

Employee Code of Responsibility for Student, Finance, Human Resources, and Payroll Information

Confidentiality of Student Records

In compliance with the guidelines incorporated in the Family Educational Rights and Privacy Act, 1974 – (FERPA), Section 1002.22, Florida Statutes, and the Florida Gulf Coast University’s Student Records Policy, you are required to take every precaution to protect the integrity of our student records.

Federal law and Chapter 1002.22 F.S. prohibits the disclosure of information contained in students’ education records to third parties -- including fellow students, parents, spouses, etc. -- without the student’s written consent. No one other than the student has the right, under the Public Records Act, to see the student’s records. The law does not permit the release of such information to an Early Admitted or Dual Enrolled student’s parents, regardless of the age of the student. Further, only University employees with a “need to know” may review a student’s education record. Education records consist of personally identifiable information about a student. Education records do not include medical, law enforcement (depends), personal records or notes maintained by faculty/staff, student employment, or alumni records. However, these records fall within the parameters of Florida’s Public Records Law, Chapter 119, Florida Statutes, and other state or federal laws.

You are responsible for distinguishing between public/directory and confidential information. For guidance regarding the release of directory vs. confidential information contained in student records, read the Education Records Policy 3.006. Confidential information regarding students or employees may not be released in any personally identifiable format without written permission of the individual. If you are in doubt, refer the requestor to the office responsible for maintaining the information requested. Student directory information may be released unless a student has requested otherwise. Always check the “Privacy Flag” in the student information system before releasing directory information. Public information may be displayed in either individual or aggregated format.

Confidentiality of Employee Records

Employee payroll and personnel information to which an employee has access is to be handled in a confidential manner safeguarding its exposure to possible theft or manipulation. Chapter 119.07, F.S. provides for the confidentiality of specific employee personnel information such as social security numbers, medical information and evaluation of academic performance. While most other employee information is public record, in responding to requests for payroll and personnel information.

Information provided to you to conduct official University business may not be used for other purposes or passed on by you to any unauthorized person. You are responsible for the security of all data to which

you have access which refers to storing confidential documents in locked cabinets, periodically updating network or system passwords, and ensuring desktops/PCs are properly signed off when not in use.

Official university counts of students, employees and other items are maintained and supplied by the Office of Planning and Institutional Performance. Regardless of your access to University records, it is your responsibility to use official counts when completing surveys, grant proposals, etc.

Confidentiality of Credit Card Information Agreement

Access to credit card information requires the highest degree of public trust to protect the interest of the University and the cardholders. It is a breach of ethical standards for any employee of the University or third party with access to credit card information to divulge either directly or indirectly any cardholder information except on a need-to-know basis. Additionally, the release of cardholder information may only be done in a secure manner following the Restricted Data Policy 3.042 with proper authorization from the director, associate director, manager, or appropriate supervisor.

As an employee of Florida Gulf Coast University, I am aware that any release of education records which would identify a specific student is prohibited unless we have a written release from that student. I am also aware that confidentiality of student records is required by Federal and State Law. I understand that it is my responsibility to read the Credit Card Security compliance training available at http://www.fgcu.edu/AS/Finance/secure/FGCU_PCI_DSS.pdf and will abide by its guidelines and that failure to comply may result in criminal and/or disciplinary action, up to and including termination.

Further, I agree to report any violations of security policy, practice or procedure of which I become aware, to my supervisor, the Information Security Manager/Administrator(s) or other such person(s) designated with the responsibility for handling matters of a security nature. I understand that any access granted to me in accordance with my job responsibilities will not be shared. I will not allow others to use my account(s) or tell them my account password(s). I understand that divulging confidential information or the unauthorized release of records is a violation of the University disciplinary standards and may result in appropriate disciplinary action being taken against me, including up to termination.

I agree to seek advice before releasing information from an FGCU student's educational records & an FGCU employee's personnel information to anyone. I will refer inquiries about student records to the Registrar's Office and employee related inquiries to Human Resources.