



Human Resources Policies and Procedures

Policy Title: Social Security Number Privacy	Policy Number: 2.11
Effective: October 1, 2007	
Supersedes:	
Approval: <i>Carol S. Rubin</i>	Page 1 of 4

1.0 Scope

- | | |
|--|---|
| <input checked="" type="checkbox"/> Full-time | <input checked="" type="checkbox"/> Salaried |
| <input checked="" type="checkbox"/> Part-time | <input checked="" type="checkbox"/> Union |
| <input checked="" type="checkbox"/> Temporary/Contract | <input checked="" type="checkbox"/> Independent Contractors |

Employees who are covered under the provisions of a collective bargaining agreement will follow the standards as contained in their respective contracts if this policy conflicts with the language in the contract.

2.0 Purpose

To comply with the Michigan Social Security Number Privacy Act, Public Act 454 of 2004, MCL 445.81 et seq., (the "Act").

3.0 Policy

It is the policy of the City of Ann Arbor to ensure, to the extent practicable, the confidentiality of applicants', employees', vendors', citizens' and others' Social Security numbers obtained and used in the course of business and as required by law. This policy does not apply to the records or record systems maintained by its vendors, although the City will use its best efforts to require its vendors to conform to the standards set forth in this policy.

DISCLAIMER

The information contained in this Human Resources Policies and Procedures Manual supersedes all previous Human Resources rules, policies and administrative regulations. The manual is not legally binding and does not create a contract of employment, either express or implied. The City retains the right to modify, suspend, interpret or cancel any provision at any time, at the City's complete and sole discretion without prior notice.

4.0 Responsibility

- 4.1 Management is responsible for implementing restrictions to records and record systems, which contain Social Security numbers through appropriate employee training and oversight procedures.
- 4.2 All employees are responsible for complying with this policy and the Act.

5.0 Definitions

- 5.1 Record is a document, file, computer program, database, image, recording, or other means of expressing fixed information.
- 5.2 Record system is a way of storing, disseminating, or organizing records including, but not limited to, computers, telephone lines, voice mail, fax machines and filing cabinets.

6.0 Procedures

6.1 Obtaining Social Security numbers

- A. Social Security numbers should be collected only where required by Federal and State law or as otherwise permitted by Federal and State law for legitimate business reasons consistent with the Act.
- B. Such reasons include but are not limited to:
 - 1. Applicants may be required to provide a Social Security number for purposes of a pre-employment background check.
 - 2. Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment.
 - 3. Social Security numbers may be obtained from employees for tax reporting purposes, for new hire reporting or for purposes of enrollment in any City employee benefit plan.

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4. Social Security numbers may be obtained by personnel in the Safety Services Area or 15th District Court for criminal investigation purposes or the provision of Social Security numbers to a Title IV-D agency (child support/support orders), other law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution.

6.2 Use of Social Security numbers

- A. The City of Ann Arbor strictly prohibits unlawful disclosure of Social Security numbers. Social Security numbers will not be:
 1. publicly displayed; or
 2. used as the primary account number or identifier for an individual, except where existing City records or records systems require such use. Existing records or records systems, when retired, will be replaced with records or records systems that do not require or use Social Security numbers as the primary account number or identifier; or
 3. visibly printed on identification cards or badges; or
 4. used, transmitted, or stored on records or record systems that are not encrypted or secure.

6.3 Storage of and Access to Social Security numbers

- A. The City will strictly limit access to records and record systems containing Social Security numbers to those who have a legitimate reason in the ordinary course of business to have access to this information.
- B. Employees using records or records systems containing Social Security numbers must take appropriate steps to ensure the integrity of such records or record systems when not in immediate use.

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6.4 Disposal

- A. Records or record systems containing Social Security numbers will be discarded or destroyed only in a manner that protects the confidentiality of the Social Security number(s).

6.5 Penalties for Violations of the Privacy Policy

- A. Corrective action will be taken in the event of unintentional violations of this policy. Such action may include the modification of a process, practice or record or record system to better protect the confidentiality of Social Security numbers.
- B. Any employee who knowingly obtains uses or discloses Social Security numbers for unlawful purposes or contrary to the requirements of this privacy policy shall be subject to discipline up to and including discharge.
- C. The City will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of any person who knowingly obtains, uses or discloses Social Security numbers through the City for unlawful purposes.

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