



## **PRIVACY, SAFETY AND SECURITY OF DATA PLAN**

## **Privacy, Security, and Security of Data Plan**

The Vocational Nursing Institute Inc. does not have a network for its computers. Each employee has their own computer. The school uses avast software for privacy and security with a heightened fire wall. Each employee is issued their own user id and password and are not to share it. Passwords are changed on a periodic basis to maintain security. When an employee leaves their information is deleted from the system or password is changed if access is still required. Carbonite is installed on all key employee computers for daily back up. The school also uses a business drop box and has had external drives available or USB flash drives for staff to keep projects they are currently working on. The school does not have any software programs that it uses except for FAME which is on one computer in the financial aid director's office, password protected, and has appropriate security in place to prevent breaches.

Software used for privacy and security:

1. PDI testing with merchant services
2. Avast software on each computer for privacy and security
3. Carbonite on all key employee computers for daily back up
4. Business drop box for key documents (scanned student files, transcripts, etc.)
5. Sharepoint site for key documents for employees and human resources

Employee Orientation:

1. Orientation to password user id, not sharing, and protocols.
2. Alarm code issued per employee
3. Cyber security training upon hire (online course)
4. Review of policies and procedures

## 5. Orientation to carbonite and avast on computers

# THE VOCATIONAL NURSING INSTITUTE, INC.

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## Policy and Procedure Manual

### EMERGENCY BACK UP TECHNICAL SERVICES

**Policy:** It is the policy of this school, to maintain a BACK UP system for emergency situations where power is lost, or systems are down due to natural disaster.

**Procedure:**

1. Website data is automatically saved and backed up off site. This is done ongoing throughout the day.
2. Email data is backed up through digital space ongoing, no special actions are required by staff.
3. The building has a backup battery system in place if the power should go out, battery operated lighting will turn on. The computers and laptops will work off battery power for up to two hours.
4. Computerized data is backed up daily on all main business computers using carbonite. In addition, staff are using the business drop box and/or using an external drive for daily work documents.
5. The technical infrastructure is maintained through contracts with Skynet Technology services, Alt-Creative in Austin, Texas, and Geek squad, locally in Houston, Texas.
6. If technical equipment malfunctions or is not working properly then the appropriate vendor is contacted. If it is the actual internet connection, the connection will be reset. If this does not work then the phone / internet provider will be contacted by the administrative staff team. If a laptop or computer fails, the administrative staff will try and troubleshoot, if that is unsuccessful then Skynet Technologies will be contacted to come in and assist. Normally same day service is provided.
7. The School Director is to be notified of ANY and ALL equipment malfunctions, outages, or need for repair verbally as soon as possible.
8. Avast software is on each computer to provide privacy and security of data as VNI does not have a network. Williams Communications is contracted to assist with maintaining the firewall for the school and battery back up for its technical infrastructure.

## ADMINISTRATIVE POLICY &amp; PROCEDURE MANUAL

Policy Number: 1

Page 1 of 1

TITLE: POWER OUTAGE PROTOCOL

Effective Date: 01/01/2021

Revised Date:

**PURPOSE:** To define the school's procedures if there is a power outage on campus greater than 90 minutes in time.

**POLICY:** It is the policy of the school that if the power goes out for more than 90 minutes, they will follow the procedures set forth for extended power outage.

**PROCEDURE:**

1. The admin on duty will call the power company Summer Energy (google their number or look at vendor list) and notify them that our power is out if it does not come back on within 45 minutes to:
  - a. reports the outage
  - b. finds out what caused the outage
  - c. inquires when power will be restored.
2. The admin on duty will notify the Director of the above findings (a-c).
3. Employees are to stay clocked in for 90 minutes. If power is not restored, then they are to clock out and go home.
4. Employees are to document manually on their timecard the time out and a note "power out" and date.
5. The employee may submit payment using PTO for power outage as long as they follow the PTO policies in place.
6. The admin is to secure the building, close it down per the checklist, and notify the Director if not on premises.

I \_\_\_\_\_ have read and will abide by this policy, if I have any questions I will ask my Supervisor immediately upon reading this policy. I will keep this policy available for me to review when the power goes out next time and a copy will be displayed in the break room for employees.

\_\_\_\_\_ date \_\_\_\_\_  
Signature / Title

Location: TX

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# The Vocational Nursing Institute, Inc.

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## Family Educational Rights and Privacy Act (FERPA)

### NOTICE OF RIGHTS

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students".

The Vocational Nursing Institute Inc. information regarding the FERPA Act of 1974 under Section 485 9a)(1), (g), (h), and (j) is posted on the school's website located under the Notice of Disclosures tab located at: <http://vocationalnursinginstitute.com/disclosures.php>.

The school will provide a paper copy upon request.

The Vocational Nursing Institute Inc. respects the rights to privacy for all student records whether it be financial, health, institutional, or grades and transcripts. See student records policies for privacy policies regarding these areas.