Sample Privacy and Security Policies

Tips and Guidance

Colorado Department of Education

Per Colorado’s Student Data Transparency and Security Act, CDE is required to provide Local Education Providers (charter schools, districts, BOCES, etc.) with sample privacy and security policies. The [sample policies are located here](http://www.cde.state.co.us/dataprivacyandsecurity/sampleitpolicies) and can be used by LEPs as they develop their own policies as required by the law.

Sample Policies

Where can I learn more?

**Resource information**

* The [Student Data Transparency and Security Act (PDF)](http://www.cde.state.co.us/dataprivacyandsecurity/crs22-16-101)
* [CDE’s Law Resources page](http://www.cde.state.co.us/dataprivacyandsecurity/newprivacylawresources)
* [Sample LEP Policies page](http://www.cde.state.co.us/dataprivacyandsecurity/sampleitpolicies)

FEBRUARY 2017

* Brackets ([]) indicate placeholders for LEP-specific roles, terms, or departments
* These policies must reflect accurate and current LEP processes, so each item in the policies should be reviewed and corrected if needed
* The policies contain Guidance Notes with other helpful instructions

Terms

* All major terms used within a policy should be defined according to your other policies, legal definitions, etc.
* If a term is defined, you need to capitalize it throughout the document
* You can define terms in the policy itself, in a glossary document, or in some other way
* Use the terms consistently throughout all policies

Processes

* Policies should include distinct processes, be easy to follow, and repeatable
* For some policies, like Data Breach Policies, tabletop exercises or walkthroughs are important so that everyone understands their roles
* If you have complex processes or processes that may change quickly or often, it would be best to create a procedure document that lists the processes in detail and will not require policy revisions

Grammar and Formatting

* Formatting should be consistent throughout the policy and match other policies and procedures documents
  + Grammar and punctuation should also be consistent across and within policies (for example, [oxford commas](https://www.grammarly.com/blog/what-is-the-oxford-comma-and-why-do-people-care-so-much-about-it/) or periods at the end of bulleted lists)

Lists

* It is important to use a logical and consistent list format so that you can easily find items in a policy
* A general rule of thumb for numbering is to alternate between numbers and letters and then alternate types of numbers and types of letters
  + - For example, I, A, 1, a, i (Roman numeral, capital letter, Arabic numeral, lower case letter, lower case Roman numeral)

Versions

* Generally, policies use a numbering convention similar to software version control (for example, 1.0, 1.2, 2.0, etc.)
* Numbers to the right of the decimal advance for minor changes and numbers to the left advance with major changes

If you have any questions about the policies or CDE’s privacy and security programs, contact us.

Marcia Bohannon - [Bohannon\_m@cde.state.co.us](mailto:Bohannon_m@cde.state.co.us), Jill Stacey - [Stacey\_j@cde.state.co.us](mailto:Stacey_j@cde.state.co.us), or Corey Kispert – [Kispert\_c@cde.state.co.us](mailto:Kispert_c@cde.state.co.us).