

## **Volunteers in Medicine Hilton Head Island Donor Privacy and Confidentiality Policy**

Volunteers in Medicine Hilton Head Island (VIM HHI) recognizes that the efficient operation of VIM HHI requires the maintenance and management of extensive donor and prospect records. These records may contain sensitive information that has been shared with or developed by VIM HHI Development staff or volunteers on a confidential basis. (“Records” is construed to mean all files, including electronic data, containing information on donors or prospective donors to VIM HHI.) Donors and prospects may be attracted to VIM HHI on the basis of its ability to assure temporary or permanent anonymity. Protecting donor confidentiality is an essential part of providing good service to donors.

Additionally, care must be taken to preserve confidentiality of discussions that take place and information that is shared in the course of conducting VIM business.

The purpose of this policy is to codify the position of VIM HHI on donor privacy and confidentiality.

**I. Confidentiality of Records:** The Executive Director and Director of Development shall be responsible for maintaining the confidentiality of donor and prospect records, as well as information on VIM HHI’s funds. Records will normally be available to staff as needed to fulfill their duties. At the discretion of the Executive Director or Director of Development, staff may make all or part of any record available to VIM HHI Board members and volunteers to assist them in executing their specific responsibilities. VIM HHI's auditors, legal counsel and other contractors are authorized to review donor/prospect and funds records as required for the purposes for which they are engaged.

All persons accessing donor/prospect or funds records in the conduct of VIM HHI business shall maintain the confidentiality of said records. This applies to Initiatives, Special Project and all other fund types. Staff may share information with donors, beneficiaries, and grantees pertaining to their own gifts, funds, grants, etc.

Except in those instances, any copies of confidential information shall not be held outside VIM HHI’s office for extended periods, and are to be destroyed as soon as possible or as guided by the Document Retention and Destruction Policy.

**II. Publication of Donor Names:** Unless otherwise requested by the donor, the names of all individual donors may be printed in VIM HHI’s annual report and in other appropriate listings. VIM HHI will not publish the amount of any donor's gift

without the permission of the donor. Unless otherwise specified in the document, donors making gifts to VIM HHI by bequest or other testamentary device are deemed to have granted such permission.

**III. Memorial/Tribute Gifts:** The names of donors of memorial or tribute gifts may be released to the honoree, next of kin, or appropriate member of the immediate family, unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor.

**IV. Anonymous Gifts:** The Executive Director and Director of Development are authorized to accept anonymous gifts to VIM HHI, and to handle them appropriately. The name of the donor and size of the gift may be withheld from the Board of Directors at the Executive Director's discretion, if so requested by the donor. When made known to Board members, they will respect the anonymity of any such gift.

**V. Giving Categories:** If giving categories have been stipulated for a specific fund drive, challenge grant, or project, or as part of VIM HHI's ongoing recognition programs, then the donors, unless they otherwise specify, are deemed to have given permission for VIM HHI to publish their names associated with the particular giving category.

Similarly, VIM HHI may publish giving categories associated with donor names in its annual report, and unless a donor specifies otherwise.

**VI. No Disclosures to Third Parties:** VIM HHI shall not release to third parties or allow third parties to copy, inspect or otherwise use VIM HHI records or other information pertaining to the identification of a donor or donor's gifts. No disclosures to third parties of such information, including addresses and demographic information shall be made without the donor's consent.

**VII. Confidentiality of VIM HHI Business:** Discussions that take place in the context of VIM HHI's operations require discretion, including discussions pertaining to grantmaking, personnel issues, development activities, operational fundraising, investment management, etc. The positions or statements of individual board members, advisors, or staff should not be discussed outside of official VIM HHI meetings and processes. Likewise, the content of VIM HHI business, including documents or VIM HHI analysis of documents, should not be discussed or shared outside official meetings and processes.

**VIII. Discussion of Information:** Confidential information about clients, their families and friends will not be discussed for any reason except on a need-to-know basis.

**IX. Public Disclosure:** VIM HHI will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its Form 990 tax returns. This Donor Privacy and Confidentiality Policy shall not be construed in any manner to prevent VIM HHI from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over VIM HHI.

However, all staff, board members, volunteers, and contractors must hold strictly confidential all information of a private nature, including, but not limited to, all items explicitly discussed in this policy.

**X. Consequences of Policy Violation:** Violations of the Confidentiality Policy are considered very serious, and may result in disciplinary action, up to and including dismissal for employees or contractors, or removal from the Board or any committee for volunteers.

**Approved by Volunteers in Medicine Hilton Head Island Board of Directors: 11/21/2013**