
	<p>City of Albany Administrative Policy Employee Relations Policy #: HR-ER-17-002 Title: Security and Confidentiality of Human Resources and Payroll Information, Records and Files</p>	<p>Human Resources</p>
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Purpose Security and confidentiality of the City’s Human Resources and Payroll records are matters of concern to all City employees. The purpose of this policy is to clarify responsibilities in these areas. Each individual employee who has access to confidential information is expected to adhere to this Policy.

Policy

It is the policy of the City to secure the confidentiality of the City’s Human Resources and Payroll records.

- A. Human Resources and Payroll information and records are to be accessed only within the scope of an employee’s official duties as an employee of the City.
- B. Accessing of records that are not necessary to perform one’s duties, or that is beyond the scope of one’s duties, is strictly prohibited.
- C. An employee desiring to review Human Resources or Payroll information and records not needed in the scope of duties as a City employee must make a request for such records in the same manner as a non-employee desiring such information.
- D. Requests for Human Resources and Payroll information or records by non-employees are to be made to the Human Resources Information System Coordinator or the Payroll Supervisor, who shall be considered custodians of such records. Such requests shall generally be made in writing.
- E. Employees who have a need to access the Human Resources Information System database to perform the functions of their positions must complete a Request for Access Form. Such forms must be signed by the employee and his/her Department Director, attesting to the employee’s need for such access. Approval, if appropriate, will be granted by the Human Resources Director or designee.
- F. Employees granted access may not:
 - 1. Reveal the contents of Human Resources and Payroll records except in the conduct of his/her work assignments and in accordance with this Policy.
 - 2. Make or allow any unauthorized use of information in the employee data files.
 - 3. Knowingly include false, inaccurate, or misleading information in a report or file.
 - 4. Knowingly expunge a data record or information from a report or record.
 - 5. Share access codes or passwords with another employee.
 - 6. Seek personal benefit or allow others to benefit personally from the knowledge of any confidential information that has been acquired through work assignments.
 - 7. Remove official records or reports, or copies of an official record or report, from the office where it is maintained except in the performance of official duties.


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- G. Requests for aggregate information that does not include personally identifiable information (e.g., social security numbers, home addresses, birth dates, etc.) should be coordinated with Human Resources and/or Payroll to ensure that such information is being compiled and analyzed consistently by all units of the City. Such information shall be considered unofficial if not reviewed by the Custodians of the Records prior to release or use.
- H. Departments that save Human Resources and Payroll data in a department-specific (“shadow”) database must ensure the security and confidentiality of such data in a manner which complies with the provisions of this Policy.
- I. Printing Social Security Numbers (SSN) on any materials not requested by the employee or customer, unless redacted; or publicly posting or displaying SSNs, is prohibited. Exemptions include requirements by the state of Oregon, federal laws, including statute, such as W-2s, W-4s, 1099s, etc; records for use for internal verification or administrative processes; and records used for enforcing a judgment or court order.
- J. Subpoenas for information or records from the City’s files and databases must be referred to the Custodians of the Records, who will consult with the City Attorney prior to releasing such information.
- K. All City employees who have knowledge of a violation of this Policy are required to report such violations to a Custodian of the Records or the Human Resources Director.
- L. In the event that personal identifying information has been subject to a security breach, the City will provide notification of the breach to the customer or the employee as soon as possible in writing, electronically if that is the primary manner of communication with the customer or employee, or by telephone if the person is contacted directly. The exception is if the notification would impede a criminal investigation.

Violations of this Policy may result in loss of authorized access to the Human Resources and Payroll databases and disciplinary action up to and including termination.

Definitions	N/A
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References	Refer to Human Resources and Payroll Information Systems Request for Access Form
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Review and Authorization

Supersedes HR-ER-17-001 10/24/2005	Created/Amended by/date SR; 10/ 31/2008	Effective Date 11/03/2008
HR Director	City Manager	

1. Form or worksheet revision related to this document? No Yes

If yes, attach a copy of the revised form or worksheet.

2. Training required? No Yes