Number: Title	Data Destruction Policy		
Approved by	Early Childhood Advisory Council	Approved Date	10/17/2024

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), understands that responsible use of SC ECIDS data also includes the responsible destruction of SC ECIDS data by external entities after their approved use.

PURPOSE

The purpose of this policy is to provide the necessary details about how external/authorized data users are to destroy data securely and responsibly after approved use. This policy applies to data acquired by the process outlined in the "Data Access and Acquisition Policy" and not the data referenced in the "Data Use Policy." This policy applies to all data stored within the SC ECIDS, including but not limited to personally identifiable information (PII), sensitive records, and research data.

SCOPE

This policy applies to all data collected, processed, and stored within the SC ECIDS initiative, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Personally Identifiable Information (PII)** is any data that could potentially identify an individual, including names, addresses, social security numbers, or other identifying information.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program
- **Participating programs** are programs that regularly contribute data to SC ECIDS.
- **External/authorized users** are individuals or entities granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education.

ROLES AND RESPONSIBILITIES

- External/authorized users are responsible for abiding by SC ECIDS data destruction policies.
- DGWG is responsible for outlining, monitoring, and maintaining data destruction guidelines for SC ECIDS data.

PROCESS
1. SC ECIDS initiatives follow the data retention and destruction protocols of the agency or organization in which the data initiative is housed, as outlined in the DSAs, and the agencies from which data are received.
2. The DGWG and technical lead(s) of each ECIDS initiative align data destruction guidelines for external/authorized users across participating programs and develop approved data destruction procedures for external/authorized users of the ECIDS data, including:
    a. <u>Secure Destruction Methods</u>: The DGWG identifies approved methods (e.g., data destruction software) for destroying data to ensure it is irrecoverable and unreadable. Clarify methods for both electronic data and, if applicable, physical media (e.g., paper documents, flash drives). Upon approval, these methods will be listed as an appendix to this policy for external/authorized users' reference. Data requestors are required to share how they will follow these pre-approved methods in their data access request application.
    b. <u>Certification and documentation of destruction</u>: The DGWG decides whether and how data destruction should be documented and/or certified. If destruction logs are required, the DGWG provides information on what information must be recorded (e.g., date, time, location, and method of destruction), whether the documentation must be certified by a third party, and for how long the destruction records must be maintained. Upon DGWG approval, these decisions will be communicated as an appendix to this policy for external/authorized users' reference.
3. The DG Coordinator communicates data destruction guidelines with external/authorized users of SC ECIDS data by coordinating the inclusion and updating of these guidelines on the ECAC Data Hub website.
4. The DGWG, supported by the DG Coordinator, periodically reviews the data destruction guidelines to identify issues. As outlined in the Data Scope and Management Policy, all changes will be communicated to the ECAC by the DG Coordinator in the Board of Trustees Meeting Report.

PROCEDURE FOR REPORTING DATA DESTRUCTION ISSUES
1. If an external/authorized user or participating program identifies a data destruction issue that affects SC ECIDS data, they will immediately notify the DG Coordinator in writing via email.
2. The DG Coordinator will notify the relevant technical leads and affected participating programs of the issue via email.
3. The DG Coordinator, technical lead(s), and affected participating programs will work with the external/authorized user to address the data destruction issue.
3. Any member of the DGWG may request the formation of a Data Destruction Issue Project Team (See "Establishment of Project Teams Policy") to further identify solutions to the issue.
4. The DG Coordinator will document all ongoing issues for the annual review of DGWG procedures and processes.

RELATED POLICIES

SC ECIDS DATA GOVERNANCE MANUAL

- Data Access and Acquisition Policy
- Data Scope and Management Policy
- Establishment of Project Teams Policy

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Molly Tuck	Revision of policy shared with DGWG	September 25, 2024	1.1
Molly Tuck	Initial version of policy	September 4, 2024	1.0