Kirkwood
COMMUNITY COLLEGE

College Procedure: 400.2 – Confidential Information

Policy Reference:	400 – Employee Ethics and Conduct
Responsible Department:	Human Resources
Approval Authority:	Cabinet
Procedure Owner:	Vice President, Human Resources and Institutional Effectiveness
Effective Date:	03/07/2018
Version Number:	3
Legal Counsel Reviewed (yes/no):	No
Scope:	College-wide

Reason for Procedure

Kirkwood Community College prohibits the unlawful or unauthorized access, use or disclosure of confidential and proprietary information obtained during the course of employment or other relationship with Kirkwood. This procedure applies to information maintained or transmitted in any form, including verbally, in writing or in any electronic form. The reason for the procedure is to protect confidential information, including but not limited to Kirkwood research projects/programs, confidential employee information, personal health information, confidential student information, proprietary information of Kirkwood and sign-on and password codes for access to Kirkwood computer systems.

The Procedure

Restriction on Access, Use and Disclosure of Confidential Information

Kirkwood limits and restricts access to Confidential Information and computer systems containing confidential information based upon the specific duties and functions of the individual seeking or requiring access. Kirkwood will restrict access to confidential information to the minimum necessary in order to perform individual job functions or duties. Kirkwood will further limit and control access to its computer systems and software with the use of sign-on and password codes issued by the Information Technologies Department to the individual user authorized to have such access.

Kirkwood will control and monitor access to confidential information through management oversight and internal audits. Kirkwood managers and department heads will have the responsibility of educating their respective staff members about this procedure and the restrictions on the access, use and disclosure of Confidential Information, and will monitor compliance with this procedure.

Violation of Confidential Information

Individuals shall not access, use, or disclose Confidential Information in violation of the law or contrary to Kirkwood policies/procedures. Each individual allowed by Kirkwood to have access to confidential

information must maintain and protect against the unauthorized access, use or disclosure of confidential information.

Access, use or disclosure of confidential information in any form verbal, written, or electronic, which is inconsistent with or in violation of this procedure, may result in corrective action up to and including immediate termination of employment.

All Kirkwood employees and others subject to this procedure must report any known or suspected incidents of access, use or disclosure of confidential information in violation of this procedure or in violation of the law to Human Resources.

Revision Log

Table 1 Revision Log

Version Number	Date Approved	Approved by	Description of Change
1	10/19/2011	Jim Choate, Vice President, Finance	New procedure
2	05/09/2017	Mick Starcevich, President	New template
3	07/09/2019	Cabinet	Procedure template