**Blackford County Community Foundation**

**Confidentiality Policy**

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The Blackford County Community Foundation manages much information that must be kept confidential, including information about donors, prospective donors, grantees, prospective grantees, wealth advisors and their firms. In order for the Foundation to operate, its personnel must also respect the confidentiality of discussions that take place and information that is shared as it conducts its business.

The Foundation’s board has adopted this Policy on Confidentiality to assist its directors, officers, employees, volunteers, and consultants in fulfilling their confidentiality obligations. Situations not covered by this policy should be discussed with the board president or the executive director.

**Section 1: Who must comply with policy**

Members of the board, employees, consultants, and community volunteers, including those serving on scholarship selection committees and emergency and disaster assistance grant committees, may have access to information that Blackford County Community Foundation, Inc. considers confidential.

**Section 2: Information covered by policy**

Confidential information includes, but is not limited to,

* Donor information, such as donor lists and donor targets;
* Financial information, such as budget information, balances in any fund, and amounts contributed by certain donors and the nature of those gifts;
* Grantee information, such as the identity of grant applicants and the personal and financial information submitted as part of the application. This includes information provided by applicants for grants to individuals such as scholarships and hardship assistance, especially any social security numbers and personal finance information demonstrating need.
* Foundation business information, such as discussions and records of the Foundation’s operations, fundraising, investments, personnel, grantmaking, and contractual relationships except as authorized by the Foundation’s board or the appropriate board committee.
* Financial information collected when issuing a charitable gift annuity will be considered confidential.
* Foundation personnel who, as part of their job, have access to information about salary, benefits or discipline of employees are expected to treat the information as confidential and not discuss or disclose it except as may be necessary in connection with the performance of their work.
* All information regarding an employee’s medical records or health status will be kept in separate files and shall be accessed only on a “need to know” basis.

**Section 3: What exceptions apply**

* Donors, however, may be listed by name in the Foundation’s annual reports and other report listings such as the Foundation website unless a donor specifically requests anonymity. Such anonymous donors will be known to only accounting personnel and the Executive Director.
* The Foundation will also provide the names of the donors of memorial gifts to members of the immediate family unless a donor requests anonymity.
* Except in the case of hardship assistance grants to individuals, the Foundation will generally publicize the identity of grantees and the amount awarded.
* Employees may discuss employee confidential information as necessary in connection with the performance of their work.
* This policy does not apply to disclosures to attorneys, accountants and other professionals providing assistance to the Foundation; nor to tax authorities, government agencies, courts, or as otherwise required by law.
* This policy does not apply to the Foundation’s annual report once it has been accepted by the board, nor to the Form 990 as required to be publically disclosed (not including the names and addresses of donors since that is not required to be disclosed), nor to the Foundation’s investment and spending policies.

**Section 4: Who may authorize disclosure**

Any questions as to the confidential nature of information should be directed to the Executive Director or to the president of the board.

**Section 5: How confidential information is protected**

* All information regarding an employee’s medical records or health status will be kept in separate files and shall be accessed only on a “need to know” basis.
* Foundation personnel should secure information taken outside the Foundation offices or copied from its network. Any information so removed should be returned as soon as possible and deleted from laptops or other personal devices.

**Section 6: How the policy is communicated and enforced**

All Foundation personnel, including board members, staff, volunteers, and consultants, will receive a copy of this Confidentiality Policy to sign, thus acknowledging their understanding of the policy. Unauthorized disclosure of confidential information will subject an employee to immediate discharge and possible criminal and civil penalties or a board member to removal from the board.

**I have read the Confidentiality Policy and agree to comply with it.**

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**Printed Name Signature Date**

**I am a \_\_\_\_\_\_\_ Board Member \_\_\_\_\_\_\_ Staff Member \_\_\_\_\_\_ Volunteer**

 **\_\_\_\_\_\_\_ Consultant**

Adopted April 16, 2015