

PURPOSE: TO DESCRIBE OFFICIAL REPOSITORIES FOR STUDENT AND EMPLOYEE RECORDS AND TO DISSEMINATE INFORMATION CONCERNING THE PROTECTION OF STUDENT AND EMPLOYEE RIGHTS AND THE PRIVACY OF INFORMATION.

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#### A. GENERAL

Brenau University, as an educational institution, maintains a continual commitment to and concern for student rights and privacy of information. Brenau regulates the accessibility and confidentiality of student records as mandated by FERPA (the Family Educational Rights and Privacy Act of 1974). In addition, Brenau University is subject to the provisions of the Gramm-Leach-Bliley Act of 1999 related to the security, confidentiality and integrity of customer (student) financial information that includes all financial transactions related to the student's financial account with Brenau University. All Brenau employees agree upon hire to uphold the institution's policies regarding confidential records as outlined in the Brenau Catalog. Employees may be held responsible for any breach of confidentiality in regards to student rights and private information.

#### B. STUDENT INFORMATION:

Brenau has a long-standing commitment to, and concern for, protection of student rights and privacy of information. Brenau complies with the provisions of the Family Educational Rights and Privacy Act of 1974, which relates to accessibility and confidentiality of student records. All student records, whether of a scholastic or disciplinary nature, are considered confidential. Brenau University provides annual notification to students of their rights under this law. Information regarding FERPA and The Graham Leach Bliley Act may be found at [http://www.aacrao.org/federal\\_relations/ferpa/index.cfm](http://www.aacrao.org/federal_relations/ferpa/index.cfm).

1. Brenau maintains students' records in several locations on campus and the nature and description of these records may be found in the current catalog under Student Records.
2. Official copies of transcripts or regulations regarding review and corrections of student records are in accordance with the Privacy Act and the information regarding the process of requesting transcripts or reviewing records may also be found in the current catalog under Student Records.
3. All Brenau employees are required to sign a confidentiality agreement.
4. Effective January 2013 all student personnel files will be stored electronically and will remain accessible for the retention period required by law.

#### C. EMPLOYEE INFORMATION:

1. All personnel files are maintained in the Office for Human Resources and are the property of Brenau University. The contents of these files are confidential and will not be released to any individual or entity without the written request or consent of the employee or former employee, unless subpoenaed by a court having jurisdiction over Brenau.
2. Generally, requests for reference information on current or past employees should be channeled to the Office of Human Resources. In some instances, when an employee or ex-employee has requested a reference letter from a supervisor or co-worker, the reference letter may be prepared by that individual with a copy of the reference letter sent to the Office of Human Resources for inclusion in the employee's file.

3. A university employee should not share comments related to the work history or competencies of another employee (or ex-employee) with outside sources unless they have been specifically asked to do so by that individual and have been given a written release to share information. Unauthorized sharing of information without a release can incur liability on the part of the individual providing the information.
4. All requests for work history (dates) or salary verification must be directed to the Office of Human Resources.
5. Effective January 2013 all personnel files will be stored electronically and will remain accessible for the retention period required by law.
6. Legal Documents and Requests for Information: From time to time, employees of Brenau may be served with subpoenas for Brenau records, request for documents or information from attorneys either by telephone, mail, e-mail or other means of communication, requests from investigators or law officers for information and/or documents, or any other contacts of a legal nature concerning Brenau University, its departments, colleges and schools. Any employee receiving any such communication, court document or message must immediately notify the office of the Senior Vice President for Administration & CFO of the University and provide to that office the legal document, letter or message received. An employee may not respond directly to such contacts on behalf of Brenau unless authorized by the Senior VP for Administration & CFO or the President.

#### D. SOCIAL SECURITY NUMBER PRIVACY

It is the policy of Brenau University to protect the confidentiality of Social Security numbers obtained and used in the course of business from its employees and students. All employees are expected to strictly adhere to this policy. Any employee violating the provisions of this policy and its operating procedures will be disciplined in accordance with university policies.

1. Collection of Numbers: Social Security numbers will be collected from students and employees as required in order to meet federal and/or state reporting requirements. These purposes include, but may not be limited to the following: conduct pre-employment background checks, to verify eligibility for employment, to withhold federal and state taxes, to comply with state new-hire reporting, to facilitate enrollment in company benefits plans.
2. Destruction of Numbers: Records that include Social Security numbers will be maintained in accordance with federal and state laws. When such documents are released for destruction, the records will be destroyed.

#### E. TIPS TO PROMOTE INFORMATION PRIVACY:

1. Documents containing sensitive information should be shredded.
2. Computers should be locked when an employee steps away, even for a moment.
3. Files should be locked in cabinets when they are not in use.
4. Campus mail should be sent in sealed envelopes.
5. Social security numbers should not be used in emails.
6. Never release information about a student or employee unless specifically authorized by the HR Director or Senior VP for Administration & CFO.