
Policy: Privacy Policy
Policy No: 4.18
Approved: Board of Trustees: March 2006

PRIVACY POLICY

Sullivan County Community College is committed to protecting the privacy and confidentiality of personal health information of the employees of the College and the students attending College. Health information is strictly confidential and should never be disclosed, nor confirmed to anyone who is not specifically authorized under law or College policy to receive the information.

This policy applies to all members of the College's workforce, whether directly employed by the College or serving under an alternative arrangement such as, but not limited to:

- Employees (all professional, civil service and management confidential staff)
- Volunteers
- Students participating in the Nursing, Early Childhood Education and Human Service educational programs
- Contracted staff (including temporary staff)
- Consultants
- Students performing work for the College under the Federal Work Study program or similar program(s)

STATEMENT OF INTENT

This policy is intended to ensure that personal health information required by the College to comply with federal, state and local laws is kept confidential and not released to anyone who does not have a bona fide need to know. It is the responsibility of each and every staff member having access to this information to ensure that the information is appropriately gathered, used only to document that which is required by the College, filed in accordance with record retention standards and not disclosed to anyone who is not authorized to have the information. Failure to adhere to federal and state law or College policy regarding the confidentiality of

protected information will be considered a breach of confidentiality and will result in the imposition of appropriate sanctions.

Each department either having or requiring access to personal health information of either an employee or student within Sullivan County Community College is expected to have written procedures regarding the collection of the information, filing and retention standards that are shared with current and newly hired staff responsible for handling this information. Any and all breaches of confidentiality are to be reported to the Director of Human Resources, the designated privacy officer of the College, upon discovery. Failure to report a breach will be considered a violation of this policy.

COMPLAINT, INVESTIGATION AND SANCTION PROCESS

Complaints regarding policy breaches and failure to report breaches will be investigated in the same manner as violations of the College's sexual harassment policy.

Upon a finding of a breach of confidentiality, by an employee in a collective bargaining unit, the College shall initiate action pursuant to the applicable collective bargaining agreement to implement an appropriate disciplinary penalty. Such penalty may include, but is not limited to the following:

- Letter of reprimand
- Suspension
- Fine
- Demotion
- Termination of employment