Policy Number		Policy Title	
6007.00		Personally Identifiable Information (PII) Policy	
Contacts and Dates			
Responsible Office		**Policy Owner**	
Spelman Technology Services (STS)		VP/CIO	
Effective Date	**Last Updated**		**Next Review**
10/19/2009	08/08/2018		08/08/2019
Policy Description			
Policy			

Purpose

Spelman College creates, collects, maintains, uses, and transmits personally identifiable information relating to individuals associated with the College including, but not limited to, students, alumnae, faculty, administrators, staff, and service employees.   To maximize trust and integrity, the College is committed to protecting personally identifiable information (PII) against inappropriate access and use in compliance with applicable laws and regulations.

This policy applies to all members of the College community, including all full- and part-time employees, faculty, students and other individuals such as: contractors, consultants, other agents of the community, alumnae, and affiliates that are associated with the College or whose work gives them custodial responsibilities for PII.

Members of the College community shall employ reasonable and appropriate administrative, technical, and physical safeguards to protect the integrity, confidentiality, and security of all PII, irrespective of its source or ownership or the medium used to store it. All individuals who dispense, receive, and store PII have responsibilities to safeguard it. In adopting this policy, the College is guided by the following objectives:

- To enhance individual privacy for members of the College community through the secure handling of PII and personal identifiers;
- To ensure that all members of the College community understand their obligations and individual responsibilities under this policy by providing appropriate training that will permit the College community to comply with both the letter and the spirit of all applicable privacy legislation;
- To increase security and management of Social Security numbers (SSNs) by:
    o instilling broad awareness of the confidential nature of the SSNs;
    o establishing a consistent policy about the use of SSNs throughout the College; and
    o ensuring that access to SSNs for the purpose of conducting College business is granted only to the extent necessary to accomplish a given task or purpose.
- To use throughout the College, a unique Spelman College ID (SCID) that serves as the primary identification element for persons associated with Spelman College, reducing reliance on the SSN for identification purposes.

Definitions

Personally Identifiable Information (PII)
Information which can be used to distinguish or trace an individual's identity, such as their name, Social Security number, or biometric records, alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual (e.g., date and place of birth, mother's maiden name).

Minimum Necessary

The standard that defines that the least information and fewest people should be involved to satisfactorily perform a particular function. Users who violate this policy may be denied access to College information technology resources and may be subject to other disciplinary action, both within and outside of the College.

Violations

Will normally be handled through the College disciplinary procedures applicable to the relevant user. For example, alleged violations by students will normally be investigated, and any penalties or other discipline will normally be imposed by the Office of Student Affairs. However, the College may temporarily suspend or block access to an account, prior to the initiation or completion of such procedures, when it reasonably appears necessary to do so in order to protect the integrity, security, or functionality of College or other computing resources or to protect the College from liability. The College may also refer suspected violations of applicable law to appropriate law enforcement agencies.

To Whom Policy Applies

To whom and/or what the policy applies; lists groups who must know and adhere to the policy

☒ All College (Faculty, Staff, Students, Trustees, Contractors [unless otherwise negotiated])

☐ Divisional
☐ Unit/Department Specific

Spelman College Policy(ies)

N/A

External Regulations (if applicable)

Family Education Rights and Privacy Act (FERPA)
Higher Education Compliance Alliance
Higher Education Compliance Alliance: Privacy/Student Records
Higher Education Compliance Alliance: Information Technology
The Privacy Act of 1974 (5 U.S.C. 552a)
Department of Justice guidance on the Privacy Act
Clinger-Cohen Act of 1996, also known as the Information Technology Management Reform Act)

Tags

PII, Personally Identifiable Information, SSN

Monitoring

Responsibility for Maintenance and Access Control Access to electronic and physical repositories containing PII will be controlled based upon reasonable and appropriate administrative, physical, technical, and organizational safeguards. Individuals who inadvertently gain access to a file or database that contains PII for which they have not been authorized shall report it immediately to the Vice President/Chief Information Officer and send an email to infosecurity@spelman.edu.

Access to PII data in Spelman's Banner system is requested by submitting a Banner Account Request form. The form is approved by the departmental manager and submitted to IT. Once approved by the manager, the requester must review and acknowledge the PII Policy before access is granted.

Exceptions/Exclusions (if applicable)

Background and History

Administrator Access (Policy Owner)

Review, Approval, and Change History: Policy is required to be reviewed annually

Date (MM-DD-YYYY)	Reviewed by Policy Owner	Brief Description of Change (if applicable)	Change/Update Approved by (title, not name)
04-16-2018	☒	Changed text due to outdated or inconsistent information	VP/CIO
	☐		
	☐		
	☐		