

Scholar Academy
Policy: Student Data Privacy and Security Policy
Adopted: June 21, 2017

Purpose

Scholar Academy (the “School”) is responsible for protecting the privacy of student data and ensuring data security. The purpose of this policy is to describe how the School will perform this responsibility in compliance with state and federal law.

Policy

The School will comply with state and federal laws regarding student data privacy and security, including but not limited to the Utah Student Data Protection Act, Utah Family Educational Rights and Privacy Act, Utah Administrative Code Rule R277-487 Public School Data Confidentiality and Disclosure, and the federal Family Educational Rights and Privacy Act.

The Utah Student Data Protection Act requires the School to, among other things:

- (1) Adopt policies to protect student data in accordance with the Act;
- (2) Designate a student data manager;
- (3) Create, maintain, and publish a data governance plan;
- (4) Create, maintain, and publish a metadata dictionary;
- (5) Establish an external research review process for a request for data for the purpose of external research or evaluation;
- (6) Distribute and publish a student data disclosure statement; and
- (7) Require third-party contractors that receive student data from the School to enter into a contract with the School concerning, among other things, the third-party contractor’s collection, use, storage, and sharing of the student data.

Student Data Manager

The School hereby designates the Principal as the School’s Student Data Manager. The Principal shall fulfill the responsibilities of a student data manager described in Utah Code Ann. § 53A-1-1409. When appropriate, the Principal may delegate such responsibilities to another individual.

Data Governance Plan

The Principal shall establish an administrative Data Governance Plan that complies with the requirements of the Utah Student Data Protection Act and rules made by the Utah State Board of Education. The Data Governance Plan shall encompass the full life cycle of student data, from acquisition, to use, to disposal, and shall, among other things:

- (1) Incorporate reasonable data industry best practices to maintain and protect student data and other education-related data;
- (2) Provide for necessary technical assistance, training, support, and auditing;
- (3) Describe the process the School will follow in connection with sharing student data with third-parties, including appropriate third-party contractors;
- (4) Describe the process for an adult student or parent to request that data be expunged;
- (5) Include the School's external research review process for a request for data for the purpose of external research or evaluation; and
- (6) Describe actions the School will take to prevent data breaches as well as the process the School will follow in the event of a data breach.

The Data Governance Plan shall work in conjunction with this policy, the School's metadata dictionary, any other School policy or administrative procedure or plan concerning student data privacy and security.

The Data Governance Plan shall be published as required by the Utah Student Data Protection Act and rules made by the Utah State Board of Education.

Metadata Dictionary

The Principal shall ensure that the School creates, maintains, and publishes a metadata dictionary in accordance with the Utah Student Data Protection Act and rules made by the Utah State Board of Education.

Training

The School shall provide appropriate student data privacy training to its employees, aides, and volunteers who are authorized by the School to have access to education records as defined in the Family Educational Rights and Privacy Act.

Signature:



June 21, 2017

Sandra Larsen, Board President

Date