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**Confidentiality Statement for**

**McPherson College**

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| McPherson College’s philosophy is to safeguard personal employee information in its possession and to ensure the confidentiality of the information. McPherson College will only collect personal information that is required to pursue its business operations and to comply with government reporting and disclosure requirements. Personal information collected by the company includes employee names, addresses, telephone numbers, e-mail addresses, emergency contact information, EEO data, social security numbers, date of birth, employment eligibility data, benefits plan enrollment information, which may include dependent personal information, and school/college or certification credentials. All pre-employment inquiry information and reference checking records conducted on employees and former employees are maintained in locked, segregated areas and are not used by the college in the course of its business operations.  Personal employee information will be considered confidential and as such will be shared only as required and with those who have a need to have access to such information. Personal employee information will be shared with only those who have a legitimate business need to know. This would also include placing that confidential information on any social media site. All hard copy records will be maintained in locked, secure areas with access limited to those employees, who have a need for such access. Personal employee information used in business system applications will be safeguarded under our college’s proprietary electronic transmission and intranet policies and security systems as outlined in Policy 3.08 Information Technology. Participants in our college’s benefit plans are aware that personal information will be shared with plan providers as required for their claims handling or record keeping needs. Accordingly, those financial services employees, who work with the electronic transfer of college employee personal information while working with our employee benefits plans, should have the appropriate HIPAA release statement assigned to her/his electronic signature.  An example of a HIPAA statement follows:  IMPORTANT NOTICE: The information in this email communication may contain individually identifiable health information that is protected by the federal law, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and other state laws.  As such, it must be treated as confidential and it is intended to be viewed exclusively by the person to whom this email is addressed.  This email contains confidential information that may also be legally privileged.  If you are not the addressee or the person responsible for receiving this email for the intended recipient, you are hereby notified that any use of the contents or any action to inform another of its contents is strictly prohibited.  If you have received this email in error, please provide notification to me at McPherson College by return mail.  Other college information, which may include organizational charts, department titles and staff charts, job titles, department budgets, coding and recording systems, telephone directories, e-mail lists, college facility or location information and addresses, is considered by our college to be proprietary company information to be used for internal purposes only. McPherson College maintains the right to communicate and distribute such company information as it deems necessary to conduct business operations.  If an employee becomes aware of a material breach in maintaining the confidentiality of his or her personal information, the employee should report the incident to Director of Human Resources. The Director of Human Resources has the responsibility to investigate the incident and take corrective action, which could include discipline up to and including termination. Please be aware that a standard of reasonableness will apply in these circumstances. Examples of the release of personal employee information, which will not be considered a breach include, but is not limited the following:   * Release of partial employee birth dates, i.e., day and month is not considered confidential and will be shared with department heads, who elect to recognize employees on such dates. * Personal telephone numbers or e-mail addresses may be distributed to department head in order to facilitate college work schedules or business operations. * Employee identifier information used in salary or budget planning, review processes and for timekeeping purposes will be shared with department heads. * Employee’s company anniversary or service recognition information will be distributed to appropriate department heads periodically. * Employee and dependent information may be distributed in accordance with open enrollment processes for periodic benefit plan changes or periodic benefits statement updates. |

I have read and understand this McPherson College policy.

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(Employee signature followed by employee printing name) (Date)

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(Witness to employee signature) (Date)

1.2013

**Proprietary Information Obligations for McPherson College**

Both during and after your employment you acknowledge your continuing obligations under the Confidentiality Statement for McPherson College not to use or disclose any confidential or proprietary information of the McPherson College without prior written authorization from the Director of Human Resources.

I have read and understand this McPherson College policy.

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(Employee signature followed by employee printing name) (Date)

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(Witness to employee signature) (Date)

9/1/2015