

WSRE PBS | WSRE-TV Foundation, Inc. Confidentiality Protocol Statement

Introduction

WSRE PBS, a service of Pensacola State College, the Pensacola State College District Board of Trustees and WSRE-TV Foundation, Inc. (“WSRE”) are committed to the ethical collection and use of information in the pursuit of legitimate institutional goals. In addition to this responsibility, WSRE and the Foundation are obligated by terms of FCC licensure and Corporation for Public Broadcasting grant requirements to observe the following protocols:

We shall support and further the individual’s right to privacy and subscribe to the following basic principles regarding ethics and confidentiality:

- The principle of the right to privacy. Every individual has the right to privacy. Consequently, information that is not available from public sources should not be disclosed.
- The principle of information necessity. Only information that has to do with the capacity or inclination of an individual to become a member of WSRE or to make a gift to WSRE is the proper subject of research.
- The principle of individual ethical responsibility. Any individual whether an employee of this institution, a volunteer, or an outside consultant is responsible for the ethical ramifications of his or her individual acts.
- The principle of protection of confidential material. Records about individuals and organizations are confidential, and are to be used only by those staff members who need to use them to further the legitimate mission of WSRE, the WSRE-TV Foundation, or Pensacola Junior College.
- The principle of record sensitivity. Records have an enduring power and may improve or ruin individual lives. Since records might become available to their subjects or to others who do not understand appropriate use of sensitive materials, everyone must ensure that records are not used in a harmful manner.

Purpose

These protocols will protect our members and donors and guide our staff by providing general principles and practices related to all aspects of confidentiality. Since the protocol is not intended to give every detail, operational areas might need to develop specific guidelines that address their unique circumstances. The protocol applies to all types of confidential information, regardless of form, including but not limited to, hard copy, electronic, film, or any other medium. It applies not only to WSRE/Pensacola State College employees, but to employees of the WSRE-TV Foundation, and any other employees who are engaged in fundraising on the station’s behalf, along with volunteers, leased employees, consultants, or others outside of WSRE, who work to further the station’s donor relations and developmental efforts.

Confidential Information

Confidential information is described by, but not limited to, the following general classes:

- name, address, telephone number or social security number;
- information about members, prospects and donors gathered to aid in determining appropriateness of solicitation and level of membership or gift request;
- specific data in prospect lists that would identify prospects to be solicited, dollar amounts to be requested, and name of solicitor;
- portions of solicitation letters and proposals that identify the prospect being solicited and the dollar amount being requested;
- letters, pledge cards, copies of checks and other responses received from members or donors regarding memberships, or prospective gifts in response to solicitations;
- portions of thank-you letters and other membership or gift acknowledgement communications that would identify the name of the member or donor and the specific amount of the gift, pledge, or pledge payment;
- donor's financial or state planning information, or portions of memoranda, letters, interview notes, or other documents about any donor's financial circumstances; and
- data detailing dates of memberships, gifts, payment schedule of gifts, form of gifts, and specific gift amounts made by donors.

Collection

Collection of data as it relates to the WSRE donor database and all other station and WSRE-TV Foundation systems is limited to public sources and call reports. Information should be stated in an objective and factual manner and, whenever possible, attributed to the source. Information sought and recorded may include all public records. Employees, agents and volunteers of the WSRE-TV Foundation and WSRE/Pensacola State College, however, shall not seek out or report public information of a personal nature such as that contained in documents related to divorce, child custody, probate, or bankruptcy. Collection and use of information shall be done lawfully and openly. Therefore, written requests for public information shall be made on station stationery clearly identifying the sender. Also, when requesting information in person or by telephone, neither individual nor station identity shall be concealed.

Safeguarding

Computer

- An individual with a legitimate need for access to any of the databases must obtain the proper authorization.
- There are specific detailed guidelines for access to Allegiance and all other College and Foundation systems. They apply to online access and also to download requests.
- Access accounts and passwords are not to be loaned or transferred to others.
- When employment is terminated or when job duties change so that the individual no longer needs access, the supervisor must make the proper notifications.
- Users should log off when they will be absent from their computer terminal for a break or any other extended period.

- Electronic mail is not a secure communication medium and so it should be used judiciously, only when there is no other practical choice.
- Screen prints and paper downloads need to be handled as hard copy.

Hard Copy

- Hard copies generated by the station and the Foundation must be marked plainly as confidential and the property of the entity.
- Confidential documents should be kept under lock when possible. If station or Foundation documents are kept in an office not located at the station's main offices, a separate, locked file cabinet must be used.
- Only the source of a confidential document is authorized to share it. Therefore, never share an open copy or a blind copy without the permission of the originator.
- Because of the sensitive nature of the information they contain, Allegiance biographical and financial reports and other confidential material should not be transmitted by facsimile.
- When confidential information is mailed, or sent through intra-office channels, always place it in a sealed envelope and clearly mark it "Confidential."
- Dispose of all confidential documents by shredding them in a timely manner.

Other Media

Electronic files, tapes, film, microfiche or other media must be controlled and destroyed as dictated by the technology. It is the responsibility of the user to develop appropriate procedures.

Release

Confidential information is collected and maintained for the purpose of furthering the membership or fundraising operation of the station or Foundation, respectively, and the College. Therefore, any confidential information is released for those purposes only. Legal documents, however, can be released only with the permission of the donor.

When an employee of the Foundation or the college must share confidential information about a member, donor or prospect in order to perform their duties, the volunteer or agent must execute a written confidentiality agreement before the information is transferred. Nonetheless, the employee is ultimately responsible for the release of the confidential information.

Confidential information is not available to groups or individuals for any other uses, such as for vendor usage, for political mailing lists or for locating old friends. Therefore, addresses or telephone numbers are not to be released to third parties.

Questions about the appropriate release of information should be referred to the General Manager of WSRE.

Conclusion

Since it is so critical to the mission of WSRE that confidentiality be respected and maintained, all employees and any leased staff, volunteers or contract staff that have access to confidential

information are required to sign a confidentiality agreement and abide by its terms. The executed agreement will be kept in the office of the General Manager. Since supervisors are responsible for their staff, they should provide proper orientation, obtain agreement, continue training, and monitor employees to ensure compliance.

Should any action that violates the confidentiality policy or protocols occur, the station's policies for verbal/written reprimand or possible termination of employment will govern.

Serious violations will be handled immediately by the General Manager and may result in immediate revocation of Allegiance and all other station and Foundation system access or termination of employment.