

Policy for Ensuring the Security of Not Public Data

Legal Requirement

The adoption of this policy by the City of Watertown satisfies the requirement in Minnesota Statutes, Section 13.05, Subd. 5, to establish procedures ensuring appropriate access to not public data. By incorporating employee access to not public data in City of Watertown's Data Inventory (required by Minnesota Statutes, Section 13.025, Subd. 1) in the individual employee's position description, or both, City of Watertown's policy limits access to not public data to employees whose work assignment reasonably requires access.

Please direct all questions regarding this policy to the City of Watertown's Data Practices Compliance Official:

Jim Bart

jbart@ci.watertown.mn.us

Phone: 952-955-2687

Fax: 952-955-2695

309 Lewis Ave. South
Watertown, MN 55388

Procedures Implementing This Policy

Data Inventory

Under the requirement in Minnesota Statutes, Section 13.025, Subd. 1, the City of Watertown has prepared a Data Inventory which identifies and describes all not public data on individuals maintained by the City of Watertown. To comply with the requirement in Section 13.05, Subd. 5, the City of Watertown has modified its Data Inventory to represent the employees who have access to not public data. The City of Watertown Responsible Authority, the Data Practices Compliance Official, City Administrator and Designee may have access to all not public data for specified duties. Any access to not public data will be strictly limited to the data necessary to complete the work assignment.

Employee Position Descriptions

Position descriptions may contain provisions identifying any not public data accessible to the employee when a work assignment reasonably requires access.

Data Sharing with Authorized Entities or Individuals

State or Federal law may authorize the sharing of not public data in specific circumstances. Not public data may be shared with another entity if a federal or state law allows or mandates it. Individuals will have notice of any sharing in applicable Tennessee warnings (see Minnesota Statutes, Section 13.04) or the individual's informed consent will be obtained. Any sharing of not public data will be strictly limited to the data necessary or required to comply with the applicable law.

Ensuring That Not Public Data is Secure

The City of Watertown will ensure that not public data is secure by keeping it locked in file cabinets within the City Administrator's Office. Other procedures include shredding not public data documents before disposing of them. Following the City's approved record retention schedule for disposing of documents.

Penalties for Unlawfully Accessing Not Public Data

The City of Watertown will utilize the penalties for unlawful access to not public data as provided for in Minnesota Statutes, Section 13.09, if necessary. Penalties include suspension, dismissal or referring the matter to the appropriate prosecutorial authority.

Data on Individuals Maintained by the City of Watertown

This document identifies the name, title and address of the Responsible Authority for the City of Watertown and describes private or confidential data on individuals maintained by the City of Watertown (Minnesota Statute 13.05 and Minnesota Rules 1205.1200)

This document is also part of the City of Watertown's procedures for ensuring that not public data are only accessible to individuals whose work assignment reasonably requires access (Minnesota Statute 13.05, Subd. 5). The City of Watertown Responsible Authority, the Data Practices Compliance Official, City Administrator and Designee will have access to all not public data on an as needed basis as part of a specific work assignment.

The City of Watertown's Responsible Authority is:
Shane Fineran, City Administrator
sfineran@ci.watertown.mn.us
309 Lewis Ave. South
Watertown, MN 55388

Direct all questions about this document to the City of Watertown's Data Practices Compliance Official:

Jim Bart
jbart@ci.watertown.mn.us
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Fax: 952-955-2695
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Watertown, MN 55388

Data Maintained by City of Watertown

The following data are maintained by the City of Watertown and kept in locked cabinets
In the City Administrator's Office and can be accessed by certain employees
on an as needed basis as part of specific work assignments

Name of Record	Description	Classified	Statute
Benefit Enrollments	Employees' medical, dental, etc. election forms	Private	MS 13.43
Drug/Alcohol Tests	Test results and any accompanying information	Public/Private	MS 13.43
Family Medical Leave Documents	Retained in employee medical file	Private	MS 13.43
Grievance Files	Formal written employee grievance and/or Complaint filed.	Public/Private	MS 13.43
Employee I-9 Form	Verifies status of citizenship or naturalization	Private	MS 13.43
Personnel Files	Relevant records on each employee	Public/Private	MS 13.43
Recruitment Files	Records relating to posting, recruitment, selection	Public/Private	MS 13.43
Reprimands	Disciplinary Action	Public/Private	MS 13.43
Unemployment Claims/Compensation		Public/Private	MS 13.43
Medical Records	Information concerning health status	Public/Private	MS 13.43
OSHA Reports	Incident reports and annual summary	Public/Private	MS 13.43