

Policy: Confidentiality

Policy Title	Confidentiality
Responsible Dept	Office of the President
Content Owner	Susan Katz Froning

Philosophy

The Foundation recognizes, respects, and is firmly committed to protecting employees' and grantees' privacy rights and interests with respect to personal, financial and/or confidential information. In the conduct of our business, the Foundation makes every effort to prevent inappropriate or unnecessary disclosures regarding any employee's or grantees' personal, financial, or otherwise confidential information.

Policy

The Foundation's operations require that a strict code of confidentiality of information be maintained. No employee will store information, without permission, outside of the Foundation (either in written or electronic form) about any matter pertaining to the conduct of the Foundation's operations. No information regarding grants or prospective grants to one grantee or prospective grantee shall be given, without authorization, to another grantee or prospective grantee.

Likewise, conversations regarding rumors, problems, gossip, etc. about employees, grantees or prospective grantees are not acceptable. In addition, any employee engaged in or responsible for idle gossip or dissemination of confidential information within the Foundation, such as personal information, financial information, etc. will be subject to disciplinary action. Lack of discretion in these matters is looked upon as a very serious matter. Any employee failing to abide by this policy will be subject to disciplinary action including immediate termination of employment.

Procedures

REPORTING BREACHES OF CONFIDENTIALITY:

Any time an employee has a concern regarding the propriety or legality of any action taken or proposed by the Foundation or any employee, the employee should promptly report concerns to his/her immediate supervisor, the Deputy Director, Human Resources and/or the Corporate Secretary/General Counsel.

If an employee feels uncomfortable reporting to any of the above, they should disclose their concerns to the President/CEO.

Reports may be submitted in writing or verbally, but reports should contain enough information to substantiate the concern and to allow an investigation to begin. Reports may be submitted anonymously. All reports will be received and acted upon in confidence to the extent possible,

consistent with the need to investigate.

Upon receipt of a complaint, the Deputy Director, Human Resources and the Corporate Secretary/General Counsel will consult with each other as to the appropriate next steps for an investigation into the complaint. They will also consult the Senior Vice President/CFO & Treasurer and Internal Audit as appropriate.

Upon completion of the investigation, the Foundation will take such action as it deems justified under the circumstances. Any action taken will be reported to the Corporate Secretary/General Counsel.

If management is not responsive to a concern, employees may report their concerns directly to the Chair of the Audit Committee of the Board of Trustees.

NO RETALIATION

If an employee believes he/she has been retaliated against for filing a "good faith" report or cooperating with an investigation, the employee should immediately report such concern to the Deputy Director, Human Resources, and/or Corporate Secretary/General Counsel.

The Foundation will investigate promptly any complaint of retaliatory or other improper behavior. Complaints and investigations will be handled in a confidential manner, consistent with any corrective action that needs to be taken by the Foundation. The procedure outlined above will be followed.

COMPLIANCE OFFICER:

The Corporate Secretary/General Counsel is ultimately responsible for enforcing the Confidentiality, Code of Ethics and Conduct and related policies. If any employee has a concern about the policies, they should direct such concerns to the Corporate Secretary/General Counsel.

Tools
(Checklists, Forms)

References
(Guidelines, Other)

Training Modules
(How To)

Applies To - Region All Offices

Applies To - Personnel Type All Staff

Exceptions

Who to Call

Legal Reason

Executive Council Approved

Related Policies Disclaimer
Code of Ethics and Conduct