



Confidentiality

Policy Number: HR-6200-120

Policy Title: Confidentiality

Responsible Office: CFO; Human Resources

Policy Owner: Director or Business Office

Revision Date: 07/2017

Purpose and Scope

This policy was established to protect Faculty Members, Staff Members and Students against a breach of privacy and/or confidentiality. Implementation of this policy is the responsibility of the individual supervisor with guidance from the Human Resources Office.

Policy

The University protects the legal rights of Faculty Members, Staff Members and Students, against breach of confidentiality. Such information includes personnel and/or medical record data, salary and benefits information, peer review information, and other confidential statements and/or materials. Unauthorized accessing of records (whether computerized or manual), divulging confidential information regarding a staff member, Faculty Member, or student to an unauthorized third party, using confidential information for personal use, and/or inappropriately removing confidential information from organization premises are strictly prohibited and may result in disciplinary action, up to and including immediate termination. This policy is designed to limit exposure to allegations of breach of privacy and breach of the Faculty and Staff Members duty of confidentiality, as well as to protect the University's reputation.

Definitions

Faculty Member is defined as an individual employed by North American University in a full time or adjunct position who teaches at or in the University. A Faculty Member also is deemed to be exempt under the provisions of the Fair Labor Standards Act (FLSA) and/or applicable state law.

Staff Member is defined as an individual employed in any non-faculty category by North American University, including an individual who is deemed to be either exempt or non-exempt under the provisions of the Fair Labor Standards Act (FLSA) and/or applicable state law.

Student is defined as any person currently enrolled, whether part-time or full-time, in undergraduate or graduate courses or programs. Undergraduate Student denotes any Student who is primarily enrolled in undergraduate courses or program and has not obtained a bachelor's degree in such course of study or program. Graduate student



denotes any Student who is primarily enrolled in graduate courses or program who is working toward a graduate degree or certification after having earned a bachelor's degree.

Procedures

1. At NAU, we feel our duty is to safeguard confidential information arises out of the privacy rights of Faculty, Staff Members, Students, and others with whom there are relationships which impose special obligations. Among the types of information which raise special concern are: personnel transactions, including compensation adjustments, performance evaluations, disciplinary actions, grievance procedures, employment demographic information, employment agreements, benefit plan information; appointment schedules both medical and administrative; telephone access and usage records; security access control logs; student academic records; staff and faculty credentialing; peer review and quality review information; faculty appointment, promotion records; insurance and litigation information.
2. Several offices of the University administer functions that require handling of Faculty Members, Staff Members and Student personal data, including Social Security numbers. Data concerning such personal information can be shared among offices of the University under a strict need-to-know basis. However, any information containing Faculty Members, staff Members and Student personal information can be shared with entities outside the University, including auditors, benefits providers, and governmental agencies, only with the specific approval of the Executive Vice President or the Human Resources Department.

Who Should read this policy:

This policy applies to all eligible Faculty and Staff Members.

Related Documents and References

Employee Handbook

At-will Employment not affected

Notwithstanding anything to the contrary stated in this policy, nothing herein is intended to alter the at-will status of any Staff Member. North American University at all times retains the right to terminate any Staff Member at any time for any lawful reason, or for no reason at all.