



HRAR 11.04 Protection of Restricted and Confidential Information

Purpose

As a result of employment with the City, employees may have access to information about City employees, vendors, and/or the public, which is restricted or confidential. City employees are responsible for ensuring that restricted and confidential information is reasonably protected.

Accessing and Using Restricted and Confidential Information

Employees shall not access or attempt to access restricted or confidential information for which they have not been authorized to access.

Employees shall not disclose restricted or confidential information by any means except in accordance with Human Resources Administrative Rules, City Technology Policies, bureau-specific policies and regulations or when required by law.

Employees shall discuss restricted or confidential information that is used in their work only with those people who have a need to know and in non-public locations.

Even after termination of employment with the City, former employees are responsible for not disclosing restricted or confidential information of any kind that was obtained as a result of their employment with the City.

This policy does not prevent employees from bringing forward complaints disclosing fraud or impropriety, or from engaging in privileged communication.

Collecting, Storing and Disposing of Information

Employees are responsible for the protection and safekeeping of restricted and confidential information, documents and material and for the handling of such information, documents and material in their possession, in whatever form that information is contained (i.e. electronic, physical), so as to prevent disclosure to unauthorized persons.

Duty to Report

Employees have a duty to report to their supervisor or another manager any circumstances that cause them to believe the restricted or confidential nature of their work may be compromised or any restricted or confidential information was disclosed in violation of this policy.

Definitions

For purposes of this policy, the following definitions apply.

Confidential: Information that is made confidential or privileged by law or the disclosure of information that is otherwise prohibited by law or City policy.

Restricted: Some restrictions or limitations on the use of or disclosure of the information.

**Administrative Rule
History**

Adopted by Chief Administrative Officer April 25, 2016

Guidance for HR Administrative Rule 11.04

Protection of Restricted and Confidential Information

April 22, 2016

Examples of Confidential Information include but are not limited to:

- Social security number
- Driver's license number or state identification issued by the Department of Transportation
- Passport number or other identification issued by the United States
- A financial account, credit card or debit card number or any required security or access code or password that allows use of the account
- Age, birthdate, gender, race, ethnicity, disability
- Criminal record
- Protected health information, including but not limited to an employee's medical information and all information protected by the Americans with Disabilities Act (ADA) and the Health Insurance Portability and Accountability Act (HIPAA)
- For a member of the public, a person's first name or first initial and last name in combination with home address and telephone number
- For an employee, residential addresses, residential telephone numbers, personal cellular telephone numbers, personal electronic mail addresses, driver license numbers, employer-issued identification card numbers, emergency contact information, Social Security numbers, dates of birth and other telephone numbers contained in personnel records