

Personnel - All EmployeesShredding Consumer Reports

It is the policy of Arnold Public Schools to take reasonable measures to protect against unauthorized access to consumer information from consumer reports. A consumer report includes criminal background checks performed on applicants or employees by a third party. It does not include criminal checks performed by school staff.

Reasonable measures to protect against unauthorized access to or use of consumer information in connection with its disposal include the following examples. These examples are illustrative only and are not exclusive or exhaustive methods for complying with this directive.

- (1)        Shredding of papers containing consumer information so that the information cannot practicably be read or reconstructed. Burning or pulverising such papers are also options where appropriate.
- (2)        Destruction or erasure of electronic media containing consumer information so that the information cannot practicably be read or reconstructed.
- (3)        After due diligence, entering into and monitoring compliance with a contract with another party engaged in the business of record destruction to dispose of material in a manner consistent with this directive.

This policy does not require that the consumer reports information be disposed of; rather, it specifies the action to be taken whenever such disposal occurs. Questions regarding the disposal of consumer reports information should be directed to the Superintendent or the Superintendent's designee.

Legal Reference:        FTC Rule on Disposal of Consumer Report Information and Records, 16 CFR Part 682

Date of Adoption:        August 12, 2014

