

City of St. Paul Park

# Policy for Ensuring the Security of Not Public Data

Minnesota Statute, Section 13.05, subd. 5 require all government entities establish appropriate security safeguards for all records containing data on individuals. The adoption of this policy by the City of St. Paul park satisfies this requirement.

Adopted 09/06/2016

## Procedures implementing this policy

### 1. Data Inventory

Under the requirement in Minnesota Statutes, section 13.025, subd. 1, the City of St. Paul Park has prepared a Data Inventory which identifies and describes all not public data on individuals maintained by the City and the employees who have access to not public data.

In event of a temporary duty as assigned by a manager or supervisor, an employee may access certain not public data, for as long as the work is assigned to the employee.

In addition to the employees listed in the Data Inventory, the Responsible Authority, the Data Practices Compliance Official, City Administrator, and the City Attorney may have access to *all* not public data maintained by the City if necessary for specified duties. Any access to not public data will be strictly limited to the data necessary to complete the work assignment.

### 2. Employee Job Descriptions

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

#### ***“Access to Not Public Data***

*The employee may encounter not public data in the course of their duties. Any access to not public data should be strictly limited to accessing the data that are necessary to fulfill the employment responsibility. While data are being accessed, the employee should take reasonable measures to ensure the not public data are not accessed by individuals without a work reason. Once the work reason to access the data is reasonably finished, the employee must properly store the not public data according to the provisions of MN Chapter 13.”*

### 3. 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 City will obtain the individual’s informed consent form. Any sharing of not public data will be strictly limited to the data necessary or required to comply with the applicable law.

#### **4. Ensuring that not public data are not accessed without a work assignment.**

Within the City of St. Paul Park, departments may assign tasks by employee or by job classification. If a department maintains not public data that all employees within its department do not have a work assignment allowing access to the data, the department will ensure that the not public data are secure. This policy also applies to shared workspaces.

Recommended actions for ensuring appropriate access include:

- Assigning appropriate security roles, limiting access to appropriate shared network drives, and implementing password protection for not public electronic data.
- Password protecting employee computers and locking computers before leaving workstations
- Securing not public data within locked work spaces and in locked file cabinets
- Shredding not public documents before disposing of them

#### **5. Penalties for unlawful accessing not public data**

The City of St. Paul Park 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 who may pursue a criminal misdemeanor charge.

### **Contacts**

#### **Responsible Authority**

Sharon Ornquist, City Clerk  
City of St. Paul Park  
600 Portland Avenue  
St. Paul Park MN 55071

#### **Data Practices Compliance Official**

Sharon Ornquist, City Clerk  
City of St. Paul Park  
600 Portland Avenue  
St. Paul Park MN 55071

#### **Data Practices Designees(s)**

Kevin Walsh, City Administrator  
Jessica Billmeyer, Chief of Police

## Inventory of Data on Individuals maintained by the City of St. Paul Park

Name of Record, File, Process, Form or Data Type	Description (understandable to general public)	Data classification	Citation for Classification	Employee Work Access
Alarm System Locations	Locations of alarm systems within the City.	Non-public	MS 13.37 sub 1	Licensing Clerk All Police Department staff on an as needed basis to respond to alarm calls.
Attorney Data	Data related to attorney work product or data protected attorney-client privilege	Private	MS 13.393	Certain employees on an as needed basis as part of specific work assignments
Benefits Enrollment Forms	Employee's medical, dental, deferred compensation, etc. election forms and FML documents	Private	MS 13.43 HIPAA	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• Finance Officer</li> <li>• City's benefit provider</li> </ul>
Civil investigative data	Data that are collected in order to start or defend a pending civil legal action, or because a civil legal action is expected	Confidential Public	MS 13.39	Certain employees on an as needed basis as part of specific work assignments
Community Crime Prevention Programs	Crime prevention block maps. List volunteers who participate in Community Crime Prevention programs, their home and mailing addresses, phone numbers, email and digital addresses.	Non-public	MS 13.37	<ul style="list-style-type: none"> <li>• Police Chief, Emergency Manager, or public health official.</li> <li>• Police Officer overseeing program</li> <li>• Volunteers participating in crime prevention programs.</li> </ul>
Complaints—Real Property	By citizens about the use of real property	Public Private Confidential	MS 13.44	Certain employees on an as needed basis as part of specific work assignments

Continuity of Operations	Personal home contact information used to ensure that an employee can be reached in the event of an emergency or other disruption affecting continuity of operation of a government entity	Private	MS 13.43 sub. 17	Certain employees on an as needed basis as part of specific work assignments
Correspondence	Letters and electronic correspondence	Public Private Confidential	Various	Certain employees on an as needed basis as part of specific work assignments
Correspondence—Elected Officials	Correspondence between individuals and elected officials is private data on individuals, but may be made public by either the sender or the recipient.	Private Public	MS 13.601	
Council/Commission Member Data	Data pertaining to Council and Commission Member applicants and appointees.	Public Private Confidential	MS 13.601	Certain employees on an as needed basis as part of specific work assignments
Deferment application	Verifications of income, ownership etc.	Private Non-public	MS 13.51 sub 2, MS 13.52	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• City Council</li> <li>• Assessment Clerk</li> </ul>
Electronic payments	Credit card, charge card, debit card, and other electronic transactions (ACH)	Private	MS 16A.626	<ul style="list-style-type: none"> <li>• Finance Officer</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Expense/Travel Reports -- Council/Commission	Expense and travel reimbursement requests	Public Private	MS 13.601 MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• Finance Officer</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Expense/Travel Reports-- Employees	Expense and travel reimbursement requests	Public Private	MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• Finance Officer</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Firearm applications	All data pertaining to the	Private	MS 13.87	<ul style="list-style-type: none"> <li>• Police Chief</li> </ul>

	purchase or transfer of firearms and applications for permits to carry firearms which are collected			<ul style="list-style-type: none"> <li>Administrative Assistant</li> </ul>
Government services transaction data	Credit card, charge card, debit card and other electronic transactions	Private	MS 16A.626	City Administrator Finance Officer Certain employees on an as needed basis as part of specific work assignments.
Insurance Claims	Claims filed by or against the city.	Public Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Internal Audit data	<ul style="list-style-type: none"> <li>Data created, collected, and maintained for the purpose of performing audits and/or relating to an audit or investigation;</li> <li>Working papers gathered or generated until the final report is published or audit becomes inactive</li> </ul>	Public Private Confidential	MS 13.392 MS 13.43 MS 13.37	<ul style="list-style-type: none"> <li>City Administrator</li> <li>Finance Officer</li> <li>Internal Auditor</li> <li>Agency General Counsel</li> </ul>
Labor relations information	Management positions that have not been presented during the collective bargaining process or interest arbitration, including information collected or created to prepare the management position	Private Confidential	MS 13.37 sub 1(a)	<ul style="list-style-type: none"> <li>City Administrator</li> <li>City Council</li> </ul>
Law Enforcement Data	Criminal investigative collected or created by law enforcement in order to prepare a case against a person while the investigation is active and if the data would jeopardize another investigation or reveal identity of "protected" individuals.	Public Private	MS 13.82	Certain employees on an as needed basis as part of specific work assignments
Licenses	Financial data collected as part of			Certain employees on an as needed

	the licensing application; this may include Social Security Numbers, Tax IDs, and banking information.			basis as part of specific work assignments
Notary Journals	Journal of notary services as a formal record documenting the notary services, if identification number is listed	Private		Only the owner of the Notary Journal
OSHA Reports	OSHA Reports and exposure records	Public Private	MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• City Clerk</li> </ul>
Parks & Recreation <ul style="list-style-type: none"> <li>• Fee waiver sheets</li> <li>• Mailing Lists</li> <li>• Enrollment</li> </ul>	data collected and maintained for the purpose of enrolling individuals in recreational and other social programs are private: the name, address, telephone number, any other data that identify the individual, and any data which describes the health or medical condition of the individual, family relationships and living arrangements of an individual or which are opinions as to the emotional makeup or behavior of an individual. Fee waiver sheets for low income participants.	Private	MS 13.462 MS 13.548	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• City Clerk</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Payroll Checks	Payroll Checks (cancelled and voided)—paid and returned checks. Garnishments. W2, W3, W4	Public Private	MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• Finance Officer</li> </ul>
Personal contact and online account information	Telephone number, email address, and usernames and passwords collected, maintained, or received by a government entity of notification purposes or as part of a subscription list of an entity's	Private	MS 13.356	Certain employees on an as needed basis as part of specific work assignments

	electronic periodic publications as requested by the individual.			
Personnel data <ul style="list-style-type: none"> <li>• Employee</li> <li>• Applicant</li> <li>• Volunteer</li> <li>• Independent contractor</li> <li>• Firefighters</li> <li>• Elections</li> <li>• Elected &amp; appointed Officials</li> </ul>	Data about employees, applicants, volunteers, and independent contractors; labor relations information. Record of prior and current employment history. Data relating to hiring, assessments, promotion, discipline, and related administrative personnel actions	Public Private Confidential	MS 13.43 MS 179A.03, sub 4	Certain employees on an as needed basis as part of specific work assignments
Police Report Requests	Data request for police reports where the requestor has provided identification information.	Public Private	Various	<ul style="list-style-type: none"> <li>• Responsible Authority</li> <li>• Data Practices Compliance Official</li> <li>• Police Chief</li> </ul>
Property Acquisition	Deeds, contracts, correspondence, purchase valuation data, agreements, property data	Public Protected non-public Confidential	MS 13.44, MS 13.585	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• City Council</li> <li>• EDA</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Real Property Appraisal Data	Estimated or appraised values of individual parcels of real property that are made by personnel of the state or apolitical subdivision or by independent appraisers for the purpose of selling or acquiring land through purchase or condemnation.	Confidential Private Public	MS 13.44, sub 3	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• City Attorney</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Response to data requests	Data collected by data practices compliance official in responding to requests for data maintained by Admin	Public Private	Various	<ul style="list-style-type: none"> <li>• Responsible Authority</li> <li>• Data Practices Compliance Official</li> <li>• Data Practices Designee(s)</li> </ul>
Responses to Requests for Proposals (RFPs) and requests for bids	Responses to Requests for Proposals (RFPs) and requests for bids. Trade secret data in response	Public Non-public Private	MS 13.591	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• City Engineer</li> <li>• Certain employees on an as needed</li> </ul>



	to RFP and bids are Private. Sealed bids, including the number of bids received is non-public prior to opening			basis as part of specific work assignments
Security Information <ul style="list-style-type: none"> <li>• Data that would jeopardize security</li> <li>• Checking account numbers</li> <li>• Building Plans</li> <li>• Internet communication service accounts</li> <li>• Global positioning system locations</li> </ul>	Data that would substantially jeopardize the security of information, possessions, individuals or property against theft, tampering, improper use, attempted escape, illegal disclosure, trespass, or physical injury, if the data were released to the public.	Private	MS 13.37	Certain employees on an as needed basis as part of specific work assignments
Social Security Numbers	Social Security numbers assigned to individuals	Private	MS 13.355	Certain employees on an as needed basis as part of specific work assignments
Time Sheets	Data that would reveal reasons of the use of sick or medical leave, or other not public data	Private	MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• Finance Officer</li> <li>• Administrative Assistant</li> </ul>
Trade Secret Information	Data including a formula, pattern, compilation, program, device, method, technique or process that was supplied by the affected individual or organization	Non-public	MS 13.37	Certain employees on an as needed basis as part of specific work assignments
Unemployment Compensation Billings	Records of billings from DEED for employee unemployment compensation	Private	MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> <li>• Finance Officer</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
Vacant Housing Registration	Location of vacant housing within the City	Non-public	MS 13.37	<ul style="list-style-type: none"> <li>• Licensing Clerk</li> <li>• All Police Department staff</li> </ul>
Workers Compensation	<ul style="list-style-type: none"> <li>• Records of billings from</li> </ul>	Private	MS 13.43	<ul style="list-style-type: none"> <li>• City Administrator</li> </ul>

<p>Information</p>	<p>LMCIT for employees who receive workers compensation benefits.</p> <ul style="list-style-type: none"> <li>• Personnel and Medical data disclosed for the purpose of administration of the WC program.</li> <li>• Labor Relations Data— management positions on economic and non-economic items that have not been presented during the collective bargaining process or interest arbitration, including information specifically collected or created to prepare the management position.</li> </ul>		<p>MS 13.43, sub. 18  MS 13.384, sub. 3  MS 13.37, sub 1  MS 13.791</p>	<ul style="list-style-type: none"> <li>• Finance Officer</li> <li>• City Clerk</li> <li>• Certain employees on an as needed basis as part of specific work assignments</li> </ul>
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