
Retention of Electronic Records and Information
(formerly Education Data / Records Retention)

The Madison Board of Education (the “Board”) complies with all state and federal laws and regulations regarding the retention, storage and destruction of electronic information and records. The Superintendent or designee shall be responsible for developing and implementing administrative regulations concerning the retention, storage, and destruction of electronic information and the dissemination of such administrative regulations to all school officials, employees, and individuals granted access to the computer systems and/or networks of the Madison Public Schools (the “District”) and/or who send electronic messages as part of their work for the District. Collectively, all individuals granted access to the District’s computer systems are referred to as the “Users”.

Use of ~~E-Mail~~ Electronic Messages and Electronic Communications

The Board ~~provides~~ has installed computers, and a ~~computer network(s)~~, including Internet access and ~~an e-mail system, as well as any~~ electronic messaging systems, on Board premises and may provide other electronic devices that can have the ability to send and receive messages with an operating system or network communication framework. ~~access the networks such as wireless and/or portable electronic hand-held equipment that can be used for word processing, wireless Internet access, image capture and recording, sound recording, information transmitting and/or receiving, storing, etc. (including but not limited to~~ Devices include but are not limited to personal ~~laptops~~ computing devices, cellular phones, Smartphones, network access devices, ~~Kindles, Nooks, cellular telephones, radios, personal cassette players, Walkman, CD players, I-Pads or other tablet computers, tablets,~~ walkie-talkies, ~~Blackberries,~~ personal gaming systems, Bluetooth speakers, personal data assistants, ~~I-Phones, Androids~~ and other electronic signaling devices. Electronic messaging systems include mobile, chat, and instant message; cloud collaboration platforms, including internal chat, peer-to-peer messaging systems, and draft email message transfer; and products that have the ability to create duration-based or subjective removal of content, such as Snapchat, and security focused platforms, such as Signal. The Board’s computers, computer networks, electronic devices, Internet access and electronic

33 messaging systems are collectively referred to), ~~(referred to collectively~~ as "the computer
34 systems"), and are provided in order to enhance both the educational opportunities for our
35 students and the business operations of the district.

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37 Electronic messages sent by users as part of their work and/or by using the district's computer
38 systems and/or network(s) are not private communications and are potentially subject to
39 disclosure, regardless of whether the messages are sent using personal devices or the District's
40 computer systems. Users must understand that the Board has reserved the right to conduct
41 monitoring of ~~these the District's~~ computer systems and may do so *despite* the assignment to
42 individual users of passwords for system security. Any password systems implemented by the
43 District are designed solely to provide system security from unauthorized users, not to provide
44 privacy to the individual system user.

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46 *The system's security aspects, message delete function and personal passwords may be bypassed*
47 *for monitoring purposes. Therefore, users must be aware that they should not have any*
48 *expectation of personal privacy in the use of these computer systems. This provision applies to*
49 *any and all uses of the District's computer systems, including any incidental personal use*
50 *permitted in accordance with the Board's policy and regulations regarding computer use by users.*

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52 Any retained messages may be retrieved as part of routine monitoring by the Board, an employee
53 investigation, a search for documents pursuant to a Freedom of Information Act request, or a
54 formal discovery process as part of litigation. Users should bear in mind that ~~e-mail~~ electronic
55 messages may be retained at different locations within the computer network and that these
56 messages are subject to retrieval, regardless of whether the User has deleted such messages from
57 User's account.. Consequently, users should use discretion when using computers or other
58 electronic technology to send, record or retain electronic ~~communications~~ messages and
59 information.

Retention of Electronically Stored Information

~~Electronic communications~~ Electronically stored information on District computers or electronic communication systems shall be retained only as long as necessary. The same record retention policy that applies to paper records applies to electronically stored information, including ~~e-mail communications~~. Electronic messages. Therefore, like paper records, the content and function of an electronic record, including ~~e-mail communications~~ electronic messages, determines the retention period for that document. The District will comply with all of the minimum standards set forth in the Municipal Records Retention Schedules, as issued by the Office of the Public Records Administrator for the State of Connecticut.

In addition to the retention guidelines established by the Board and used by ~~school-district~~ District officials and employees, all ~~school-~~ District officials and employees have a duty to preserve all records and electronic information, including records and electronic information that might otherwise be deleted or destroyed, that relate to any matter that is currently in litigation or may be anticipated to involve future litigation.

Legal References:

Conn. Gen. Stat. §§ 1-200(5); 1-211; 1-213(b)(3)

Conn. Gen. Stat. § 7-109

Conn. Gen. Stat. § 11-8 et seq.

General Letters 96-2 and 2009-2 of the Public Records Administrator

Public Records Policy 01, *Digital Imaging*, of the Public Records Administrator

(Aug. 2014)

Record Retention Schedules Towns, Municipalities and Boards of Education

Connecticut State Library, Office of the Public Records Administrator, Authorization for Disposal of Original (Non-Permanent) Paper Records Stored as Digital Images, Form RC-075.1 (revised 12/2021)

Frequently Asked Questions about E-mail, CT Public Records Administrator, *available at* <https://ctstatelibrary.org/wp-content/uploads/2015/05/EmailGuidelines.pdf>.

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