

HAVERFORD COLLEGE CONFIDENTIALITY POLICY

Supervisors have the option of discussing this Employee Confidentiality Statement at the departmental level, and also the option of asking employees under their supervision to sign the statement. This statement complements existing articulation within employee handbooks relating to privacy of records and confidentiality. <https://www.haverford.edu/human-resources/handbooks-policies>

EMPLOYEE CONFIDENTIALITY STATEMENT

Employees and other individuals (e.g. volunteers or interns) may in the course of their work or activities have access to confidential or personally identifiable information about students, parents, staff, faculty, alumni, donors, volunteers, vendors, and customers. This information is protected by College policy and by law.

Confidential information includes any information that identifies or describes the individual (other than "directory information" for current students who have not limited the release of such information), and includes personnel and academic records as well as FERPA- and HIPAA-protected information. Personally identifiable information (PII) is defined by federal and state laws and includes first and last name (or first initial and last name) in combination with any one of the following: Social Security number; driver's license or state identification card number; EIN, or a financial account, credit or debit card number, with or without any required security code, password or PIN number that would permit account access. This list is not intended as a comprehensive description of current legal standards for PII; for current legal definitions please consult federal and state statutes.

Accessing, using and/or disclosing confidential or personally identifiable information for any reason other than in connection with the legitimate pursuit of the individual's employment or volunteer or intern responsibilities, or in ways that jeopardize the security of such information, constitutes misuse and may be illegal. In addition, employees must respect basic rights of privacy regarding access to all nonpublic data and information and not disclose to anyone except as required for college business purposes.

The College expects that all employees and other individuals covered by this policy will comply with safe computing practices as prescribed by IITS and federal and state laws.

All employees and other individuals covered by this policy are expected to safeguard and refrain from disclosing personal account passwords and other codes that allow access into the College network in accordance with the **IITS Acceptable Use of Information Technology Resources Policy**. Any access to electronic systems containing College data and made using an individual's login and password is that individual's responsibility. If there is a possibility that someone other than the individual has used their login information, the individual is responsible for immediately reporting the circumstances to Instructional & Information Technology Services and requesting a new password. Outside consultants, collaborators, and others who have legitimate need to access College systems should be provided access only with consent of the system administrator, who may require such individuals to sign a confidentiality agreement.

An employee's or other covered individual's access to confidential or personally identifiable information of the College is conditioned upon their acceptance of the obligations described in this Confidentiality Statement. Obligations to protect confidential information continue after termination of an individual's employment or a volunteer's period service. Any misuse or unauthorized release of such information, either during or subsequent to the conclusion of performing work for or activities at Haverford College, may for employees be grounds for legal and/or disciplinary action up to and including discharge from

employment with the College and civil or criminal liability; volunteers and interns similarly may incur civil or criminal liability and may be asked to cease their services to the institution.

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