



Policy Title: Handling of Confidential Information

Policy Number: BU-PP 029

Date Issued: January 15, 2007

**Responsible Executive: Vice President & Chief
Human Resources Officer**

Date Last Revised: January 13, 2022

Responsible Office: Human Resources

Handling of Confidential Information BU-PP 029

Policy Statement

Employees shall not access, acquire, use, copy, transfer, or disclose confidential information except to the extent necessary to fulfill their employment duties, and shall take all appropriate action, whether by instruction, agreement, or otherwise, to ensure the protection, confidentiality, and security of all such information.

Reason for the Policy

This policy sets forth the rights and responsibilities of Baylor University (“Baylor” or the “University”) faculty and staff in their roles as members of the University community using confidential information.

Individuals/Entities Affected by this Policy

All Baylor University employees

Exclusions

NONE

Related Documents and Forms

University Policies and Documents

[Directory Information Use](#)

[Employee Personal Information](#)

[Privacy Policy](#)

[Faculty Dismissal Policy](#)

[Staff Disciplinary Actions Policy](#)

[Staff Recruitment Policy](#)

[Records Retention and Archival Policy](#)

1. Handling of Confidential Information (BU-PP 029)

Definitions

These definitions apply to terms as they are used in this policy.

Covered data and information	Confidential information includes, but is not limited to, medical, financial, or any personal identification information related to staff, faculty, and students. Covered data and information for the purpose of this policy includes student financial information 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.
Employee Records	Employee Records are official records of the University regarding a prospective, current, or former faculty, staff, or student-employee. Employee Records include Employee Personnel Records, which are Human Resources records, and, for faculty members, the records maintained in the Office of Provost. Employee records also include Payroll Records. Employee records may also include that limited information on an employee which may be maintained by a department head or supervisor in accordance with BU-PP 027, Employee Personal Information .
Student financial information	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.

Contacts

Subject	Contact	Telephone	Office email/web site
Questions	Human Resources	254-710-2000	www.baylor.edu/hr

Responsibilities

Employees	Employees shall keep covered data and information 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. Employees shall take all appropriate action, whether by instruction, agreement or otherwise, to ensure the protection, confidentiality, and security of confidential information.
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Principles

Faculty, staff, and students may have access to both confidential and non-confidential information as part of their day-to-day employment activities. Any information related to faculty, staff, and students is owned by the University and is therefore proprietary. Information should be considered confidential unless otherwise stated. Employees shall

2. Handling of Confidential Information (BU-PP 029)

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 ensure the protection, confidentiality, and security of all such information.

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 in accordance with the [Records Retention and Archival Policy](#). 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](#). 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 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 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 and in coordination with the appropriate Human Resources Consultant. An employee may request a copy of their Employee Records in accordance with [BU-PP 027, Employee Personal Information](#). An employee who wishes to review his/her Employee Records should notify his/her immediate supervisor. The supervisor will then refer the employee to Human Resources. In regards to faculty and staff recruiting related documents, at the conclusion of a successful search, all search related documentation must be returned to HR as outlined in [BUPP 120](#), Section V. Accurate Recordkeeping. Additional policies to consider are the [Directory Information Use Policy](#) and the [Employee Personal Information Policy](#). Employees shall take all appropriate action, whether by instruction, agreement or otherwise, to ensure the protection, confidentiality, and security of confidential information.

Policy Violation

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