

SPRINGFIELD COLLEGE

EMPLOYEE CONFIDENTIALITY POLICY

I. Purpose:

In accordance with the trust placed in its employees by Springfield College (“College”) and the members of the College community, all College employees are responsible for maintaining the confidentiality of the sensitive data with which they work, including but not limited to personally confidential information about individuals who study or work at the College.

II. Scope:

This Employee Confidentiality Policy (“Policy”) applies to all employees, including graduate fellows and associates and student employees (“Employee”).

III. College Policy:

The College maintains strict confidentiality and security of its records, whether in electronic form, hard copy, or otherwise, in compliance with applicable federal and state laws. These laws pertain to the security and privacy of all records that contain information that identifies or could lead to the identification of an employee, student, or other member of the College community, that could reveal private information concerning an employee, student, other member of the College community, or that involves confidential and proprietary information about the College’s operations.

As a condition of employment and to the extent necessary to perform their duties, Employees are authorized to access such information. Employees of the College are required to: i) protect against unauthorized access to this information; ii) ensure the security and privacy of such information; and, iii) disclose any anticipated or actual threats or hazards to such information. Employees must take precautions to not share this information with another member of the College community, the public, or other Employees who are not authorized to view this information.

Any questions regarding the release of such information to another person should be directed to the Employee’s supervisor.

IV. Unauthorized Access, Release and/or Use of Private/Confidential Information:

Unauthorized access, release, and/or use of private and/or confidential information is strictly prohibited. Employees shall immediately report any known or suspected breaches to their supervisor, who will in turn promptly notify the College’s Internal Auditor or Vice President & General Counsel.

Examples of unauthorized access, release and/or use include, but are not limited to, the following:

- Access to student, employee or College information not necessary to carry out an Employee’s job responsibilities.
- Accessing the student or employment records of an Employee’s children, spouse, parent or relative, as well as friends who attend the College, for non-business-related reasons and outside the scope of the Employee’s job responsibilities.

- Release of student or employee information to unauthorized internal or external users, whether intentional or unintentional.
- Release of student or employee information to an authorized individual/agency that exceeds the stated purpose of an approved or authorized request.
- Disclosure of an Employee’s access credentials and/or passwords to an unauthorized individual.

V. Effective Date / Violations of this Policy:

This Policy shall remain in effect indefinitely, regardless of an Employee’s current or future employment status with the College. The College may at any time revoke an individual’s access or other authorization to confidential or sensitive information. Additionally, the failure to comply with College policies or applicable laws and regulations regarding the use and safeguarding of confidential and sensitive information may result in disciplinary action, including termination of employment. Criminal or civil penalties may also be imposed, depending upon the nature and severity of the breach of confidentiality.

VI. Responsible Parties/Contacts:

Questions regarding this Policy should be directed to:

Linda (Elle) Morgan, Esq.
 Vice President & General Counsel
 Marsh Memorial
 PH: 413-748-3271
ellemorgan@springfieldcollege.edu

Katherine O’Connor
 Internal Auditor
 Administration Building
 PH: 413-748-3640
koconnor3@springfieldcollege.edu

Approved by: President & President’s Leadership Team
 Date Adopted: September 11, 2018
 Date Effective: October 1, 2018

Administrative Revisions: December 6, 2019 (updated contact information)