

**Hawthorn Academy**  
**Policy: Information Technology Security Policy**  
**Adopted: October 11, 2017**



**Purpose**

Hawthorn Academy (the "School") has a duty to ensure the security of the School's computer equipment, systems, and networks so that the sensitive data maintained or stored on them is protected. The purpose of this policy is to explain how the School will perform this duty in compliance with state and federal law.

**Policy**

The School will protect sensitive data, including personally identifiable student data, in accordance with reasonable data industry best practices and state and federal law. Applicable state and federal law includes but is not limited to the Utah Student Data Protection Act, the Utah Family Educational Rights and Privacy Act, Utah Administrative Code Rule R277-487 Public School Data Confidentiality and Disclosure, the federal Family Educational Rights and Privacy Act, and the Government Records Access and Management Act.

Information Technology Systems Security Plan

Utah Administrative Code Rule R277-487 requires the School to, among other things, have an Information Technology Systems Security Plan that addresses the following:

- (1) System Administration;
- (2) Network Security;
- (3) Application Security;
- (4) Endpoint, Server, and Device Security;
- (5) Identity, Authentication, and Access Management;
- (6) Data Protection and Cryptography;
- (7) Monitoring, Vulnerability, and Patch Management;
- (8) High Availability, Disaster Recovery, and Physical Protection;
- (9) Incident Responses;
- (10) Acquisition and Asset Management; and
- (11) Policy, Audit, and E-Discovery Training.

The Lead Director shall establish an administrative Information Technology Systems Security Plan that complies with Utah Administrative Code Rule R277-487 and other applicable law.

The Information Technology Systems Security Plan shall work in conjunction with this policy and the School's Student Data Privacy and Security Policy, Data Governance Plan, metadata dictionary, and any other School policy, procedure, or plan concerning data privacy and security.

## IT Security Manager

The School hereby designates its contracted information technology provider as the School's Information Technology Security Manager ("IT Security Manager"). The IT Security Manager shall oversee information technology at the School and fulfill the responsibilities of the IT Security Manager as described in the School's Data Governance Plan and Information Technology Systems Security Plan. When appropriate, the Lead Director may delegate such responsibilities to another individual or contracted entity.

### **Training**

On an annual basis, the School shall provide appropriate training to its employees, aides, and volunteers regarding information technology security matters.

Signature:

 Oct 11, 2017  
Meggen Pettit, Board President Date