



Public Safety Shared Data Systems

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POLICY/PROCEDURE #: PS12-01	TITLE: Data Classification, Access, and Dissemination
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 07/2016	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-02 Enforcement and Sanction Inter-Agency Sensitive Data Classification Form Agency-Shared Sensitive Data Classification Form Agency-Only Sensitive Data Classification Form PS Policy 12-01 Data Entry Standards – Spillman Systems Public Safety Shared Data Systems Access, Management and Dissemination Request Form
MODIFIED/REVIEWED DATE: 05/2015	

Objective:

The purpose of this policy is to define the appropriate categories of data and guidelines for the management, access and dissemination of each in compliance with Tompkins County, LETSS, and local, state, and federal governmental procedures and regulations regarding privacy and confidentiality of locally maintained Public Safety data.

Policy Statement:

All LETSS members are responsible for protecting the confidentiality, integrity, and availability of data generated, accessed, modified, transmitted, stored, or used by LETSS. Data will be protected, irrespective of the originating agency or data owner, the medium on which the data resides, and regardless of format.

General Information:

This data classification policy is applicable to all data generated, accessed, transmitted or stored on systems and networks managed or hosted by Tompkins County. For the purpose of defining management policies, the following data categories are established: Inter-Agency Sensitive Data, Agency-Shared Sensitive Data and Agency-Only Sensitive Data.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

FOIL – Freedom of Information Law

Inter-Agency Sensitive Data Classification Form – Form that summarizes data contained within this data category.

Agency-Shared Sensitive Data Classification Form - Form that summarizes data contained within this data category.

Agency-Only Sensitive Data Classification Form - Form that summarizes data contained within this data category.

Data Owner – Individual or agency responsible for approving access to, modification and/or dissemination of, data.

Data Custodian – Individual or agency responsible for maintaining Tompkins County hosted systems, hardware, software and applications which support LETSS services. For the purposes of this policy, Tompkins County ITS is considered the data custodian. Exclusions include data from systems managed by Tompkins County Department of Emergency Response (i.e. Motorola Radio, Personal Emergency Response Systems[PERS]/Digitize Alarm, and 911 Phone Systems)

Data Categories:

Inter-Agency Sensitive Data: - Information that is intended for collaborative use and may be accessed, managed and/or modified by all Public Safety agencies with access to systems supported by the Data Custodian. To promote the most efficient use of the systems, data within this category shall be approved by the Tompkins County Department of Emergency Response. In addition, the guidelines for the collective management of data within this category shall be defined under Policy PS Policy 12-01 “Data Entry Standards – Spillman Systems”.

Agency-Shared Sensitive Data: – Data Owner information defined and protected by LETSS policies and procedures, agency defined restrictions, or local, State or Federal statutes and regulations. The inappropriate disclosure of Agency-Shared Sensitive Data by anyone other than the Data Owner without adhering to procedures defined within PS policy 12-01 “Data Classification, Access and Dissemination”, is not allowed and may result in consequences as defined within LETSS policy 12-02 “Enforcement and Sanction”, or potential litigation.

Agency-Only Sensitive Data: – Information explicitly defined and protected by individual LETSS agencies. The inappropriate disclosure of Agency-Only Sensitive Data by anyone other than the Data Owner without adhering to procedures defined within PS policy 12-01 “Data Classification, Access and Dissemination”, is not allowed and may result in consequences as defined within LETSS policy 12-02 “Enforcement and Sanction”, or potential litigation.

Procedure:

Data Classification Procedures

Due to the complexities and progression of shared data and systems managed by the Data Custodian, LETSS and Public Safety agencies shall be responsible for the documentation of data classified under each of the three Data Categories described in the Definitions section of this Policy (PS 12-01). Not all classification requests may be

feasible due to technical and/or process limitations within shared systems hosted by the Data Custodian. The procedures under which data is classified shall be as follows:

1. Inter-Agency Sensitive Data

- The Data Custodian will document and present to the Tompkins County Director of Emergency Response, a summary of the data contained within this category through the use of the Inter-Agency Sensitive Data Classification Form.
- A review and recommendation of the Inter-Agency Sensitive Data Classification Form will be completed by LETSS and any other agencies or governmental bodies as determined by the Tompkins County Director of Emergency Response. Any recommended changes resulting from the review process will be documented and submitted to the Tompkins County Director of Emergency Response.
- The Tompkins County Director of Emergency Response will have the authority to approve the final version of the Inter-Agency Sensitive Data Classification Form.
- Any subsequent request for changes to data categorized within Inter-Agency Sensitive Data shall be submitted in writing to the Tompkins County Director of Emergency Response.

2. Agency-Shared Sensitive Data

- LETSS will document a summary of the data contained within this category through the use of the Agency-Shared Sensitive Data Classification Form.
- A review and recommendation of the Agency-Shared Sensitive Data Classification Form will be completed by LETSS. Any recommended changes resulting from the review process will be documented through LETSS.
- LETSS will have the authority to approve the final version of the Agency-Shared Sensitive Data Classification Form.
- Any subsequent request resulting in changes to data categorized within the approved Agency-Shared Sensitive Data Form shall be submitted for review by LETSS.

3. Agency-Only Sensitive Data

- Individual LETSS agencies will document their data contained within this category through the use of the Agency-Only Sensitive Data Classification Form. Classification of data within this category can only be submitted by the Data Owner.
- Data Owners will have the authority to approve the final version of the Agency-Shared Sensitive Data Classification Form.
- Any subsequent request resulting in changes to data categorized within the approved Agency-Shared Sensitive Data Form shall be submitted to the Data Custodian for implementation.

Data Access Procedures

At Data Owner's request, Data Custodian shall be responsible for assigning technical privileges to access data owned by requesting Data Owner. Due to the complexities and progression of shared data and systems managed by the Data Custodian, not all access requests may be feasible due to technical and/or process limitations. The procedures under which access is determined shall be as follows:

1. Inter-Agency Sensitive Data

- To promote the most efficient use of the systems, access to and/or management of data within this category shall be granted to standard Spillman users accounts unless otherwise defined in writing by LETSS. Requests made by non-LETSS agencies or individuals for access and/or management

to data within this category must be defined, reviewed and approved by LETSS.

2. Agency-Shared Sensitive Data

- Access to, and management of, data within this category shall be granted by the Data Owner, via written request to the Data Custodian.

3. Agency-Only Sensitive Data

- Access to, and management of, data within this category shall be granted by the Data Owner, via written request to the Data Custodian.

Data Dissemination Procedures

1. Inter-Agency Sensitive Data

- Dissemination of data within this category is granted to LETSS agencies unless otherwise defined in writing by LETSS.
- Dissemination of data within this category by non-LETSS agencies or individuals must be defined, reviewed and approved by LETSS through the use of the Public Safety Shared Data Systems Access, Management and Dissemination Request Form.

2. Agency-Shared Sensitive Data

- No data shall be disseminated by any other person, entity or agency without written permission from the Data Owner.

3. Agency-Only Sensitive Data

- No data shall be disseminated by any other person, entity or agency without written permission from the Data Owner.