



## 3004.1 Confidential Documents and Records Disposal Policy

**Effective Date: May 8, 2020**

**Approved by: Board of Directors**

### **Policy:**

JCS, Inc. generates, receives, and stores many documents and records of a confidential nature. If confidential documents and records are not securely maintained and periodically destroyed/shredded, there is a potential danger that individuals' confidential information can be obtained and/or misused. It is the purpose of this policy, therefore, to specify the methods and responsibilities for the secure storage and destruction/shredding of confidential documents and records.

### **Definitions:**

Confidential documents and records are those containing any or all of the following information:

- Anything containing a social security number.
- Anything containing a name and date of birth.
- Anything containing a credit card number.
- Academic information including, but not limited to, test scores and transcripts, where individuals are identified by name and/or social security number.
- Other information regarding students including, but not limited to, records of disciplinary proceedings.
- Medical records.
- Any other information considered confidential in accordance with the provisions of the Federal Educational Right to Privacy Act and applicable state statutes and education code.

### **Document Storage and Shredding Procedures:**

1. Collect and store all documents and records containing confidential information, as defined above, in a secure location. A secure location shall be any storage area that can be securely locked, is supervised throughout the business day, and which is not readily accessible to persons not authorized to move about freely within the facility.
2. At the discretion of the Executive Director, confidential documents and records may be destroyed by shredding by designated individuals, without first being securely stored, if:
  - a. The records/documents have met the retention requirements set forth by the School and any applicable statutes or regulations and they are not involved in any on-going audit, litigation or academic or administrative process and/or if the document(s) or record(s) are no longer needed after having been reviewed, read or otherwise processed within a one-week period of time.
3. Confidential documents and records shall be destroyed by shredding, provided all retention requirements, as discussed above, have been met.

- a. Copies of confidential documents and records supplied to administrators, teachers, or other staff for administrative purposes should be shredded after they have been reviewed, read or otherwise processed.
  - b. Copies of student files and records for withdrawn students, maintained by administrators, teachers, or other staff for the purposes of documenting student attendance, conduct, work samples, academic growth or other learning period/yearly documentation, should be shredded at the end of the school year after ensuring that all original documents and records have been forwarded to the main administrative office.
4. Confidential records found by any employee in a location other than where they are to be properly stored should be brought to the attention of the Executive Director for further action consistent with this policy.

Original Policy 09/12/06  
Revised Policy 09/08/17  
Revised Policy 05/08/2020