



THE OHIO GENERAL ASSEMBLY

JOINT LEGISLATIVE ETHICS COMMITTEE

OFFICE OF THE LEGISLATIVE INSPECTOR GENERAL

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Personal Information Policy

The Office of the Legislative Inspector General takes seriously the protection of personally identifiable information. Pursuant to R.C. 1347.05 and O.A.C. 101-1-06 the following policy outlines procedures relative to personal information retained by the OLIG and is applicable to all OLIG employees. Questions regarding this policy should be directed to OLIG General Counsel.

1) Definitions

a) Personal Information

For purposes of this policy, personal information is any information that:

- describes anything about a person; or
- indicates actions done by or to a person; or
- indicates that a person possesses certain personal characteristics; and

that contains and can be retrieved from a system by a name, identifying number, symbol, or other identifier.¹

Examples of personal information include names, addresses, and phone numbers.

b) Confidential Personal Information

For purposes of this policy, confidential personal information is personal information that falls within the scope of R.C. 1347.15 and is prohibited from being released under Ohio's public records law.²

c) Personal Information System

For purposes of this policy, personal information system (or "system") means any collection or group of related records that are kept in an organized manner and maintained by the OLIG, and from which personal information is retrieved by the name of the person or by some identifying number, symbol or other identifier assigned to the person.³

2) Policy

a) Handling Personal Information

The OLIG maintains the following personal information systems: the Ohio Lobbying Activity Center, the Financial Disclosure Statement Database, and the Post Employment Disclosure Statement Database. Each system contains information provided by either: lobbyists and their employers; members and employees of, as well as candidates for, the Ohio General Assembly; or post employment disclosure statement filers; the information provided is required and made public pursuant to statute.⁴

When dealing with personal information, OLIG employees will:

- Use it only for official, lawful purposes.
- Only access systems and/or collect personal information if authorized to do so.
- Make every effort to accurately enter and correct data.
- Never intentionally enter false data.
- Take reasonable precautions to protect personal information from unauthorized modification, destruction, use or disclosure.
- Securely dispose of personal information according to the OLIG's Records Retention Schedule.
- Not initiate or contribute to any disciplinary or other punitive action against an individual who reports evidence of unauthorized use of personally identifiable information.
- Monitor the information, systems, and other employees for compliance with this policy.

The OLIG may also utilize certain sensitive personal information from employees in administering human resources, including but not limited to hiring, promotion, demotion, discharge, salary, and compensation issues as well as confirming eligibility, certifications or other similar processes. This information is accessible only by the Legislative Inspector General, OLIG General Counsel, and the OLIG Fiscal Specialist and may only be utilized in furtherance of official OLIG purposes.

On occasion, the OLIG may receive unsolicited personal information from individuals required to file a Financial Disclosure Statement.⁵ In such instances, the original filing is secured in a locked cabinet within the OLIG accessible only by the Legislative Inspector General and OLIG General Counsel. A redacted copy of the page containing the personal information is maintained with the form filed.

b) Handling Personal Confidential Information

As a matter of practice, the OLIG does not maintain or collect documents or systems containing confidential personal information; unless such information is the product of a complaint, inquiry, or investigation. These records are exempt from the requirements of R.C. Chapter 1347⁶ and are confidential pursuant to R.C. 102.06(F).⁷

3) Violations

Any employee who violates this policy is subject to disciplinary action up to and including termination of employment. Employees are also reminded of the confidentiality statement signed upon commencement of employment. Violations may also lead to criminal and/or civil liability.

¹ R.C. 1347.01(E).

² See R.C. 1347.15(A)(1) and 149.43.

³ R.C. 1347.01(F).

⁴ See R.C. 102.02, 102.021, 101.72, 121.62, 101.92, 101.73, 121.63, 101.93.

⁵ See R.C. 102.02.

⁶ R.C. 1347.04(A)(1)(e).

⁷ See R.C. 102.06(F): All papers, records, affidavits, and documents upon any complaint, inquiry, or investigation relating to the proceedings of the appropriate ethics commission shall be sealed and are private and confidential.