designed to comply with state and federal laws regarding security of records, record retention and destruction, response to "litigation hold" discovery requests, and the recovery of records in the event of a disaster or emergency.

The Executive Director or designee shall ensure the confidentiality of records as required by law and shall establish regulations to safeguard data against damage, loss, or theft.

The Executive Director or designee shall ensure that employees receive information about the Charter School's document management system, including retention and confidentiality requirements and an employee's obligations in the event of a litigation hold established on the advice of legal counsel.

**2. Breach of Security:** If the Charter School discovers or is notified that a breach of security of the Charter School records containing unencrypted personal information has occurred, the Executive Director or designee shall notify every individual whose personal information was, or is reasonably believed to have been, acquired by an unauthorized person. Personal information includes, but is not limited to, a social security number, driver's license or identification card number, medical information, health insurance information, or an account number in combination with an access code or password that would permit access to a financial account. (Civil Code 1798.29)

The Executive Director or designee shall provide the notice in a timely manner either in writing or electronically, unless otherwise provided in law. The notice shall include the material

specified in Civil Code 1798.29, be formatted as required, and be distributed in a timely manner, consistent with the legitimate needs of law enforcement to conduct an uncompromised investigation or any measures necessary to determine the scope of the breach and restore reasonable integrity of the data system. (Civil Code 1798.29)

3. **Safe at Home Program:** The Charter School's public records shall not include the actual addresses of students, parents/guardians, or employees when a substitute address is designated by the Secretary of State pursuant to the Safe at Home program. (Government Code 6206, 6207)

When a substitute address card is provided pursuant to this program, the confidential, actual address may be used only to establish the Charter School residency requirements for enrollment and for school emergency purposes.