Handling Of Confidential Information
BU-PP 029

Policy:
Employees shall not access, acquire, use, copy, transfer or disclose confidential information—including, for example, academic records, compensation, and other financial information—except to the extent necessary to fulfill their employment duties, and shall take all appropriate action, whether by instruction, agreement, or otherwise, to insure the protection, confidentiality, and security of all such information.

Topics:
Donor/Alumni/Constituent information
Student educational records
Employee records
Policy violation

Related policies:
BU-PP 026 — Directory Information Use
BU-PP 027 — Employee Personal Information
BU-PP 705 — Faculty Dismissal Policy
BU-PP 807 — Staff Discipline

Additional information:
None

Contact:
Human Resource Services Office (x2219)
Human Resource Services Records (x8884)

Donor/Alumni/Constituent information —
All donor/alumni/constituent information, whether electronic or print, is confidential. Any printed data must be in secured files or should be shredded when its use is fulfilled. While the donor has the right to request to review any personal information maintained by the University, release to the donor must be accomplished through the appropriate vice president or that person’s designee.

Student educational records —
Access to and disclosure of student educational records is governed by regulations promulgated under the Family Educational Rights and Privacy Act (34 C.F.R. 99.1 et seq.) and by the Directory Information Use policy (BU-PP 026). Generally, any information concerning the educational records of a student cannot be disclosed to any other party without the prior written consent of the student. Specific questions concerning which information about a student may be obtained or disclosed should be directed to the records division in the Office of the Registrar. Improper access to or unauthorized disclosure of confidential information may be a violation of federal law (34 C.F.R. 99.1 et seq.) and could result in, among other things, loss of all federal and state financial assistance to the University.

Financial records—
Baylor employees are only permitted to use covered data (see below for definition) and information when they have an appropriate business need for such information. Covered data and information should be kept in a secure location when it is not being used and all paper copies containing such information should be shredded when its use is fulfilled. All employees should take such additional precautions to keep such information as confidential and secure as reasonably possible.
Covered data and information for the purpose of this policy includes student financial information (defined below) required to be protected under the Gramm Leach Bliley Act (GLB). In addition to this coverage which is required under federal law, Baylor University has decided to also include in this definition any credit card information received in the course of business by the University, whether or not such credit card information is covered by GLB. Covered data and information includes both paper and electronic records.

Student financial information is that information that Baylor University has obtained from a customer in the process of offering a financial product or service, or such information provided to the University by another financial institution. Offering a financial product or service includes offering student loans to students, receiving income tax information from a student’s parent when offering a financial aid package, and other miscellaneous financial services. Examples of student financial information include addresses, phone numbers, bank and credit card account numbers, income and credit histories and Social Security numbers, in both paper and electronic format.

**Employee records —**
Access to and disclosure of employee records are prohibited unless there are legal, medical or employment reasons to do so. Department heads and supervisors may review records during regular business hours. A request from an employee to review his/her records will be granted, but only under the supervision of the Human Resource Services Office. Please see the Directory Information Use policy (BU-PP 026) and the Employee Personal Information policy (BU-PP 027) for details. Employees shall take all appropriate action, whether by instruction, agreement or otherwise, to insure the protection, confidentiality and security of confidential information.

Applicant Information – After a successful faculty search, the department should retain applications, resumes, additional search tools and then contact the General Counsel office for appropriate action of those materials.

Staff Searches - At the conclusion of a successful search, the department should contact the Human Resource Services Office for appropriate action of the search materials, such as applications and resumes.

**Policy violation —**
Employees who violate this policy may be subject to disciplinary action, which could include separation from employment at the University.