DEPARTMENTAL STANDARD OPERATING PROCEDURE Miami-Dade Aviation Department DSOP NO. 03-01 Effective: June 24, 2003

SUBJECT: SAFEGUARDING EMPLOYEE PERSONAL DATA

Purpose: To establish policy and procedures to safeguard personal data of current and former Aviation employees.

BACKGROUND: Miami-Dade Aviation Department (MDAD) has the responsibility for maintaining and protecting the confidentiality of current and former employees' personal information such as their social security numbers, home addresses, and telephone numbers.

I. AUTHORITY:

- A. Florida Statutes, Chapter 119, Public Records Law.
- B. <u>Miami-Dade County Code, Chapter 25, Aviation Department Rules and</u> <u>Regulations, authorizes the Aviation Director to promulgate policies,</u> rules, regulations, orders, procedures or instructions for employees or for those who do business at the Airport.

II. POLICY:

- A. According to Chapter 119, Public Records Law, F.S., personnel files maintained by a governmental agency shall be considered public records and are open for inspection and examination by any person at reasonable times and under reasonable conditions and supervision. However, employee social security numbers, home addresses, and personal telephone numbers are confidential and must not be disclosed.
- B. The Administrative Services and Employee Development Division acts as the liaison between MDAD and the Miami-Dade Employee Relations Department. The Division also serves as the official *departmental* personnel records custodian of all Aviation employees' personnel files.
- C. Division Managers, Chiefs, Section or Office supervisors having immediate control of divisional personnel files serve as *divisional* personnel records custodians.

D. Divisional personnel records custodians must ensure that all persons responsible for managing or handling personnel related information at an assigned location receive appropriate initial and on-going training to ensure compliance with the policy and procedures delineated in this document.

III. PROCEDURES:

- A. Documents containing employee personal data in transit from one location to another must always be mailed from office to office or to the particular employee in sealed envelopes.
- B. The name and last four digits of the social security number may be used as an identifier when needed, e.g. John Doe, SS # xxx-xx-6111.
- C. Some of the documents that contain employee personal data include but are not limited to:
 - 1. Personnel Change Documents (PCDs), Payroll Activity Reports (PAR), Overtime Reports, and Leave Requests Forms;
 - 2. Employee payroll deduction cards; e.g. United Way, government issued bonds, etc.
 - 3. Performance evaluations, appeals, special recognition increase justifications, disciplinary action reports, records of counseling and other disciplinary-related documents;
 - 4. Health insurance information, accident/injury reports, worker's compensation and related correspondence; injury diagnosis, treatment information, and disability forms;
 - 5. Miscellaneous correspondence.

IV. VIEWING PERSONNEL RECORDS:

- A. All requests to view employees' personnel records must be addressed to the departmental personnel records custodians in the Administrative Services and Employee Development Division.
- B. Departmental personnel records custodians are responsible for obscuring all confidential information with removable white self-adhesive correction tape in personnel files requested for view or duplication, and monitoring the activities of persons viewing personnel records in an assigned location.

- C. Requests to access departmental personnel files while conducting sensitive investigations or subpoenas of personnel files must also be addressed to the appropriate departmental personnel records custodian.
- D. When questions about the propriety of a request arise, the County Attorney's Office must be contacted as to the appropriate course of action.

REVOCATION: None.

CROSS REFERENCE: None.

Angela Gittens, Aviation Director

Date: June 24, 2003