

TEXAS SOUTHERN UNIVERSITY
MANUAL OF ADMINISTRATIVE POLICIES AND PROCEDURES

SECTION: Human Resources
AREA: Employee Relations

NUMBER: 02.05.02

TITLE/SUBJECT: Confidentiality

I. PURPOSE AND SCOPE

The purpose of this document is to outline the university's policy on an employee's obligation to maintain confidentiality with all information entrusted to them within the scope of their employment at the University. The following confidentiality policy has been adopted by Texas Southern University and is applicable to all university employees, including faculty, staff, student workers, contractors/consultants and volunteers, and shall be acknowledged and adhered to by all employees. The Office of Human Resources is responsible for the dissemination and implementation of this policy, and for ensuring that the policy is enforced in a fair and equitable manner.

II. DEFINITIONS

1. University Employee: all individuals (including faculty, staff and student workers) employed to perform duties or services for the University.
2. Volunteer/ Affiliate: an individual or entity that is not directly employed by the University, but is granted access to confidential information for the purpose of performing services for the University. A volunteer or affiliate may be paid or unpaid.
3. Confidential Information includes, but is not limited to: any personally-identifiable student and parent records, financial records (including social security and credit card numbers), and health records; contracts; research data; alumni and donor records; personnel records other than an individual's own personnel records; computer passwords, University proprietary information/data; and any other information for which access, use, or disclosure is not authorized by: a) federal, state, or local law; or b) University policy or operations; other information and records which the employee is directed under proper authority to not disclose. Confidential information does not include information publicly disclosed by the University or which is required to be disclosed pursuant to law or contract.

III. POLICY PROVISIONS

1. At the commencement of new employment, all employees shall affirm their acknowledgment of the Confidentiality policy by reviewing and signing the attached Confidentiality Agreement. Such signed Agreement shall become a part of the employee's permanent employment record.

2. Documents and files (both electronic and hardcopy) containing confidential information are to be accessed, used, and disclosed only with explicit authorization and only on a need-to-know basis for either an employee's job function or volunteer's service.
3. All employees, student workers, and volunteers have a duty to use available physical, technological, and administrative safeguards, in accordance with University policies and procedures, to protect the security of all confidential information in whatever form or medium.
4. Confidential information regarding any individual or entity acquired during the course of employment at, or providing services to, the University must never be divulged to anyone outside of the University without authorization or to anyone within the University without the need-to-know.
5. Based on record retention requirements, documents and files containing information must be disposed of in a way that ensures that the information is no longer recognizable or retrievable.
6. Upon conclusion of an employee's employment or of a student worker or volunteer's service, or upon request of a supervisor, employees, student workers, contractors/consultants and volunteers will return originals and copies of all documents and files (whether electronic or hardcopy) containing confidential information to the University and relinquish all further access to and use of such information.
7. All University employees shall abide by the guidelines established in this Confidentiality Policy. Violations of this policy may result in disciplinary action being taken against the responsible employee, student worker, or volunteer. Disciplinary action may include, but is not limited to, suspension, termination of employment, and/or possible criminal or civil prosecution under federal or state statutes.

IV. REVIEW AND RESPONSIBILITY

Responsible Party: Associate Vice President/CHRO
 Review: Every three years, on or before September 1

APPROVALS

Keisha L. Davis

Responsible Party/Policy Owner

Kenneth Huewitt

Vice President

[Signature]

President

Effective Date 2/1/2018