

ST. FRANCIS CATHOLIC HIGH SCHOOL CONFIDENTIALITY and INFORMATION MANAGEMENT POLICY and PROCEDURES

All personnel, volunteers, independent contractors, and contracted services provided access to confidential information of St. Francis Catholic High School (SFHS) are required to abide by this Confidentiality and Information Management Policy (“the Policy”).

Scope of Protection

All information relating to enrollment, personnel, students, and the solicitation of and receipt of gifts by St. Francis Catholic High School (SFHS) is considered confidential and should be treated as private and proprietary. For purposes of this Policy, this information is collectively referred to as “Confidential Information.”

- Confidential Information should be carefully managed, maintained, and supervised to ensure privacy and confidentiality.
- Databases and the information in them are the sole and exclusive property of SFHS, a private 501(c) organization. Access to and management of that information must be overseen in accordance with SFHS policies, procedures and permissions.
- Confidential Information should not be disclosed, without the advance permission of the President or Principal or his/her designee, to any persons or entities outside of and unrelated to SFHS.

Confidentiality and Information Management Procedures

- Access to SFHS information and documents and to Confidential Information is restricted to authorized SFHS personnel based on a need-to-know basis according to job function. All personnel who may receive Confidential Information must sign this Policy in order to access any SFHS information or database. Access by other persons or agencies is determined by the President or Principal or his/her designee.
- Files (in any form) may not be removed from SFHS offices without the advance approval of the President or Principal or his/her designee. All information must be maintained in cabinets or rooms that are locked when authorized personnel are not in attendance or on password-protected file servers and/or databases.
- Confidential Information in SFHS files will not be released to SFHS volunteers except in the course of regular SFHS business and only with the approval of the President or Principal or his/her designee and on condition that the volunteer signs this Policy.
- Financial and gift information will not be released to non-development personnel or persons or agencies external to SFHS except as necessary to conduct regular SFHS business. Any volunteers authorized to do business on behalf of SFHS may be granted access to financial and gift information (when necessary for completion of the volunteer assignment), as long as the volunteer signs this Policy.
- Names and addresses of students, parents of students, personnel, and donors will not be released to agencies or persons external to SFHS personnel except in the course of regular SFHS business. Under no circumstances will names or addresses be released for mailings not relevant to SFHS business. Independent contractors, contracted services and auditors must guarantee confidentiality of any and all information submitted to them under contract for SFHS work.
- Individuals and organizational representatives may request to see their own individual or organizational files by making an appointment with the appropriate administrative staff person. Persons granted such access will be supervised and will not be allowed to access any other files, copy information, or remove any items from the file.
- New information added to the files must be verifiable and from a reliable source.
- All authorized personnel are responsible for maintaining the confidentiality, orderliness, accuracy, and timeliness of file information.

Persons with access to SFHS Confidential Information are responsible for protecting confidentiality. No information will be disclosed, except as permitted by SFHS Confidentiality and Information Management Policy and Procedures. No personal use will be made of Confidential Information. Authorization for access

to Confidential Information in the files by external agencies or persons can only be granted with the permission of the President or Principal or his/her designee.

In signing this Policy, I acknowledge that I have read and agree to abide by the terms of the St. Francis Catholic High School Statement of Confidentiality and Information Management Policy and Procedures.

For Employees:

Print Name

Title/Office

Signature

Date

For Volunteers:

Print Name

Signature

Date

[Individuals who are both employees and volunteers should sign this Policy in both places]

For Independent Contractor (Coach):

Print Name

Team

Signature

Date

For Contracted Services:

Print Name

Company Name

Signature

Date