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B-3a PROCEDURE Records Retention – Information Protection Process

PROTECTION OF INFORMATION

The SCC Human Resource Office (HRO) limits access to and unauthorized disclosure of collected sensitive background information of personnel hired by SCC for purposes of determining the adequacy of Trustworthiness and Reliability (T&R) as well as "unescorted access" to Category 2 radioactive material stored and used at the SCC Milford Campus.

This information referenced above includes background investigations, either on-going or finalized, as well as results conducted by either SCC or external agencies such as the Nebraska Department of Health and Human Services (NE-DHHS), Federal Bureau of Investigation (FBI), Nuclear Regulatory Commission (NRC)

This information would also include any sensitive information "lists" or "access authorization" procedures that may be stored at the SCC HRO.

All hardcopy (printed) relevant information will be stored in locked file cabinets located either on the 5th floor of the HRO at the "Jack Huck Continuing Education Center" at 301 S 68th St. Place, Lincoln, NE or housed within the HRO locked records storage facility (basement) in lock file cabinets at the same address as listed above. Only employees working for the HRO will have file cabinet keys that allow access to files at either location. When it is necessary for HRO personnel to view sensitive information it should be done at a discreet location with provisions so that no one other than the HRO personnel may see the contents of the information preventing "over-the-shoulder" viewing by non-approved personnel. Folders and all loose material containing sensitive information will be placed back in locked storage after use.

Digital Media – Sensitive information contained as "digital format" shall be limited to SCC network server access only. Only HRO personnel shall have access to the sensitive information. Servers access shall be login and password protected. Any digitally sensitive information that requires deletion shall be deleted and then the computer "recycle bin" emptied for that specific network drive as well.

Destruction of Documents – All paper documents containing "sensitive information" to be discarded will be destroyed by shredding in a paper shredder. Shredded documents will then be placed in locked waste bins located in the basement HRO storage facility. The contents of the bins will conveyed by an SCC employee witness directly to the disposal service vehicle for removal, Information on computers in digital format to be discarded will be both deleted and the files located in the computer's "recycle bin" deleted as well. This double deletion process will help insure destruction of files in the Windows operating environment.

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Document Removal Status – The Reviewing Official (R.O.) will conduct periodic reviews, as necessary, of documents that may be removed from "sensitive information" categorization due to becoming obsolete or that do not merit possessing "sensitive information" status. These documents will either be destroyed using approved destruction and disposal method or simply downgraded to a non-sensitive status.

Protection of Sensitive Information During Transit – If information is required to be transported to a location remote from the building. The sensitive information will be protected during transportation by maintaining all documents and digital media in a storage device such as a briefcase or other method of containment. This information will be kept with the HRO person at all times during transit. If brief evacuation of a vehicle is necessary, the information will remain in the storage device and the vehicle locked and secured from entry.

Development of T&R information – Applicants and employees for positions which are impacted by the T&R requirement will be subjected to the following reviews and processes by the Human Resources Office. Applicants who are selected for a T&R covered position will be subject to the review at the time of offer, employees in T&R positions will be reviewed every seven (7) years.

- 1. Online Criminal & Sex Offender review conducted by the Human Resources Office.
- 2. Complete Criminal Background Check for a minimum of the past seven (7) years (where possible) completed by the College's CBC provider.
- 3. State of Nebraska Health and Human Services Adult & Youth Abuse Registry Check.
- 4. Prior employment verification for new employees.
- 5. Verification of required education for the position.
- 6. Review of Performance Evaluations for current employees.

The Vice President for Human Resources will provide a written letter of T&R following completion of the above steps to the Program Chair/Dean of the T&R division at the College. A copy will be maintained in the employee's Personnel File by Human Resources.

Additional FBI Fingerprinting and CBC results will be included as provided by the T&R division.

Related Policy: B-4, A-7a (HR/PR)

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Tags: information protection, records retention

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