

**POLICY NAME** PERSONAL INFORMATION CONFIDENTIALITY - EMPLOYEES

**POLICY NUMBER 2.5.5**

**CATEGORIES**

**DATE PROPOSED:** 4/15/2019

**DATE OF VOTE:** 4/17/2019

**ACCEPT (Y/N):** Y

Ice Sports Center (ISC) policy is to safeguard personal employee information to ensure confidentiality. Additionally, the MIC will only collect personal information that is required to pursue its business operations and to comply with government reporting and disclosure requirements. Personal information collected by the MIC includes employee names, addresses, telephone numbers, e-mail addresses, emergency contact information, Equal Employment Opportunity (EEO) data, social security numbers, date of birth, employment eligibility data, benefits plan enrollment information, which may include dependent personal information, and school/college or certification credentials. All pre-employment inquiry information and reference checking records conducted on employees and former employee files are maintained in locked secure areas and are not used by the ISC in the course of its business operations.

Personal employee information will be considered confidential and as such will be shared internally only as required and with those who have a legitimate need to have access to such information. Personal employee information will not be disclosed to patrons or others outside of the facility without a release form signed by the employee whose information is being shared. All hard copy records will be maintained in locked, secure areas with access limited to those who have a legitimate need for such access.

If an employee becomes aware of a material breach in maintaining the confidentiality of his or her personal information, the employee should report the incident to the Human Resources Administrator and/or the Senior Facility Manager (SFM). The SFM will have responsibility to investigate the incident and take corrective action if necessary. Please be aware that a standard of reasonableness will apply in these circumstances. Examples of the release of personal employee information that will not be considered a breach include the following:

1. Personal telephone numbers or email addresses may be distributed to managers in order to facilitate MIC communications or business operations.
2. Instructor email addresses will be made available to patrons for the purpose of requesting private instruction.
3. Release of partial employee birth dates (day and month) is not considered confidential and may be shared with managers who elect to recognize employees on such dates.