

Glens Falls Common School District: Parents' Bill of Rights for Data Privacy and Security

The Glens Falls Common School District is committed to ensuring student privacy in accordance with all local, state, federal regulations, and district policies. Therefore, in accordance with New York State Education Law, Section 2-d, the Glens Falls Common School District provides the following Parents' Bill of Rights for Data Privacy and Security:

- A student's personally identifiable information cannot be sold or released for any commercial purposes.
- In accordance with FERPA and Section 2-d of the New York State Education Law, parents have the right to inspect and review the complete contents of their child's education record;
- State and federal laws protect the confidentiality of personally identifiable information, and safeguards associated with industry standards and best practices, including but not limited to, encryption, firewalls and password protection, must be in place when data is stored or transferred;
- A complete list of all student data elements collected by the State is available for public review at http://www.p12.nysed.gov/irs/sirs/2011-12/2011-12SIRSGuidance/NEWER/2013-14SIRSMannual9-1_20131107.pdf or by writing to the Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234.
- Parents have the right to submit complaints about possible breaches of student data. Any such complaint must be submitted, in writing, to: Brian George, Superintendent, Glens Falls Common School District, 120 Lawrence Street, Glens Falls, NY 12801 or 518-792-3231.
- Complaints to SED should be directed to: Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234; the e-mail address is cpo@mail.nysed.gov. SED's complaint process is under development and will be established through regulations to be proposed by NYSED's Chief Privacy Officer, who has not yet been appointed.

Supplemental Information Regarding Third-Party Contractors

In the course of complying with its obligations under the law and providing educational services to District residents, the Glens Falls Common School District has entered into agreements with certain third-party contractors. Pursuant to such agreements, third-party contractors may have access to "student data" and/or "teacher or principal data," as those terms are defined by law.

Each contract the District enters into with a third party contractor where the third party contractor receives student data or teacher or principal data will include the following information:

- 1) The exclusive purposes for which the student data or teacher or principal data will be used;
- 2) How the third party contractor will ensure that the subcontractors, persons or entities that the third party contractor will share the student data or teacher or principal data with, if any, will abide by data protection and security requirements;
- 3) When the agreement expires and what happens to the student data or teacher or principal data upon expiration of the agreement;
- 4) If and how a parent, student, eligible student, teacher or principal may challenge the accuracy of the student data or teacher or principal data that is collected; and

5) Where the student data or teacher or principal data will be stored (described in such a manner as to protect data security), and the security protections taken to ensure such data will be protected, including whether such data will be encrypted.

Additional Student Data Privacy Information

This bill of rights is subject to change based on regulations of the commissioner of education and the SED chief privacy officer, as well as emerging guidance documents from SED. For example, these changes/additions will include requirements for districts to share information about third-party contractors that have access to student data, including:

- How the student, teacher or principal data will be used;
- How the third-party contractors (and any subcontractors/ others with access to the data) will abide by data protection and security requirements;
- What will happen to data when agreements with third-party contractors expire;
- If and how parents, eligible students, teachers or principals may challenge the accuracy of data that is collected; and
- Where data will be stored to ensure security and the security precautions taken to ensure the data is protected, including whether the data will be encrypted.