



NORTHWESTERN UNIVERSITY

ALUMNI RELATIONS AND DEVELOPMENT

Constituent Information Confidentiality Policy and Agreement

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CONSTITUENT INFORMATION CONFIDENTIALITY POLICY AND AGREEMENT
Alumni Relations and Development

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CONSTITUENT INFORMATION CONFIDENTIALITY POLICY AND AGREEMENT

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Introduction

Northwestern University (NU) Alumni Relations and Development (ARD) maintains and uses constituent information for the purpose of supporting the mission of the University. ARD is committed to the ethical, secure collection and use of information; acceptance of this policy is required for all ARD employees and users of constituent information. Constituent information may only be accessed and used under secure conditions by authorized users.

- Constituent information includes, but is not limited to, information stored in CATracks, ARD's alumni and development information system, and the OnBase document imaging system, as well as the contents of hard copy, digital and filmed files. The use of information about students and alumni collected prior to the individual's graduation (or prior to terminating studies at the University) is governed by Northwestern University's Family Educational Rights and Privacy Act (FERPA) policy (see Appendix 2). The use of protected health information is governed by the Health Insurance Portability and Accountability Act (HIPAA) (see Appendix 3).

This policy establishes parameters and guidelines to allow for the best possible service to those with legitimate needs for the data, while maintaining the confidentiality of the information entrusted to NU.

Applicability and Audience

This policy applies broadly to anyone who is employed by ARD or uses ARD constituent information including:

- Individuals employed by NU ARD in any capacity including student and temporary workers
- Non-ARD University faculty and staff requesting access to constituent information managed or stored by ARD
- Vendors, consultants, volunteers or agents who have access to constituent information
 - Volunteer managers may choose to have their volunteers read and sign either this full Confidentiality Agreement or the Confidentiality Statement for Volunteers.

ARD Data Stewardship

The Executive Director, Alumni Relations and Development Services, is the Data Steward for ARD. Under his or her supervision, individual data stewardship roles, duties or responsibilities may be assigned to staff members who hold responsibility for the day-to-day management, maintenance, security and distribution of constituent information, and who manage compliance with this policy. Staff members who hold such responsibilities include:

- Director, Alumni and Development Enterprise Applications
- Director, Prospect Discovery and Information
- Director, Gift and Record Services
- Manager, Prospect Management
- Manager, Reporting and Analytics
- Manager, IT and Facilities
- Director, Talent Acquisition and Resources
- Other ARD offices that maintain and store constituent information

The ARD Data Steward is the final arbiter of any questions or disputes regarding this policy.

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1. General Policy Statement

- 1.1 Northwestern University (NU) ARD adheres to University, industry, and legal standards in the pursuit of legitimate institutional goals. ARD supports and operates in accordance with the Donor Bill of Rights and the Statement of Ethics (see Appendix 1), industry standards documented by the Council for Advancement and Support of Education (CASE), and Northwestern University's FERPA policy (see Appendix 2).
- 1.2 All constituent information managed by or accessed on behalf of NU ARD is confidential, and is to be used only for the legitimate business and stated mission of Northwestern University, in the course of a work assignment for the University. Unauthorized use of this information is prohibited. Specific gift or financial information may not be disclosed to volunteers; if an exception is needed contact the data steward.
- 1.3 Constituent information may not be used for personal benefit or personal purposes. Further, ARD employees must not allow others to benefit personally from knowledge the ARD employee has attained through legitimate business purposes. Prohibited uses include, but are not limited to, any personal, political, religious or commercial use, as well as any use not directly tied to the business and mission of Northwestern University.
- 1.4 Constituent information is the property of the institution for which it was collected. Northwestern University owned information shall not be given to persons other than those who need it to perform their duties on behalf of Northwestern University. Information about donors and prospective donors is not to be taken to another organization.
- 1.5 ARD materials or information, even that which appear to be public, may not be shared with anyone outside the University without prior approval of the ARD Data Steward or the staff member responsible for stewardship of that information.
- 1.6 Constituent information other than public or directory information (especially that of a private, sensitive or confidential nature) is not to be discussed outside the work environment, and should be discussed within the work environment only as appropriate and necessary.
- 1.7 ARD employees shall seek out and record only information that is relevant to Northwestern University's fund-raising and engagement efforts and/or the cultivation or stewardship of a constituent relationship. Information collection should respect applicable laws and institutional policies. Employees, volunteers or representatives collecting or soliciting information from outside entities on behalf of NU ARD shall be truthful with regard to their identities and purpose, and the identity of Northwestern University during the course of their work.
 - 1.7.1 Public information (see Glossary) that is gathered by NU ARD or is contained in work product (see Glossary) produced by an ARD staff member is proprietary and no longer considered public.
- 1.8 Those with access to constituent information shall not knowingly include or cause to be

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included in any record, report or file a false, inaccurate or misleading document or entry, or use ARD constituent information to generate false, misleading or scurrilous information.

- 1.9** Any violation of this policy and agreement must be immediately reported to one's own supervisor and the ARD Data Steward.
- 1.10** Any negligent or intentional infraction of this policy constitutes grounds for disciplinary action, which may take the form of suspended access, immediate dismissal from employment by the University, or other personnel or legal action.

2. Access and Security

2.1 ARD employees or other individuals requiring access to constituent information, including volunteers and student employees, must:

- Have a signed a copy of this Constituent Information Confidentiality Policy and Agreement (or the Confidentiality Statement for Volunteers) on file with ARD
 - Signed agreements will be kept on file by ARD and will be accessible as needed.
 - All data users will be asked to review the policy and re-sign an ARD confidentiality agreement on a regular basis.
- Have a business need to access the data with approval by their supervisor or sponsor and the ARD Steward

2.2 Information archived in hard copy format (paper files, film, etc.) in ARD repositories is not to be physically removed from the area where it is stored without the express permission of the staff member responsible for stewardship of that information. Information may be reproduced and shared internally only as is warranted and legal; any copies are to be kept secure and used solely to further Northwestern's mission and in the course of a specific work assignment.

2.3 When using electronic means (including, but not limited to e-mail, the Internet or fax) to access or transmit constituent information, this policy requires selection of the most secure and private method of access and transmission and the use of unencrypted wireless networks should be avoided.

- ARD and non-ARD University faculty and staff must use a Northwestern University workstation, with proper security in place: the NU Virtual Private Network if off-campus, Secure File Transfer Protocol (SFTP) or the most secure and private method of access and transmission.
- Volunteers, vendors or agents who need to access constituent information on a non-Northwestern workstation, laptop, tablet or mobile device accept full responsibility for ensuring its security according to contract or good technology practices.

2.4 By submitting a request for constituent information, or by retrieving information directly from any repository managed by or accessed on behalf of ARD, the individual making the request or retrieval accepts responsibility for the information's ultimate use.

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- 2.5** Constituent information is dynamic and it is the responsibility of the data user to ensure the most current data is being used. Any contact data retrieved more than 45 days before its intended use must be refreshed.
- 2.6** All account login information is confidential, including passwords, personal IDs, usernames and access codes. This login information may not be shared with or used by anyone other than the person to whom it is issued. ARD employees and others who have access to constituent information in any form are encouraged to memorize their logins and access information, and not write or record it in any way. Employees who negligently or intentionally make any part of their login information available to others will be held responsible for any resulting misuse of the system by others.
- Individuals may not use an account, password, personal ID, username, access code or other account login information that has not been specifically granted to him or her. Logging on to the University's administrative systems and permitting another individual or entity to access the information is in violation of Illinois law.
- 2.7** Constituent information managed by or accessed on behalf of ARD shall not be deleted, disposed of, or altered without authorization by the Data Steward or the staff member responsible for stewardship of that information. In the event that constituent information (digital or hard copy) must be disposed, it should be destroyed or disposed in a manner that minimizes the danger of a privacy breach. When destroying electronic data, use appropriate data deletion methods to ensure the data cannot be recovered. Paper documents must be shredded.
- 2.8** It is the responsibility of the individual to notify the ARD Help Desk when he/she undergoes a status change of any kind, so that access privileges can be assessed and updated. Supervisors are responsible for ensuring that the ARD Help Desk is notified when a user's access should be disabled.
- 2.9** Access to constituent information managed by ARD may be requested by employees, volunteers or agents of ARD who require it to perform a job function, except where access is restricted to special policies such as those governing medical and student records. This determination will be made by the employee's supervisor **or** the staff member responsible for stewardship of the information in question.
- 2.10** The following items are specific to constituent information accessed by persons or entities outside of ARD. Wherever possible, information shared with any non-ARD entity should be limited to public or directory information.
- Vendors, consultants, student and temporary workers and Northwestern University staff not employed by ARD who require or receive direct or indirect access to constituent information from ARD must sign this agreement before access is granted or constituent information is transmitted to them. Exemptions are granted only by the ARD Data Steward.
 - If an ARD employee requests or retrieves constituent information for use by a non-ARD individual or vendor, the employee is responsible for determining the intended use,

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verifying that the use adheres to this policy, and ensuring that the non-ARD entity receiving the information has a signed Confidentiality Agreement sponsored by an ARD employee on file with ARD.

- ARD employees are encouraged to use confidentiality disclaimers (see Appendix 4) on reports distributed internally or externally.
- Requests for alumna/us information for any commercial or philanthropic purpose not directly connected with or approved by Northwestern University must be denied.
- Constituent information shall only be shared with volunteers or agents of ARD when there is a legitimate need to know, as determined by the ARD sponsor. Exact gift amounts or dates are not to be shared unless specially authorized by the ARD Data Steward. Sharing gift amount ranges is allowed.
- Alumni, friends or other individuals who request personal information, such as an address or telephone number, of an alumna/us should be directed to the directory in *Our Northwestern*: our.northwestern.edu. At the discretion of ARD staff, the contact information for *no more than three (3)* alumni may be disclosed to fellow alumni upon request, provided that a) these alumni have not placed restrictions on the sharing of their information, and b) the information disclosed is directory information only, as defined by Northwestern University's FERPA policy (see Appendix 2).

3. Special Regulations

- 3.1** All ARD employees are responsible for familiarizing themselves with other policies and regulations applicable to their jobs and ARD's business processes. These policies and regulations include, but are not limited to:
- 3.1.1** Northwestern University's policy in compliance with FERPA (see Appendix 2)
 - 3.1.2** Northwestern University Guidelines for Authorization Form - agreement with Northwestern Medical Faculty Foundation regarding procedures in compliance with the Health Insurance Portability and Accountability Act (HIPAA) (see Appendix 3)
- 3.2** By signing the attached agreement, the individual certifies that he/she will treat other applicable policies with the same regard for confidentiality and ethics that is required by this ARD Constituent Information Confidentiality Policy and Agreement.

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Glossary

- 1.11 Access (n.):** Ability to view, enter, retrieve, distribute or use constituent information in any format; must be granted by permission of the staff member responsible for stewardship of that information.
- 1.12 Access (v.):** Viewing, entry, retrieval, distribution or use of constituent information in any format.
- 1.13 Constituent:** Any entity (individual or organization) associated with Northwestern University in any way. Constituents include alumni and students and their relatives, donors, prospective donors, volunteers, members of any group or committee sponsored by Northwestern University, faculty and staff.
- 1.14 Constituent information:** Data, materials or information in any format (hard copy, film/tape, or digital) about any constituent of Northwestern University.
- 1.15 Employee:** Person employed in any capacity and for any length of time by NU ARD, as well as any other individual employed by Northwestern University who may have occasion to access or use constituent information managed by ARD. The definition of “employee” includes, but is not limited to, full- and part-time employees, student workers, temporary employees, and University faculty, staff or administration employed outside ARD. For simplicity, independent contractors and vendors engaged by ARD of the University are included in this category.
- 1.16 Public information** (also referred to as “**directory information**”): NU ARD uses the definition of public information set forth in the University’s policy concerning compliance with the Family Educational Rights and Privacy Act (FERPA) including name, home address and telephone, email address, school or college and class. For more information about FERPA please see the University’s policy (appendix 2).
- This definition is subject to the additional restrictions and guidelines enumerated in this policy, including any additional restrictions or exemptions set forth in applicable University policies (such as those regarding HIPAA).
- 1.17 Volunteer:** Any person, including alumni and students, who may have occasion to access or use constituent information managed by ARD to further the mission of Northwestern University without any compensation, financial or otherwise.
- 1.18 Work product:** Any materials, profiles, reports or lists compiled by ARD employees containing constituent information other than public or directory information. This includes, but is not limited to, professional notes, research or analysis regarding a constituent, and all constituent information compiled by Prospect Discovery and Information, as well as all data stored in the Prospect subsystem of CATracks, the enterprise alumni and development information system. It also includes constituent information downloaded and/or stored on personal computers, laptops, tablets or other devices.

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Appendices

Appendix 1 – CASE Donor Bill of Rights and Statement of Ethics

Documents outlining industry standards, published by the Council for Advancement and Support of Education (CASE).

- Donor Bill of Rights:
http://www.case.org/Samples_Research_and_Tools/Principles_of_Practice/Donor_Bill_of_Rights.html
- Statement of Ethics:
http://www.case.org/Samples_Research_and_Tools/Ethics_Resources_and_Issues/CASE_Statement_of_Ethics.html

Appendix 2 - FERPA

Northwestern University's policy in compliance with the Family Educational Rights and Privacy Act (FERPA)

http://www.registrar.northwestern.edu/academic_records/FERPA_policy.html

Appendix 3 – Northwestern University Guidelines for Authorization Form

Feinberg School of Medicine/NU ARD's agreement with Northwestern Medical Faculty Foundation regarding procedures in compliance with the Health Insurance Portability and Accountability Act (HIPAA).

Please contact Feinberg School of Medicine Development staff for a copy of the policy and agreement form.

Appendix 4 – Confidentiality Disclaimers

Work Product:

This report contains confidential information and is for use by authorized Northwestern University personnel only.

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Confidentiality Agreement Signature Page

I have read and understand Northwestern University Alumni Relations and Development's Constituent Information Confidentiality Policy and agree to abide by it. I understand that the guidelines and standards addressed in this policy apply to me. I understand that any violations of this policy, by myself or others, must be reported immediately, and any violation may be cause for disciplinary action, including dismissal and any other appropriate personnel or legal action.

In addition, I understand that this record will be placed in my ARD user file.

Signature:

Name (Print)

Department (or External Affiliation):

Title:

Date:

To be completed by the supervisor of the above named person. If that person is not an ARD employee, to be completed by the sponsoring ARD staff member.

By signing this agreement, I take full responsibility for the data use of the listed individual.

ARD Supervisor/ARD Sponsor Signature:

Title:

ARD Supervisor/ARD Sponsor Name (Print):

Department:

Date:

Net ID:

Please submit the signed agreement to ard-help@northwestern.edu

For use by the ARD Help Desk:

Received By:

Date Received:

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