



Michigan Amateur Hockey Association Policy & Guidelines

MAHA Privacy Policy Relating to Social Security Numbers and Other Sensitive Data

Section: Administration

Approved: 11/5/2010

It is the policy of the Michigan Amateur Hockey Association (MAHA) that it will not allow participation in its programs any volunteer or employee who has routine access to children (anyone under the age of majority) who refuses to consent to be screened by the MAHA before he/she is allowed routine access to children in MAHA's programs. The MAHA, in the course of accessing the requisite criminal history records relating to a coach, assistant coach, manager, referee, instructor, minor official and officers of all associations may collect and maintain social security numbers and/or other sensitive data. The MAHA may also obtain other sensitive data in the ordinary course of its business and as required by law. The MAHA will handle social security numbers and other sensitive data with a high degree of security and confidentiality.

In an effort to protect the privacy rights of individuals that provide social security numbers and/or sensitive data to the MAHA, the MAHA will:

- ensure, to the extent practicable, the confidentiality of social security numbers and other sensitive data;
- not unlawfully disclose an individual's social security number or other sensitive data;
- not place social security numbers or driver's license numbers on identification badges;
- limit access to records and record systems containing social security numbers or other sensitive data to those who have a business related reason to know this information; and
- dispose of records containing sensitive data, when necessary, in a responsible manner that minimizes risk that the sensitive data can be accessed inappropriately.

Social security numbers will not be publicly displayed, used as an account number or identifier for an individual; or used, transmitted, or stored on records that are not encrypted or secure. The MAHA will physically destroy documents that contain social security numbers but need to be discarded by shredding or other secure fashion. When no longer needed, social security numbers stored in a computer database will be deleted from all programs pursuant to techniques and standards commonly used for such purposes.

The MAHA Executive Board, the Abuse Prevention Committee and the MAHA legal counsel have the right to access records containing sensitive data. Authorization to access sensitive data will be based on appropriateness to the authorized user's role and the intended use. This policy applies to the records or record systems purchased, developed, and maintained by the MAHA.

It is the MAHA's intention to comply with this policy and with all applicable laws regarding the privacy of social security numbers, including MCL 445.81 et. seq. Corrective action will be taken in the event of intentional violations of this policy. Such action may include the amendment of a process, practice, record or record system to better protect the confidentiality of social security numbers or other sensitive data or, if appropriate, disciplinary action. Loss or theft of social security numbers or other sensitive data will be promptly reported to law enforcement and/or the appropriate data steward for responsive action.

Definitions

Authorized User

An authorized user is anyone determined by the MAHA Executive Board to carry out the background screening process or any other process that utilizes sensitive data required under the MAHA Rules and Regulations.

Records

A record is any document, file, computer program, database, image, recording, or other means of expressing fixed information.

Record Systems

Record Systems are manners of storing, disseminating, or organizing records and include computers, on-line storage, telephone lines, voice mail, fax machines, and filing cabinets.

Sensitive Data

Sensitive Data refers to any data whose unauthorized disclosure may have a significant adverse effect on the MAHA's reputation, resources, services, or individuals. Data protected under federal or state regulations or due to proprietary, ethical, or privacy considerations may be classified as sensitive. Social Security numbers and driver's license numbers are considered sensitive data.