



# Policy

**Policy Title:** Culture of Confidentiality and Discretion

**Number:**A4600

**Policy Type:** Administrative

**Responsible:** CHRO; Executive Director, Human Resources

**Related Policies:** [B3001](#), [B3002](#), [B3003](#), A1100, [A1200](#), A4000, A4100, A4200, A4300, A4400, A4600, A4700, A4900

**Linked Operating Standards:** A4000.10, [A4000.20](#), [A4000.25](#), [A4200.15](#), A4900.05

**Related Laws:** [Title IV](#), [Title VI](#), [Title VII](#), [Title IX](#), [VAWA](#), [110 ILCS 155](#), [740 ILCS 24](#)  
[Family Educational Rights & Privacy Act](#) (20 U.S.C. § 1232g; 34 CFR Part 99)

**Related External Standards:** None

**HLC Criterion:** 1C

## **Policy Statement**

The College believes a culture of confidentiality and discretion is essential for building trust, fostering accountability, guiding ethical behavior, shaping perceptions of organizational integrity, and safeguarding its reputation. As such, the College will ensure that all information, including academic records, personal data, financial information, health records, and any other sensitive materials, is kept private, securely protected, and handled responsibly. By upholding these principles, the College will protect the interests of all individuals, maintain the highest standards of professional conduct, and nurture an environment where everyone can thrive academically, personally, and professionally.

To encourage confidentiality and discretion, the College will:

1. Communicate our operating standards (i.e., processes, procedures, decision-making guidelines) in ways that are easy to understand and readily available for all stakeholders;
2. Provide our employees with training on the importance of confidentiality, proper handling of sensitive information, relevant legal requirements, parameters for disclosure, and best practices;
3. Model discretionary behavior when handling sensitive information;
4. Provide a safe environment for the reporting of breaches;
5. Implement, and regularly update, technical safeguards using encryption, secure passwords, and access controls;
6. Implement security protocols that ensure only authorized individuals have access to confidential data;
7. Promote an environment where confidentiality and discretion is seen as a shared responsibility;
8. Inspire personal accountability by providing tools and resources to help individuals manage their data effectively.

To further support confidentiality and discretion, employees will:

1. Avoid sharing unnecessary details or engaging in personal conversations about confidential matters;
2. Share information only with individuals who have a legitimate need to know to fulfill their professional responsibilities;
3. Exercise caution when posting on social media or making public statements to not intentionally, allude to, or inadvertently disclose confidential information.

To those ends, the College's CHRO is directed to collaborate with the Senior Leadership Team to develop, implement, and continuously improve systems, processes, and practices aimed at ensuring sensitive information is protected in accordance with all legal requirements and ethical standards.

<b>Change Log</b>		<b>Governance Unit: Diversity, Equity, Inclusion, &amp; Belonging Council</b>	
<b>Date</b>	<b>Description of Change</b>		
9.26.24	Initial Adoption		