



## TOWN OF ELIZABETH

PATRICK G. DAVIDSON, TOWN ADMINISTRATOR

TO: Honorable Mayor, Mayor Pro Tem, and Board of Trustees  
FROM: Patrick Davidson, Town Administrator  
DATED: August 13, 2024  
SUBJECT: Update to Code of Conduct for Elected Officials

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### BACKGROUND

The Board of Trustees have previously approved a Code of Conduct for Elected Officials which sets forth the standards and expectations regarding the role of elected officials and members of the public, staff, and others. In an era in which personal identifying information (“PPI”) may be used for improper purposes, it is important that such information be protected. It is even more essential when dealing with student volunteers, interns, and student liaisons who may be in danger of unwanted and unauthorized contact from the public.<sup>1</sup>

As a result, the Town Attorney and Town Administrator strongly recommend that the attached resolution and supplement be considered for approval by the Board. Quite simply, the proposed language allows for the release of PPI for students, volunteering with the Town of Elizabeth, only under controlled conditions.

### ANALYSIS

In summary, the Town has an affirmative obligation to protect sensitive information for students working with the Town. This includes personal phone numbers, email addresses, home addresses, social media accounts, application materials, and anything else not directly related to the work being performed for the Town. In addition to the ethical responsibility involved in protecting student volunteers, additional protections are afforded the student under both the Fourth Amendment to the US Constitution as well as the Equal Protection Clause.

### STAFF RECOMMENDATION

Staff recommends the Board consider the proposed “Supplement Number 1” to the Town of Elizabeth Code of Conduct for Elected Officials.

### ATTACHMENTS

Resolution 24R31, A Resolution Updating the Code of Conduct for Elected Officials to Include Protection of Students’ Personal Identifying Information

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<sup>1</sup> Similar revisions will be made to the Town of Elizabeth Employee Handbook.

**RESOLUTION 24R31**

**A RESOLUTION UPDATING THE CODE OF CONDUCT FOR ELECTED OFFICIALS TO INCLUDE PROTECTION OF STUDENTS' PERSONAL IDENTIFYING INFORMATION**

WHEREAS, the Elizabeth Board of Trustees have previously approved a Town of Elizabeth Code of Conduct for Elected Officials, which included policies, directives, and conditions relative to the work to be performed by the Board, and the relationship of individual elected officials to others within the community; and

WHEREAS the Town of Elizabeth makes use of Student Volunteers, Student Interns, and Student Liaisons to not only assist Town Staff and the Board of Trustees, but also allow students to gain knowledge of the workings of public government; and

WHEREAS best practices requires the establishment of specific policies to ensure the protection of a students' personal identifying information, including phone numbers, email addresses, social media accounts, applications, and related personal information; and

WHEREAS it is the responsibility of the Board of Trustees to establish a policy for the protection of student information and student personal identifying information.

NOW THEREFORE BE IT RESOLVED BY THE BOARD OF TRUSTEES OF THE TOWN OF ELIZABETH, COLORADO AS FOLLOWS:

SECTION 1. The Board of Trustees hereby adopts Supplement Number 1, attached hereto as Exhibit A, and otherwise entitled Board Conduct with Student Volunteers, Interns, and Student Liaisons.

PASSED, APPROVED, and ADOPTED this \_\_\_\_ day of August 2024, by the Board of Trustees of the Town of Elizabeth, Colorado, on first and final reading, by a vote of \_\_\_\_ in favor of the Resolution and \_\_\_\_ voting against.

\_\_\_\_\_  
Tammy Payne, Mayor

ATTEST:

\_\_\_\_\_  
Michelle M. Oeser, Town Clerk

## SUPPLEMENT NUMBER 1

### TOWN OF ELIZABETH CODE OF CONDUCT FOR ELECTED OFFICIALS (2020 Edition)

#### **Board Conduct with Student Volunteers, Interns, and Student Liaisons**

Student volunteers, interns, and student liaisons provide valuable services to the Town of Elizabeth, as well as gain valuable knowledge of the workings of public government. Through the course of their work for the Town of Elizabeth, they are required to release certain information, such as telephone numbers and email addresses that are private, and for which the Town must ensure such privacy. These students are entitled to not only their constitutional right to privacy from government intrusion, but the privacy of their information is also the responsibility of the Town to protect. The Board of Trustees seeks to limit the disclosure of personal identifying information (PII) through the following means:

**Protection of Personal Identifying Information.** Information such as personal phone numbers, email addresses, the students' home addresses, social media accounts, application materials, and anything else not directly related to the work the students are performing at the Town should be kept private in the students' personnel files and should only be accessible by the administrator of the Student Liaison or Student Internship programs.

**Contact Between the Students, Town Staff, and Town Board of Trustees.** All contact between the students and Town Staff, as well as with the Board of Trustees, shall take place exclusively through official Town channels unless contact via other means is absolutely necessary for the health and safety of the student, or if initiated by the student. Even then, the Staff member of the Trustee in possession of PII should protect it to the greatest extent possible.

**Disclosure of Personal Identifying Information.** Students' PII shall not be shared between Town Staff members, or between Town Staff and the Board of Trustees, unless necessary for execution of the Student Liaison and Student Internship programs or when absolutely necessary to protect the health and safety of the student.