

Title:	Learner Privacy Policy		Policy #:	006
Effective Date:	August 2023	Date Adopted/Revised:	October 2022/January 2024	
Policy Approver:	Chief Executive Officer	Policy Owner:	SEED Department Director	
Program & Dept.:	Professional Development Team, Supporting Early Education and Development (SEED)			

Purpose:

The Children’s Cabinet values our client’s privacy and records. This policy describes our policy and efforts to protect the privacy and security of the participants in our child care professional development learning events. The below also establishes who has access to records, when they can be released, and how participants can access their own information.

Policy:

1) Information Systems

It is the policy of The Children’s Cabinet that employees are expected to maintain the security of The Children’s Cabinet information systems. The purpose of this expectation is to maintain the confidentiality of learner information, and to prevent unauthorized use of systems.

- Employees are expected to utilize strong passwords for all computerized systems and change those passwords within IT designated timeframes.
- Employees are expected to “log” off computer systems at the end of their work at a specific workstation and at the end of every workday.
- Employees are expected to “lock” computer systems whenever they step away from their workstation. This includes but is not limited to breaks, lunches and meetings.

Passwords or codes are used by employees to prevent unauthorized access by other employees and the public, but should not be construed as creating an expectation of privacy for the employee who uses the password or code.

The sharing of passwords/codes with anyone other than Information Technology Staff is not permissible and is considered a major breach of security and ethics.

Employees are not permitted to allow access to any system by clients, co-workers or the general public by logging onto a system under their own user name or pass code. Employees who do so will be held responsible for any activity conducted under their own user name or pass code.

Unauthorized access to another employee’s files or use of Cabinet systems to gain unauthorized access to confidential information is a major breach of security and ethics.

a) Data Retention

- The IT Department has procedures in place to backup and retain data in Cabinet owned information systems. Employees are expected to store all business-related documents and files in secure network folders. Files and documents stored on an individual computer are not routinely backed up and cannot be restored.



- Employees are expected to maintain their assigned network folders. This includes saving files in proper network folders, deleting outdated files from network folders and maintaining subfolder structures so that others may find needed files.
- Children's Cabinet data is retained for a minimum of three years. Employees are discouraged from saving personal information or documents in network folders, as these files will be retained and are subject to audit by external funding sources.
- The use of removable storage devices such as memory keys in conjunction with Children's Cabinet computing equipment must receive prior approval from the IT Department. Removable storage devices may not be used for removal or copying of Children's Cabinet proprietary information, including but not limited to files, documents and email.

2) Client/Learner Records

Physical copies of learner records with Personal Identifiable Information, if they exist, are stored in the learning event file, and kept in a locked cabinet, behind a locked door of The Children's Cabinet Professional Development Program Assistant office for up two years.

- Between two and seven years, hard copy learner records are stored in a locked offsite storage unit that is monitored by security cameras and employee access codes.
- Beyond seven years, learner records are disposed of via a secure document shredding service.

3) Learner Access and Records Request

Any person participating in child care professional development learning events may submit a written request of information to The Children's Cabinet Supporting Early Education and Development (SEED) Professional Development team program assistant for a copy of records associated with their person. All individuals submitting a records release request must be prepared to provide identification documentation.

Please Direct Learner Record Requests to:

Professional Development Team

Attn: Program Assistant

cabtraining2@childrencabinet.org