

University Lutheran Church of Hope
Confidential Information Policy

1. Purpose and Scope

- a. This document contains the policy of University Lutheran Church of Hope¹ for protecting the confidential information that may be entrusted to its staff, volunteers, or members while they are engaged in its ministries and its organized activities. The policy describes, in general terms, how confidential information is to be protected. However, the boards, officers, and staff of Hope will need to use judgment in applying this policy to specific cases. The primary focus of this policy is on information that is collected and used by the congregation to support its programs and administration. This policy does not attempt to take the place of laws and policies that already address the confidential relationship between clergy and parishioner or between counselor and client.

2. Definitions

- a. "Contact information" refers to personal addresses, phone numbers, email addresses, photographs, or other commonly shared types of personal information that help support congregational ministries and programs.
- b. "Confidential information" refers to private information that is protected by law or shared in confidence. Such information includes, but is not limited to, Social Security numbers, marital status, medical concerns, and the results of pre-screenings and background checks.
- c. "Ministry partner" refers to an organization that is closely associated with Hope and its ministries (such as the Evangelical Lutheran Church in America, its member congregations, or its agencies), or to the designated representatives of such an organization.
- d. "Unrelated third party" refers to an individual who is not a member or a staff member of Hope; to an organization other than Hope; or to a representative of an organization other than Hope.
- e. "Manually-maintained records" refers to information that is not stored electronically. Such information is typically paper-based.
- f. "Electronically stored information" refers to data that is stored and retrieved using a computer or some other electronic device. Such information may be stored in a database, spreadsheet, text file, or other electronic format and must be retrieved or printed from that format in order to be viewed.
- g. "Consent" refers to agreement by an individual that information about them may be released to a ministry partner or an unrelated third party. For purposes of this policy, a person under the age of 18 is not considered eligible to give consent, and in that case consent must be obtained from the individual's parent or guardian.
- h. "Explicit consent" means that the agreement of an individual to release his or her confidential information should be unambiguous. Explicit consent is granted by signing an appropriate paper form. The form should clearly state the intended use of the released information.

3. Contact Information vs. Confidential Information

- a. Hope acquires and stores contact information, both electronically and in manually-maintained form, in order to facilitate communication and church administration. All contact information collected by Hope is to be used solely by Hope staff and members for church-related purposes and is not to be disclosed to unrelated third parties without consent.

¹ Referred to in this document simply as "Hope" or as "the congregation."

- b. From time to time Hope may also receive confidential information about some of its members. Such confidential information should be retained only when directly required by law or in order to support the relationship of that individual to Hope.
 - c. An example of how confidential information may be acquired is the requirement that there be pre-screening and background checks for volunteers whose activities on behalf of the congregation will involve contact with children.
4. Proper Use of Confidential Information
- a. Confidential information provided to Hope is not to be disclosed or released to either a ministry partner or an unrelated third party without consent.
 - b. The results of all security background and reference checks—or the refusal of any person to participate in a program or activity because of such disclosure requirements—will be maintained in the strictest confidence. The only exception to this rule will be if disclosure to appropriate authorities is required to protect a child from possible harm.
5. Securing Confidential Information
- a. Confidential information is to be secured against the unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction of that information.
 - b. Confidential information is to be kept in locked cabinets or locked offices.
6. Securing Electronic Information
- a. Confidential information that is electronically stored is to be protected by passwords known only to authorized users. All such passwords are to be changed at least once each year. The servers storing such information must be secured in locked cabinets or locked rooms.
7. Retention of Information
- a. Contact information may be retained for archival and historical purposes. Such archival information may be retained indefinitely.
 - b. Confidential information about an individual may not be kept after the relationship between that person and Hope ends. Information that is out of date or no longer required should be deleted or destroyed. Manually-maintained information should be shredded before disposal, and care should be taken that electronic information is permanently deleted.
 - c. Backups of electronic data containing confidential information are subject to the same restrictions as the current (or “production”) versions of that data.
8. Limits to This Policy
- a. While Hope exercises all due care to protect the privacy of its members, the congregation is not responsible for the actions of parties who illegally gain access to its offices or to its website(s) or who intercept or access transmissions or private communications.
9. For Questions or More Information
- a. If you have questions about this policy or would like additional information, please contact the congregation office.

Policy approved by Board of Commissioners,
University Lutheran Church of Hope,
August 8, 2007