

Western University - Western Advancement Western Staff Confidentiality and Non-Disclosure Guidelines

Western University ("University") has a legal and ethical responsibility to protect and respect the confidentiality of personal, educational, and financial and fundraising information of its students, alumni, faculty, staff and donors.

You have been provided with access to confidential information as needed for your role with Western University. This information must be maintained in the strictest confidence as outlined in the signed and returned *Request for Access to CRM, Luminate Systems and Data* form. This agreement acknowledges your responsibility to maintain this confidentiality.

Information includes identifiable information such as names, contact information, age, gender, marital status. It also includes educational, financial, or employment details, as well as facts about, or related to, a constituent.

When using data, always follow these guidelines to ensure accuracy, confidentiality, and compliance:

Confirm Constituent Identity

- With over 850,000 constituent records, many will have the same or similar names and details.
- Always verify you are viewing the correct constituent by cross-checking identifiers such as:
 - Full name, Alternate names (Alias, Maiden)
 - Age
 - Contact information – email, mailing address, phone, employment information, social media accounts
 - Affiliation details – graduation year, graduation faculty, degree
 - Relationship information - affiliation to the institution, individual or organization relationships

Do Not Disclose or Release Information

- Do not disclose, release or publish any information without the explicit consent of the constituent. Example: Publishing educational information in a magazine or online article.
- Financial/fundraising information is strictly confidential.
 - Do not share financial or fundraising details, even with the constituent or constituent's family.
 - *Advancement Operations* is the only authoritative source for fundraising information. They are responsible for confirming/approving the release of financial details (totals/balances, intended use, details, etc.).
- Educational information is strictly confidential.
 - Do not share educational details, even with the constituent or constituent's family.
 - The *Office of the Registrar* is the only authoritative source for educational information. They are responsible for confirming/approving the release of educational details (graduation year, faculty of graduation, degree, area of study, etc.).

Review Communication Preferences

- Check solicit codes and preferences before initiating contact to ensure constituent is open to engagement with Western and Western Advancement.
- Some solicit codes are intended for mass communication vs one to one contact, please review and consider contact accordingly.
- Respect opt-outs and restrictions on communication channels (email, phone, mail).
- *Sensitive Circumstances – Do not contact* codes are to be explicitly adhered to.
- *Anonymous* codes are to be explicitly adhered to and respected.

General Best Practices

- Report any suspected data breaches or access issues immediately.
- Never print, screenshot or export data unless authorized or required for your role.
- Provide relevant details back to Advancement Operations especially changes to contact details (email, address etc.) as well as communication preference, if no contact is requested or concerns are expressed.
- Confidential information must only be retained for as long as needed for your role. When no longer needed, data stored outside of the system must be securely deleted.

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- When access to the systems and data is no longer needed, communicate with Advancement Operations to remove access.
- Do not store confidential data on personal devices.

Consequences: reputational risk, loss or damage to the University/constituent relationship, privacy violations.

If, in the course of your duties any questions are raised as to why you have access to this information, the above guidelines can be communicated. As a staff member of the University, you can confirm:

- That a binding *Confidentiality and Non-Disclosure Agreement* has been signed and stored with the Western Advancement office of Western University.
- Data is used with the utmost discretion, respect, and in the strictest of confidences.
- You will not at any time during or after your employment, disclose or communicate any information.
- You will not keep copies of any information and will not transfer documents containing information via any method of delivery without authorization from the University to do so.
- Information to which you have access, is to be used only for your role on behalf of the University and not for personal, commercial, political or any other purposes.