

Lebanese American University
CONFIDENTIALITY POLICY

Adopted by the Board of Trustees on March 31 & April 1, 2016

Preamble

In line with its Code of Ethics, the Lebanese American University (the “University”) endeavors at all times, and as much as it is dependent on it, to protect the privacy of all its students, staff, donors, and alumni, and to preserve the confidentiality of the information under its custody.

Purpose of Policy

The purpose of this confidentiality policy is to regulate the exchange of information between different University Persons, as well as between the University and third parties. Disclosure of information may cause harm to the University Person disclosing the information, to the University itself, or to another party, whether inside or outside the University. In order to protect the University’s interests and protect University Persons from any potential harm resulting from any such disclosure, this policy was put into effect.

Definitions

Confidential Information: is any personal information, other than Directory Information, pertaining to any University Person; any information shared with a supervisor, an authorized staff/faculty member, or student; any information relating to personnel issues; and student transcripts and records. If Confidential Information has become Public Information through release by a person other than the University, the University may continue to treat such information as Confidential Information if the University concludes that the release of that information might be harmful or an invasion of privacy if also released by the University.

Directory Information: is information pertaining to a University student that is generally not considered harmful or an invasion of privacy if released, either by itself or in combination with other Directory Information.

Public Information: may include any information, document, or fact previously made available to the public through any media. The University may publish such information to the public voluntarily or on demand.

University Persons: are all staff members and all faculty members and students, whether full-timers or part-timers, alumni, and donors. Board Members are also considered University Persons for purposes of this policy.

Policy Statement

University employees may not disclose Confidential Information within or outside the University, except to individuals or parties proven to be authorized to receive such information. University employees should exercise caution not to disclose such information to anyone else, and to avoid using such information for personal gain or to the advantage of another organization or institution.

How to Protect Confidential Information

University employees:

- Must protect Confidential Information regardless of the media through which it is conveyed: printed material, electronic files, emails, verbal conversations, etc.
- Must protect Confidential Information for the whole life cycle of this information: from creation and all through the cycles of storage, use, transmittal, retention, and finally disposal.
- Should only share Confidential Information on a need-to-know basis and only with authorized personnel.
- Should make sure that, whenever a third party outside the University is to be privy to certain Confidential Information, an agreement is signed to protect such Confidential Information.
- Should make sure that, in the case of imparting Confidential Information to a third party outside the University, any person(s) affected by this sharing of Confidential Information should sign a release form allowing the University to disclose such Confidential Information, and thus releasing the University from all liability.
- Should avoid sharing Confidential Information with family and friends, and avoid talking in public places, such as elevators, airplanes or restaurants, where they can be overheard, about Confidential Information.
- Should report any actual or suspected disclosure of Confidential Information to the University General Counsel.

Policies Relating to Release of Student Information

The University may receive from time to time requests from outside organizations/institutions, such as embassies, financial aid providers, other universities students are applying to, and others,

to access student records containing personal information. The University has established the following policies with respect to the release of such student's personal information.

Release of Directory Information

The University maintains general personal information on students, known as Directory Information, which can be accessed by certain outside organizations/institutions upon request. Such Directory Information may include student:

- names
- addresses
- telephone numbers
- a student identification number assigned by the University
- email addresses
- dates and places of birth and nationality
- most recent educational institution(s) previously attended
- participation in sports and activities
- major fields of study
- enrollment statuses (e.g., full time/part time, campus attended, class year)
- dates of attendance at the University
- degrees and awards received

Only the Registrar's Office may give out Directory Information in response to a request from an outside organization/institution. No other office is allowed to give out such information.

The Registrar's Office will not release certain Directory Information regarding a student if the Registrar's Office receives an Opt-Out Form from the student that applies to the current academic semester or term. A student may opt out of having specific items of his or her Directory Information released by completing and submitting a **Directory Information Opt-Out Form (Attachment A to this Policy)**. The Opt-Out Form is valid only for the semester or term in which the Opt-Out Form is received by the Registrar's Office. A student must submit a new Opt-Out Form in subsequent semesters or terms in order to opt-out of the disclosure of Directory Information during such period. An Opt-Out Form may be provided at any time, but it will apply only to requests for Directory Information made after the date such Opt-Out Form is received by the Registrar's Office.

The Registrar's Office will provide a notice at the beginning of each semester (on paper or electronically) to students of this Confidentiality Policy, the treatment of Directory Information and the opportunity to opt out of disclosure of Directory Information. Students may contact the Registrar's Office with any questions and to obtain an Opt-Out Form or may print and submit the Opt-Out Form attached to this Confidentiality Policy.

Release of Confidential Information Pertaining to Students and Others

Confidential Information relating to students that is not covered by the prior section on Directory Information and Confidential Information of other University Persons will only be released by the Registrar's Office in accordance with this section. No other office is allowed to give out Confidential Information.

The Registrar's Office may release Confidential Information without consent of a student or other University Person in the following situations:

- when the University receives a court order or ruling from a competent authority requesting the University to release information deemed confidential pursuant to this policy.
- when required by law;
- when expressly permitted under a law relating to the release of student records;
- when the information has already been made publicly available by the student or other University Person; and
- in such other instances in which the University determines that the release of information would not be considered harmful or an invasion of privacy.

In all other cases, Confidential Information will only be released by the Registrar's Office if the University receives written authorization from the University Person whose Confidential Information is sought permitting release of the specific items of Confidential Information. In order to provide such authorization, the University Person must complete and sign an **Information Release Form** (*Attachment B to this Policy*). The **Information Release Form** may also be requested from the Registrar's Office.

Lack of University Control over Released Information

Once Confidential Information or Directory Information is released by the University to a person or organization outside the University (other than a University agent or contractor), the University may have no control over the further use or dissemination of such information and students and other University Persons should that fact into consideration as part of their decision whether to sign an Information Release Form or, if a student, to submit a Directory Information Opt-Out Form.

Attachment A

Directory Information Opt-Out Form

For Academic Semester _____

I, the undersigned, request the withholding of the personally-identifiable information that the Lebanese American University (the “University”) has identified as Directory Information as noted below. This request supersedes any prior Directory Information Opt-Out Forms I may have submitted. I understand that, upon submission of this form, the checked Directory Information will not be released to third parties without my written consent unless the University is permitted to release such information under the University’s Confidentiality Policy or is otherwise required by law to release such information without my prior written consent. I further understand that if Directory Information is requested prior to the Registrar’s Office receiving my opt-out request, the University has no obligation to stop the disclosure of my Directory Information.

I further understand that this Directory Information Opt-Out Form shall be effective through the end of the semester in which it is received by the Registrar’s Office.

- All Directory Information**

- The following specific items of Directory Information (check all boxes that apply):**
 - name
 - telephone number
 - student ID number
 - date of birth
 - major field(s) of study
 - dates of attendance at LAU
 - enrollment status (e.g., full time/part time, campus attended, class year)
 - most recent educational institution(s) previously attended
 - address
 - email address
 - place of birth
 - nationality
 - participation in sports and activities
 - degrees and awards received

Student Name _____

Student ID Number _____

Signature _____

Date _____

Submit signed form to Registrar’s Office during normal business hours.

Attachment B

Information Release Form

I, the undersigned, do hereby request that the Lebanese American University (the “University”) give access to _____ (the “Requestor”), and consent to the release to the Requestor of, the information listed below from my records held by the University.

List of Information for Which Consent is Granted:

[Identify specific information by type.]

I do release the University from any claim, demand, or any kind of liability that may stem from such release or be a concern of it.

I do acknowledge that the release of my student record information is solely based on my request and made pursuant to my own demand.

Name _____

LAU ID Number _____

Signature _____

Date _____

Submit signed form to Registrar’s Office during normal business hours.

Attachment C



CONFIDENTIALITY AND NON-DISCLOSURE UNDERTAKING

In line with its Code of Ethics, the Lebanese American University endeavors at all times, and as much as it is dependent on it, to protect the privacy of all its students. As a staff or faculty member employed at LAU, I have access to the student information system, Banner, and other forms of data related to students.

I understand that such information shall be treated as protected information to be used for the sole purpose of performing my duties and I shall preserve all confidentiality related to said information.

I shall read and comply with LAU's Confidentiality Policy, governing protected information, which is listed in http://www.lau.edu.lb/about/governance-policies/policies/confidentiality_policy.pdf?v3.

I acknowledge that failing to abide by the terms and conditions outlined in the Confidentiality Policy, by way of unauthorized disclosure of educational record information or other personal information, will be considered as a breach of my employment/ appointment agreement with LAU and will result in actions taken against me, up to and including termination of my employment/appointment at LAU.

I, _____, have read, understood and agree to comply with the above.

STAFF/ADVISOR/FACULTY NAME:

TITLE:

UNIT/SCHOOL/ DEPARTMENT:

SIGNATURE:

DATE: / /
 Day Month Year

Note: Please send the original signed copy to the University Registrar and keep a copy for your own file.