Policy Number: 3120

DATA PRIVACY POLICY

PURPOSE

American Leadership Academy Spanish Fork (ALA SF) is committed to a secure learning environment that safeguards student privacy while fostering leadership and academic excellence. Because ALA operates primarily as an in-person campus in Spanish Fork, this policy addresses the distinct operational realities of on-site data security, physical record management, and classroom technology networks utilized by physical attendees.

Regulatory Compliance

This policy establishes the protocols and procedures for managing data maintained by the school. ALA SF will strictly conform to all mandatory state and federal privacy regulations, including:

- Federal Statutes: The Family Educational Rights and Privacy Act (FERPA) and the Children's Online Privacy Protection Act (COPPA).
- Utah State Code: The Utah Student Data Protection Act (SDPA, Utah Code 53E-9-301), the Government Records Access and Management Act (GRAMA, Utah Code 63G-2), and the Government Data Privacy Act (Utah Code 63A-19-101).
- Utah Board Rules: Administrative Rule R277-487

Designated Data Governance Roles

Per Utah Administrative Rule R277-487, the ALA SF Board of Trustees will formally appoint the following roles:

- Student Data Manager: Responsible for authorizing and managing the sharing of personally identifiable student data, ensuring the maintenance of the public USBE Metadata Dictionary entry, and administering the mandatory annual Student Data Collection Notice.
- Information Security Officer: Appointed to implement, monitor, and audit the school's digital controls. ALA SF adopts the CIS Controls (Center for Internet Security) or a state-approved equivalent framework to systematically mitigate information security risks.

Campus Data & Security Controls

- Locked Storage: Cumulative student files, Special Education records (IEPs/504 plans), and health records must be kept in fireproof, locked filing cabinets within restricted administrative areas.
- Access Logs: Any physical retrieval of student files by staff must be logged, requiring a clear "legitimate educational interest" under FERPA.

Local Network and Device Governance

Student interaction with technology is actively managed on campus via ALA SF policy 3070 and policy 3080.

- On-Premises Filtering: ALA SF's campus Wi-Fi network must utilize content filtering compliant with federal guidelines to shield students from harmful material.
- Classroom Device Restrictions: In accordance with campus device rules, students may only connect to authorized student networks. Unauthorized recording, photography, or data transmission within classrooms or private facility spaces (e.g., locker rooms) is strictly prohibited.

Third-Party EdTech & Software Procurement

- Contract Mandates: Any software tool, application, or online curriculum provider used in an ALA SF classroom that collects student PII must execute a Utah-compliant Data Privacy Agreement (DPA) prior to deployment.
- Prohibition on Commercialization: Third-party operators are legally barred from using student PII acquired through ALA SF for targeted advertising, profiling for non-educational uses, or commercial sale.
- ALA SF has the legal authority to conduct audits on vendors to verify compliance.

Public Web and Media Publishing Guidelines

Per ALA SF state and federal media frameworks:

- Work and Photo Disclosures: When publishing student work or school-related achievements on the public internet, only the student’s first name may be used.
- Anonymity in Media: To maintain student safety on an open campus, student names must never be directly linked or paired with identifiable photographs on the public school website or social media channels without an un-revoked directory information waiver on file.
- Signed opt-in / consent forms: If a parent or legal guardian signs a specific Media Release or Directory Information disclosure form permitting the publication of the student’s full name alongside photos or work, the school may publish the full name.

Parent and Student Rights

Parents or guardians of ALA students maintain the statutory right to:

- Inspect, review, and request updates or corrections to their student's education records by contacting the campus administrative office.
- Receive an explicit annual disclosure regarding what data elements are categorized as "Directory Information."
- Opt out of optional student data collections or public directory disclosures.
- Submit formal privacy inquiries or file complaints directly through the school data manager, or escalate concerns to the Utah Public Education Hotline.

REFERENCES

FERPA, COPPA, SDPA and GRAMA
Utah Code 53E-9-301
Utah Code 63G-2
Utah Code 63A-19-101
Administrative Rule R277-487
House Bill 55