



## ADMINISTRATIVE DIRECTIVE

Title: Confidential Information
Issuing Department: Human Resources
Effective Date: June 1, 2018
Approved: Jamsheed Mehta, Town Manager
Type of Action: Original Release

### 1.0 PURPOSE

This directive is intended to provide Town of Marana employees with a basic understanding of their responsibilities to protect and safeguard the confidential information they have access to as a result of their employment.

### 2.0 DEPARTMENTS AFFECTED

All Town of Marana departments and employees.

### 3.0 REFERENCES

- 3.1 Town of Marana Personnel Policies and Procedures, Policy 1-2: Code of Ethics, Section 1-2-6: Confidentiality
- 3.2 Town of Marana Personnel Policies and Procedures, Policy 5-4: Use of Communications Systems and Equipment, Section 5-4-3: Prohibited Use
- 3.3 Town of Marana Personnel Policies and Procedures, Policy 5-5: Discipline System, Section 5-5-5: Grounds For Disciplinary Action

### 4.0 DEFINITIONS

- 4.1 Confidential information: Information disclosed to an individual employee or known to that employee as a consequence of the employee's employment at the Town, and not generally known outside the Town, or information that is made confidential by law or policy.
  - 4.1.1 Examples of "confidential information" include but are not limited to, social security numbers; payroll and personnel records; health information; credit card information; passwords and other information related to Town network access and security; financial statements; budget documents; and tax information. Individual departments, divisions, or programs may have additional types or kinds of information that are considered "confidential information" and are covered by this directive.

- 4.1.2 “Confidential information” includes information in any form or format, including written documents or records and electronic data.

## 5.0 POLICIES AND PROCEDURES

- 5.1 Compliance with Laws and Policies. Employees granted access to confidential information must comply with all applicable state and federal laws and Town policies relating to access, use, and disclosure of confidential information.
- 5.2 Use of Confidential Information. Both during and after Town employment, an employee shall hold all confidential information in trust and confidence, and will only use, access, store, or disclose confidential information, directly or indirectly, as appropriate in the performance of the employee’s duties for the Town.
  - 5.2.1 An employee shall not seek to obtain any confidential information involving any matter which does not involve or relate to the employee’s job duties.
  - 5.2.2 Browsing confidential information without a valid business reason is strictly prohibited.
- 5.3 Removal of Materials/Property
  - 5.3.1 An employee will not remove materials or property containing confidential information from the employee’s department or work area unless it is necessary in the performance of the employee’s job duties.
  - 5.3.2 If materials or property containing confidential information are removed from the Town’s facilities, the employee must safeguard the materials/property and control access as necessary.
- 5.4 Miscellaneous Rules
  - 5.4.1 All removable media or printouts containing confidential information must be secured when not in use and after normal business hours in a locked drawer or cabinet.
  - 5.4.2 During use, confidential information must be protected so that it is not visible to members of the public or anyone without a business need for the information.
  - 5.4.3 Confidential information must not be left visible on a computer screen so that it might be viewed by anyone who might not otherwise have access to such information.
  - 5.4.4 Materials containing confidential information shall be destroyed by disposal in the Town’s secure shredding bins.
  - 5.4.5 To protect confidential information being sent electronically to permissible third parties, a secure email connection or secure FTP must be established.
- 5.5 Acknowledgement. All Town employees will be required to sign a confidentiality acknowledgement provided by the Human Resources Department acknowledging their responsibilities under this directive or other Town confidentiality or privacy policies, or federal or state confidentiality or privacy laws. Refusal to sign the confidentiality agreement is grounds for disciplinary action, up to and including termination.

5.6 Emergencies. In a health or safety emergency, relevant confidential information may be disclosed as necessary to appropriate individuals, such as law enforcement officials, a counselor, or a supervisor.

## 6.0 RESPONSIBILITIES

6.1 It is the responsibility of every employee to respect and maintain the security and confidentiality of confidential information.

6.2 If an employee has any question relating to appropriate use or disclosure of confidential information, the employee shall consult with the employee's supervisor, the Legal Department, or other appropriate Town personnel.

6.3 Each employee must promptly report to the employee's supervisor any known violation of this directive, other Town confidentiality or privacy policies, or federal or state confidentiality or privacy laws.

## 7.0 ATTACHMENTS

[Reserved]

**REVISION HISTORY**

<i>REV</i>	<i>DESCRIPTION OF CHANGE</i>	<i>DATE</i>
<b>OR</b>	Original Release	6/1/2018

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