

Dorothy Hull Library
Windsor Charter Township

Social Security Number Privacy Policy

1. Purpose

In compliance with Michigan's Social Security Number Privacy Act (P.A. 454 of 2004) the Dorothy Hull Library will protect, to the extent practicable, the confidentiality of social security numbers obtained in the ordinary course of library business from employees, patrons, contractors, etc. No person shall knowingly obtain, store, transfer, use, disclose or dispose of a Social Security number except in accordance with Act 454 of 2004 and this policy. For the purpose of this policy, SSN refers to the use of more than 4 sequential numbers of an individual's social security number.

2. Procedures

Obtaining Social Security Numbers

The Dorothy Hull Library will only collect SSN when required by federal or state law or as otherwise permitted by federal or state law for legitimate reasons consistent with this Policy. Such reasons include, but are not limited to:

- Pre-employment background checks,
- Verifying applicant eligibility for employment,
- Tax reporting purposes and/or
- Enrollment in employee benefits plans.

Access to Social Security Numbers

Only Library and Windsor Township personnel who have legitimate business reasons to know will have access to records containing Social Security Numbers. The Library Director shall determine who within the Library and Township personnel have a legitimate reason to have access. All individuals having access must take appropriate steps to secure such records when not in immediate use.

Protection of Social Security Numbers

The Dorothy Hull Library will not:

- Publicly display more than 4 sequential numbers of an individual's complete social security number. This includes displays on identification cards, badges, time sheets, etc. Documents, materials or computer screens that display all or more than four sequential digits of a SSN shall be kept out of public view at all times.
- Use the complete or more than four sequential digits of the SSN as the primary account number for any employee.
- Require an employee to use or transmit the SSN over the Internet or computer system/network unless the connection is secure or encrypted, or a password or other authentication devise is required to gain access.
- Include the SSN on or in any document sent to an individual if the numbers can be revealed through the envelope window or otherwise be visible from outside the envelope or package.

- Unlawfully disclose social security numbers.

Release of Documents under the Freedom of Information Act (FOIA)

Where all or more than four sequential numbers of a SSN are contained in a document subject to release under FOIA, the SSN shall be redacted or otherwise made unreadable before the document or its copy is disclosed.

Storage and Disposal of Social Security Numbers

All documents containing a SSN shall be stored in a physically secure manner. Numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

Documents containing social security numbers will be retained in accordance with state and federal laws. When documents containing an SSN may be destroyed, such disposal shall be done in a manner that protects the confidentiality of the number (such as shredding).

3. Unauthorized Use or Disclosure of Social Security Numbers

The Dorothy Hull Library shall take reasonable measures to enforce this policy and to correct and prevent the reoccurrence of any known violations. Any employee, who knowingly obtains, uses or discloses a Social Security number for unlawful purposes or contrary to this policy shall be subject to discipline up and including discharge.

Additionally, certain violations of MI Act 454 of 2004 carry criminal and/or civil sanctions. The Library will cooperate with appropriate law enforcement or administrative agencies on any investigation regarding possible unlawful use or disclosure SSN that may involve the Library.

Adopted January 9, 2006, amended 3/15/2018