

Policy Title: Privacy

Impact:**Responsibility:** Human Resources**Effective Date:** 6/27/2001**Revised Date:****Reviewed Date:****Relates to Procedure(s):****Legal Citation(s):** Idaho State Code 9-340C; 9340E (3, 4); Federal Privacy Act of 1974

It is the policy of North Idaho College to maintain the confidentiality of personal information such as employment information, tax information, school and library records, and medical records to the extent allowed by public information laws.

Information relating to the confidentiality of student records as guided by the federal Family Educational Rights and Privacy Act (FERPA) is found in policy #5.05. The policy and procedures for requesting public records can be found in 2.01.07.

I. Definition of Trusted Agents:

Certain positions at North Idaho College are required to handle personal and confidential information pursuant to statutory or operational requirements (e.g., positions in human resources, financial aid, and others). Employees in these positions are considered trusted agents and are empowered to handle sensitive and personal information. These persons have a responsibility not to carry or share confidential information gained through their job to those who do not have a need to know this information, inside or outside the college.

II. Disclosing Personal Records and Information

Personal records and information will not be disclosed in any cases, except:

1. to those employees and trusted agents who have a need to use the information in the performance of their duties;
2. for statistical research where the "records" have been transferred to a form that is not individually identifiable;
3. for law enforcement purposes as authorized by law where written requests have been obtained from the heads of law enforcement agencies. North Idaho College generally will cooperate with federal, state, and local government agencies investigating an employee if the investigators furnish proper identification and proof of legal authority to investigate. However, the college may first seek advice of legal counsel.

4. with the employee's written consent.

III. The Use of Personal Information

The use of personal information such as parentage, race, religion, sex, height, weight, social security numbers, and tax identification numbers, or other personal information exempt from public disclosure will only be used when required for statutory purposes.

At the time the college requests personal information from employees, job applicants, or other members of the public, the request:

1. will indicate whether the information is mandatory or voluntary;
2. will state the principal purpose (or purposes) for which the requested information is intended as well as giving notification of the routine uses of this information;
3. will notify people of the consequences, if any, of *not* providing the requested information.

IV. Assessing Unauthorized Access to Information

It is the intent to maintain records accurately, completely, and in a timely manner to provide a reasonable assurance of fairness to those who entrust information to us. Procedures affecting the use and disclosure of personal information will be reviewed on a periodic basis to ensure legal compliance. This review will include risk assessments balancing the possibility or probability of unauthorized access or disclosure against the cost of security precautions and the expected effectiveness of the precautions. The results of this review will be reported to the vice president in charge of the applicable section and/or area.

Inspection of Records (Request for Information) (see policy 2.01.7)

Employees have the right to request a list of what records or personal information is maintained about them.

Training

NIC will conduct periodic training of employees to assure they know:

- applicable laws on confidentiality
- NIC's policies and procedures related to confidentiality
- the rationale for protecting confidentiality and the sensitivity of personal information
- the ability to recognize possible breaches and to report them to the proper person

Employee Directory Information

The North Idaho College Employee and Department Directories will only contain that information related to the workplace such as name, title, office location, and office telephone number. No personal information will be included.