

**FINAL DRAFT**  
**North American Society for Pediatric Gastroenterology, Hepatology and Nutrition**  
**(NASPGHAN)**  
**Confidentiality Policy**

**Preamble:**

This policy is intended to provide guidelines for NASPGHAN members, designees, and employees when working with personal or confidential information. Maintaining the security of members' personal or confidential information is important to NASPGHAN. Only authorized personnel have access to this information, and our organizational data systems and procedures are designed to prevent unauthorized access, misuse, disclosure, alteration, loss, or destruction of this information. The primary objective of this policy is to ensure that the use of this information both respects the privacy of individual members and allows the organization to function in an efficient and ethical manner.

**1. Definition of Terms**

**1.1. Confidential Information related to Policies and Procedures of NASPGHAN**

Confidential information includes:

Any information not found in the public domain. Members, designees, and employees acting in an official capacity on behalf of NASPGHAN owe to the rest of the membership the duties of good faith, trust, confidence, and candor in the management of confidential information.

**1.2 Personal Information related to Policies and Procedures of NASPGHAN**

Personal information is any oral, electronic or written information about an identifiable individual. Personal information includes, but is not limited to:

- Names and titles
- Gender, date and place of birth
- Education and professional training
- Professional credentials
- Business address, email address, telephone and fax numbers
- Home address, email address, telephone and fax numbers

**2. Use of Personal Information**

Personal information collected by NASPGHAN is used:

- To send members information directly related to their membership, such as the Annual Meeting and related notices and requests for annual membership fees. Members may indicate that they do not want NASPGHAN to release their personal information to vendors when they register for NASPGHAN-sponsored events.

- To administer the benefits of membership, such as the free subscription to the Journal of Pediatric Gastroenterology and Nutrition, and notices of available research awards, educational opportunities, meetings, and research surveys.
- To include in a database available only to other NASPGHAN members for the purpose of locating colleagues (you may choose not to release your personal information for this purpose).

Before using members' personal information for any purpose other than those listed above, NASPGHAN will explain the purpose and obtain consent.

### **3. Policy regarding members required to sign a confidentiality agreement to serve in an organizational capacity**

Members, designees, and employees with access to confidential information will be required to execute a confidentiality agreement with NASPGHAN. This includes, but may not be limited to, executive officers, committee chairs, Ethics committee members, and the organizational administrators.

### **4. Policy regarding handling confidential information**

- All confidential information described above will remain confidential.
- All confidential documents will be labeled "Confidential".
- Confidential documents will be stored out of view in a locked container.
- Confidential information on personal computers must be password protected and will not be left open when away from the computer. Screen savers should also be used and should be password protected.
- When printing a confidential document, the printer must be monitored. Confidential print jobs will not be left unattended.
- All confidential documents from the photocopy machine will be removed when jobs have been completed. In the event of a machine jam, confidential papers will be removed and shredded.
- Doors are to be closed during discussions regarding any confidential information. All white boards, flip charts, and papers will be erased and/or removed after a meeting. All copies of confidential documents used during the meeting will be shredded.
- Confidential mail can be sent via regular mail courier envelopes but will be sent in a sealed envelope within the messenger envelope and marked appropriately.

Please instruct clerical support staff that incoming mail marked “Confidential” should be delivered unopened to the recipient immediately.

- Confidential papers (including notes and working papers) will not be discarded in wastebaskets or recycle bins. Confidential papers will be shredded.
- Do not transmit confidential information via facsimile/fax machine if possible. If this is absolutely necessary, arrangements should be made at both ends of the transmission to monitor the fax machine until the entire fax has been sent and received. Do not leave a fax machine unattended when sending or receiving a confidential document. The following statement should be included in the fax transmittal sheet:
  - *CONFIDENTIALITY NOTICE: This Facsimile transmission is intended only for the addressee shown above. It may contain information that is privileged, confidential or otherwise protected from disclosure. Any review, dissemination or use of this transmission or any of its contents by persons other than the addressee is strictly prohibited. If you received this fax in error, please call us immediately upon receipt and return the facsimile documents, by first class mail, to the address above. Thank you for your cooperation.*
- All conference calls where confidential information may be discussed will be conducted where privacy is assured (closed doors, walls, etc.).
- Confidential information will not be discussed using cellular telephones as this mode of communication can easily be accessed by radio scanners.
- Individuals should be cautious when leaving voice mail messages that may contain confidential information.
- Electronic mail messages should not be used to share confidential information since they can be accessed fairly easily by experienced users.

## **5. Confidentiality Agreement**

I understand that information contained in records submitted to NASPGHAN is confidential. It is the responsibility of NASPGHAN to protect the confidentiality of this information. I agree to follow all of the NASPGHAN policies regarding confidentiality. I understand that any violation of these policies could result in corrective action up to and including immediate dismissal from the position, as well as civil and/or criminal penalties. I agree that I will continue to maintain confidentiality of this information after the expiration of my term/employment.

Member name: \_\_\_\_\_

Member Signature: \_\_\_\_\_

Date: \_\_\_\_\_