

**PORTLAND STATE UNIVERSITY
CONFIDENTIALITY and INFORMATION MANAGEMENT
POLICY and PROCEDURES**

Confidentiality and Information Management Policy

Information contained in the alumni and donor database and all files relating to the solicitation of gifts are the property of Portland State University. All information in the files, database and in reports generated from the database is considered confidential and proprietary to Portland State University and will be referred to in the rest of this document as “Confidential University Information.” Database records, documents, and reports which are created or received by the Office of University Development at PSU will be carefully managed, maintained and supervised to ensure privacy and confidentiality.

As used in document, the term “Confidential Information” means: (1) propriety information of PSU or the PSU Foundation; (2) information marked or designed by PSU or the PSU Foundation as confidential; (3) information, whether in written form and whether designated as confidential, which is known to me as being treated by PSU as confidential; and (4) information provided to PSU or the PSU Foundation by third parties which PSU or the PSU Foundation is obligated to keep confidential. Confidential Information includes, but is not limited to, names, ideas, discoveries, giving histories, prospect research and profiles, briefings, database reports, compilations of information, as well as financial, demographic or other information in printed and electronic formats

Confidentiality and Information Management Procedures

Information Access

Access to proprietary and confidential information managed by the Office of University Development is restricted to staff and volunteers who require such information to perform their job duties. Approval for access to university files and the alumni & donor database is granted at the discretion of the Portland State University Vice President of University Relations and only upon the employee’s agreement to the University’s confidentiality agreement and policies and procedures noted herein. Additional access requirements and confidentiality agreements may also be required by the PSU Foundation.

Persons granted access must subscribe to the ethics statements of the Council for the Advancement and Support of Education (CASE) and the Association of Prospect Researchers for Advancement (APRA), and agree to the tenets of the CASE Donor Bill of Rights. Each person must sign a statement of confidentiality, which includes an agreement to abide by the guidelines set forth in the documents named above and to follow the procedures stated in this document to protect privacy and confidentiality. Persons who have signed the confidentiality statement are considered “authorized personnel”.

Statement of Confidentiality

Each document or report generated or received will have its confidentiality indicated in one of

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several ways before being filed or shared with other authorized personnel. For documents containing personal or financial information such as profiles and gift agreements, a header marked CONFIDENTIAL must be incorporated into all pages of the document. The watermark or stamp must be readily visible and the header or stamp placed on the bottom right corner of each page of the document or report to ensure visibility. Examples of what requires a confidential watermark or stamp include but are not limited to:

- Prospect research profiles
- Presidential/university briefings
- Financial information
- Wills and bequests
- Anonymous information
- Other materials as deemed appropriate by prospect research and management staff

Security Procedures

PSU Office of University Development, PSU Foundation

Access to confidential Portland State University files & information is limited to authorized personnel as defined in this document.

Access to the alumni & donor database is by assigned password only to persons approved by the PSU Vice President of University Relations. Passwords may not be shared and each person with access is assigned a personal password. Staff may not leave their computers unattended with alumni and donor database accessible on the screen. Access to confidential, private and financial information in the database is restricted on a screen-by-screen basis to staff according to the information needed for the performance of their duties. Reports and data may be used for general purposes and uses of the Portland State University development and alumni offices and their related work.

Central files may only be checked out from the Offices of University Development by PSU authorized personnel who have a signed Confidentiality Agreement on file. When a file is removed from the cabinets, an “out” card will be put in its place. The “out” card is then signed by the person removing the file and the date it’s checked out indicated. When the file is returned, the out card is removed. The person borrowing the file is responsible for returning it to prospect research and management staff, who will re-file. Files should be returned to research and management staff within a reasonable amount of time.

To facilitate information access to authorized personnel, University development prospect and donor files will be kept in the Office of University Development in file cabinets with individual locks. The room and cabinets will be kept under the direct supervision of the prospect research and management staff and locked at all times. If the room and/or cabinets are locked during business hours, keys to both the filing cabinets and room will be available from research staff or the PSU Director of University Development. The files may be viewed only by those whose assigned tasks

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require such access and who have signed a confidentiality statement.

Other Staff

Information in the files or database will not be released to individuals internal to PSU except in the course of regular Development, Alumni or Foundation-related business. Staff not employed by the PSU Offices of University Development and Alumni Relations, the PSU Foundation, and PSU schools and related units will be granted access to information on a case-by-case basis by the PSU Vice President of University Relations. Only information obtained from public sources or that is approved by the individual or organization mentioned in the requested data may be released to PSU staff without authorized access to the files or database. If confidential information must be shared for the completion of assigned tasks and is not available otherwise, the individual requesting the information must sign a statement of confidentiality.

External Constituents

Only information obtained from public sources or that has been approved by the individual or organization mentioned in the requested data may be released to sources external to PSU. Under no circumstances will financial or gift information be released to anyone other than authorized personnel without permission from the person or organization involved.

Volunteers

Office of University Development or Alumni Relations or related volunteers may have access only to confidential information relevant to their assigned tasks and only as it is managed by a university employee who has signed a confidentiality statement. Relevant information does not include giving or financial information that is not publicly available.

Individual and Organizational Files

Individuals may request to see their own files or alumni & donor database record by making an appointment with the PSU Vice President of University Relations. Organizational executives may see the files or database records of their organizations by going through the same process. At no time may these persons view a file or the database unattended, have access to other individual or organizational files, make copies of any materials in the file or database or remove any information from the file or database. If an individual or corporate representative objects to material in a file, the Research Manager may remove it and dispose of it by shredding. Research staff may also delete objectionable information from the database.

External Agencies

To protect privacy, names and addresses in the files or database will not be released to agencies external to PSU except in the course of regular Office of University Development and Alumni Relations or PSU Foundation business as noted in the next paragraph. Under no circumstances will names be released for mass mailings outside of PSU without prior written approval of the Vice President.

Information may be provided to outside vendors by Office of University Development, and/or Alumni Office in the course of doing their regular business. The vendor must have a clause

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guaranteeing confidentiality in its contract with PSU. Enforcement of its confidentiality clause is the responsibility of the vendor as stated in the PSU confidentiality statement and with the approval of the PSU Vice President of University Relations.

File and Database Maintenance

It is the responsibility of all PSU development-related staff with access to confidential university information to include only information that is directly relevant to PSU Development and Foundation work in the database or file. Prospect research and management staff will help maintain the accuracy and timeliness of the files by removing duplicate items and unnecessary or irrelevant information. Staff using the database will promptly notify the PSU Foundation Demographics Coordinator of errors, changes and outdated information. New information added to files or database must be verifiable and come from a reliable and noted source. If there is a question about the appropriateness, accuracy or timeliness of information, PSU research and management staff will make a decision about inclusion or disposal of the data. All hard-copy documents or reports removed from files or no longer needed by the Foundation or Development staff will be disposed of by shredding.

Documents to be included in the files must be marked confidential as indicated in the Statement of Confidentiality paragraph above. If the document originates in the Office of University Development, the originator is responsible for the CONFIDENTIAL mark and sending a copy to file and/or updates to Foundation database management staff as appropriate. If the date and origin need to be noted on a document, they are added to the upper right corner of the first page of the document so they are readily apparent but do not interfere with the CONFIDENTIAL mark.

University development files will be kept in alphabetical order and color-coded: red for individuals, green for corporations, and blue for foundations. Documents on either side of the file are kept in date order with the most recent document on top. Information in the documents is divided into six sections:

1. Gift instruments
2. Correspondence
3. Prospect research reports
4. Briefings
5. News clippings
6. Miscellaneous

Files will be cross-referenced for immediate family and company relationships. Research staff will create new and supplemental files when appropriate. Files are divided based on the beginning of the calendar year. The dates of the documents contained in the original file are noted on the original file's tab and the date of the initial document in the new file is noted on the new file's tab.

A new central file will be created when:

- A donor has given a gift of more than \$20,000

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- A donor has made a will, bequest or planned gift to PSU
- Prospect research has been performed on a donor or prospect
- A new company is created as a result of a business transaction and is a potential donor to PSU
- A significant number of documents about a donor or prospect accumulate in the central file
- Deemed necessary by prospect research and management staff

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