

City of San José

Data Usage Policy (DUP) for Youth Intervention Data Management

Owning department(s): Parks, Recreation and Neighborhood Services (PRNS) – Youth Intervention Services (YIS)

1) Purpose

The Parks, Recreation and Neighborhood Services Department (PRNS) and its Youth Intervention Services (YIS) and its partner programs deliver case management, incident prevention and suppression, and other youth services to support the educational, health, and life outcomes of San José youth and their families. Data is used to provide the services and connect youth with partner programs.

2) Authorized Uses:

Data collected by YIS shall only be used for the purposes outlined below. Any other usage by the City or by a third party on behalf of the City is prohibited.

1. Create service plans that support the positive educational, health, and life outcomes of San José youth and their families
2. Providing youth services through YIS and partner programs;
3. Contacting the families, schools, and youth enrolled in the services;
4. Record, prevent, and de-escalate incidents of violence or other public safety concerns:
 - a. At or around partner schools or programs, or
 - b. That involve youth enrolled in the services;
5. Anonymized or aggregated information may be used by the City to report program progress and effectiveness to partners or to the public

3) Restricted Uses:

Uses not explicitly authorized in the “Authorized Uses” section are prohibited. In addition, the City **will not** use data collected and any data generated to:

1. Inform City law enforcement of past or ongoing youth activity except in the case of life-threatening danger as determined by YIS or required under a court order
2. Share with federal immigration authorities or use in the investigation of any matter related to immigration status of a San José resident

4) Data Collection

Type of information collected can include

1. Individual demographic data, such as name, gender, age, parents names, family address and contact information, and any other relevant public safety information regarding the behavior of the person or people involved in a recorded incident;
2. Case Management Intervention services related data such as: Program enrollment and consent information, presenting problem, individual service plans and goals, services performed, units of service data, case notes, case closure information, and other relevant health and human service information from other service providers, etc.
3. Any additional information provided to YIS by the youth, their families and/or legal guardian, their school, case management partners, and the City

5) Notice

A privacy notice summarizing the content in this Data Usage Policy is provided to youth and their families when registering for youth services provided by YIS and by YIS partners when providing services on behalf of YIS. This Data Usage Policy is also available online at sanjoseca.gov/digitalprivacy.

6) Retention and Minimization

Personal information will be retained for at least 2 years in accordance with California Government Code 34090, but may be retained for longer if required by a government agency or grant provider, or if the youth and/or their family remains involved YIS and its partner programs. Personal information will be deleted from all City systems no later than 2 years after a youth and/or their family have stopped receiving services from YIS and its partner programs, and the data is no longer required by a court order, government agency, or other grant provider.

7) Access and Accuracy

Individuals, their families and/or designated guardians, and their schools may request staff from YIS to correct or update any information stored on that individual. YIS will review the request and correct any inaccurate information stored in the YIS database.

8) Accountability

In the event of a confirmed data breach where personal information has been accessed by an unauthorized party, the youth and their family/designated guardian will be notified using the contact information provided to YIS. They will be informed what data has potentially been accessed and any steps they can take to reduce any consequences.

9) Sharing

Personal information collected by YIS will only be made available to partner service providers with a documented sharing agreement that requires all parties to follow the authorized and prohibited uses listed in this document. YIS Safety Team members may share personal information among themselves information regarding an active violent incident case in real time. Additionally, personal information will be shared if required under a court order.

10) Equity and community engagement

Members of the public may submit any concerns via the public comment feature at sanjoseca.gov/digitalprivacy. Comments may also be submitted by emailing the Digital Privacy Office at digitalprivacy@sanjoseca.gov or mailing the Digital Privacy Office at 200 E Santa Clara Street, San Jose, CA 95113

11) Storage and Security

Data is stored on a secure cloud environment that can only be accessed by authorized YIS staff. YIS follows security protocol as recommended by the City's Cybersecurity Office.

12) Training

YIS staff are trained to operate under the authority of California 830.1 Welfare and Institutions Code which guides the structure and operation of a School Safety Multi-Disciplinary Team, and abides to strict confidentiality standards