



Development and Alumni Relations Policy on Confidentiality and Sharing of Constituent Information

Subject: Protecting constituent information while advancing DAR's work

Date Issued: 8/01/2015

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Review Date: 7/01/2019

Applies To: All Departments of Grinnell College and External constituents

Issued By: Vice President for Development and Alumni Relations

The College benefits greatly from the use of faculty, staff, students and volunteers in engaging constituents. Alumni, parents, and friends of the College also benefit by staying in contact with each other. We value all of these individuals and the service and connections they provide to the College. We strive to maintain a trustful relationship in which the individuals and the constituent can be confident that private information will not be shared with an inappropriate audience. Implementing a written policy ensures that the constituent can trust the College with confidential information. This policy establishes the Development and Alumni Relations ("DAR") definition for various audiences and the types of information that may and may not be shared with each of them.

When sharing information with faculty, staff, students, and volunteers, DAR professionals should provide a copy of this policy out of respect for the constituent's right to privacy. Prior to sharing confidential information, this document must be read and agreed to by returning a signed copy to our office (check the volunteer tab of Raiser's Edge to determine if a signed copy is already on file). **All confidential information shared with faculty, staff, students and volunteers, should be destroyed after he/she/zi is finished using it for the specified purpose.**

Definitions

A volunteer is defined as an individual who dedicates their time to advance the development and alumni relations efforts of Grinnell College. Volunteers are not directly paid for their service to the College.

Faculty/staff includes all Grinnell College part-time, full-time, senior faculty status, emeritus or retired faculty, and current or retired staff members.

Students includes all Grinnell College part-time and full-time students.

DAR professionals are included under the category of staff of Grinnell College. DAR staff will have the greatest access to confidential information due to the nature of their work.

Donors include all constituent types of alumni, parents, friends (including faculty/staff and students), corporations, foundations, and any other past, present, or future donors or any other category for which there is constituent information in the DAR database.

Constituent information, consists of all data contained in an electronic or printed constituent record. Data is obtained by constituents sharing information with the College and by the College gathering information through public and voluntary sources.

Executive Officers of the College include the Board of Trustees, the President of the College, the Dean of the College, and the vice-presidents. Executive officers may have the same access to constituent information as DAR employees.

Public data refers to information that can be released to the public with little or no risk to the College and includes name, degree, and graduation year. Public data is most often already accessible through publically available means, such as Grinnell College yearbooks or LinkedIn.

Personal data is made available to alumni, students, faculty, and staff within our online directory – this can include but is not limited to phone, email, address, and employment. Although this information is shared within our community, it is protected behind a firewall and requires a password to gain access. At any point a constituent can instruct our office to block them from directory, or apply a “Do Not Release” to their record which will block them from the directory and all other methods of outreach. At any point the DAR office can remove individual access to the directory.

Confidential data consists of data whose unauthorized disclosure may have serious adverse effect on the College’s and/or the individual’s reputation, resources, or services. This includes data protected under federal or state regulations and data that must be kept private due to proprietary, ethical, strategic or privacy considerations, such as giving history or documentation of conversations with a constituent. The DAR office will never share confidential data unless there is express intent to advance a business purpose or a legally mandated requirement.

Reasons to share donor information with faculty, staff, students and volunteers

Faculty, staff, students and volunteers with the College often assist with the following tasks:

- Screening lists of constituent information related to current and prospective donors.
- Hosting or attending events and engaging certain guests in order to advance the College’s relationship with that guest.
- Attendance at meetings with the constituents, either one-on-one or with a DAR professional, as a way to further the relationship between the College and the constituent.
- Assistance with creating strategy for engaging a potential donor.
- Constituent stewardship

Sharing of Information

On a need to know basis, DAR may choose to confidentially provide confidential or public/personal data to faculty, staff, students and volunteers in an effort to support constituent engagement. Constituent information that may be shared includes:

- Constituent identification number, as it appears on all alumni solicitation pieces
- Constituent name
- Grinnell College and non Grinnell College degrees, including college, campus, major and year of graduation.
- Home address, for the purpose of identifying prospects and social connections based on neighborhood or community.
- Job title, business affiliation, and business address, both current and former.
- Names and ages of spouses and children, including family trees created by DAR professionals
- Phone number and/or email address, for the purposes of constituent cultivation, solicitation, stewardship or the planning and active marketing of a College event.
- Status as donors or non-donors to Grinnell College and historic and current Volunteer roles of the College.
- Annual and Lifetime giving, pledge commitments and planned gifts.
- Future gift strategies and solicitations.
- Details of gift agreements or documented planned/estate gifts.
- Financial data and analysis, including documents containing financial data created by research staff and prospect ratings.

Confidential and highly confidential constituent information that may not be shared with faculty, staff, students, and volunteers includes:

- Anonymous amounts given to Grinnell College.
- Written reports of constituents' contact with DAR professionals and other strategy discussions concerning the donor.
- Any information that we have been asked not to share, unless withholding that information would be detrimental to the health and wellbeing of a constituent(s) and the College (*this applies to all staff, including DAR staff*).
 - In Raiser's Edge, there will be an indication that the donor has highly confidential information on file. The indication will be on the attribute tab and it will show as *Confidential Info on File from Prospect*. The actual confidential information is kept under lock and key by the Data and Records Assistant. A member of the DAR staff may request to view the highly confidential information, but permission must be granted by the Vice President for DAR. Permission must be in writing. Staff may view the material in the presence of the Data and Records Assistant and must not remove from the file room for any purpose.
- Any information that doesn't serve to fulfill a business purpose.
- **Please note that DAR does not store Social Security Numbers, and thus, SSN's cannot be shared

When constituent information is sent to faculty, staff, students or a volunteer, the sender should make every effort to emphasize that the content of the e-mail, fax, or printed documents are confidential in nature and are not to be shared with audiences for whom the information is not intended. E-mail communications should be marked "confidential" in both the subject line of an e-mail and the body of the e-mail. Attachments should clearly be marked "confidential – do not share" in the body of the document attached. Proper disposal of confidential information includes manual and electronic shredding or return of information to the Office of DAR.

Request from lay-persons and organizations to release personal information

Forward Requests

If an individual or organization contacts our office requesting release of someone else's personal information, we will forward on the request to the individual, notifying them of the request, identifying the party(ies) that originated the request, and allowing the individual to determine on their own, if and how they would like to respond.

Confirming Degrees

Requests from prospective employers and others should be directed to the Office of the Registrar.

Law Enforcement Agencies

Requests from law enforcement agencies for constituent information should be directed to the Office of the President.

Subpoena or Court Order

Information will be released pursuant to court order or a lawfully issued subpoena. Questions regarding court orders and subpoenas should be directed to the Office of the President.

Tracking Signed Agreements

The preferred method for receiving signed agreements is via electronic submission of the form found @ <http://alumni.grinnell.edu/confidentialityagreement>.

For those unable to submit the online form, a signed confidentiality agreement can be submitted to DAR's Data and Records Assistant by:

1. emailing a scanned copy or photo of the signed document to Raisersedge@grinnell.edu
2. faxing the signed document to our office 641/269-4313
3. postal-mailing the signed document to:

Grinnell College
Development and Alumni Relations
733 Broad Street
Grinnell, IA 50112.

Upon receipt of a signed confidentiality document, the volunteer job assignment of "Signed Confidentiality Agreement" will be added to the corresponding Raiser's Edge record, noting the date of the signed document. The signed copy will reside in the person's individual file.



DEVELOPMENT AND ALUMNI RELATIONS

**FACULTY, STAFF, STUDENTS AND VOLUNTEER
CONFIDENTIALITY/ NON-DISCLOSURE STATEMENT**

In performing their duties on behalf of Grinnell College, DAR provides students, faculty, staff, and volunteers with confidential information about alumni, parents, students, friends and business/corporations. Due to the sensitive nature of constituent information, the “Policy on Confidentiality and Sharing of Constituent Information” must be read and agreed to prior to the release of any confidential information. Confidential constituent information must not be discussed with others. Not all confidential information can be released from the DAR office. Proper disposal of confidential information includes manual and electronic shredding or by returning the information to the Office of Development and Alumni Relations.

My signature below indicates my understanding of and agreement to comply with the Development and Alumni Relations Policy on Confidentiality and Sharing of Constituent Information.

Name (Print) _____ Signature _____ Date _____

Class Year (if Applicable) _____

Faculty/Staff/Volunteer Position (if applicable) _____

Questions regarding confidential information or to return the signed confidentiality document:

raisersedge@grinnell.edu

Grinnell College
Office of Development and Alumni Relations
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Grinnell, Iowa 50112

866/850-1846