

St. Mary's School for the Deaf ("SMSD") Data Security and Privacy Policy

Purpose: This Policy is designed to support SMSD's efforts to protect and maintain the confidentiality, integrity and availability of its data, data systems and information technology resources, including specifically student data and teacher data, as those terms are defined in N.Y. Education Law Section 2-d.

Application: This policy applies to SMSD's employees, interns, volunteers, consultants and third-parties who receive or have access to SMSD's data and/or data systems.

This Policy encompasses all of SMSD's systems, automated and manual, including systems managed or hosted by third parties on behalf of the School and it addresses all information, regardless of the form or format, which is created or used in support of the activities of the school.

Data Protection Officer: SMSD appoints Richard Szafranek as its Data Protection Officer. The Data Protection Officer is responsible for oversight of the implementation of this Policy consistent with SMSD's security program.

Standard: SMSD will adopt reasonable administrative, technical and physical safeguards based upon its periodic assessment of corresponding risks and consistent with the National Institute of Standards and Technology's Cybersecurity Framework v. 1.1. In maintaining its security program, it is SMSD's policy that every use and disclosure of personally identifiable information by SMSD shall benefit students and SMSD, including by improving academic achievement, empowering parents and students with information and/or advancing efficient and effective school operations. Further, personally identifiable information shall not be included in public reports or other public documents.

Agreements with Third Party Contractors: When SMSD enters into new contracts with third-party contractors (or renews existing contracts) where student, teacher or principal personally identifiable information is shared, SMSD will require the contractor to maintain a data security and privacy plan that complies with the requirements of NY Education Law Section 2-d. Further, SMSD's Parents Bill of Rights will be appended to any such contract.

Complaints Pertaining to Unauthorized Release of Personally Identifiable Information: Parents, eligible students, and staff should bring any complaints regarding unauthorized releases of student, teacher or principal personally identifiable information to the attention of SMSD's Data Protection Officer. Complaints must be made in writing and must be submitted to Richard Szafranek, Data Protection Officer, 2253 Main St., Buffalo, NY 14214.

Complaints may also be submitted to the Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, NY 12234; by email to privacy@nysed.gov; or by telephone at 518-474-0937.

Inspection of Educational Records: Parents and eligible students have the right to request to inspect and review a student's education record by making a written request directly to SMSD.

Such written requests are to be made only by authorized individuals and SMSD may verify the identity of parents or eligible students who submit the requests and their authority to do so. Written inspection requests should be submitted to Richard Szafranek, Data Protection Officer, 2253 Main St., Buffalo, NY 14214.

Annual Data Privacy and Security Training: SMSD will provide annual data privacy and security awareness training to include, without limitation, training on applicable laws and regulations pertaining to the protection of personally identifiable information.

Last Updated: September 2023