



**DEKALB COUNTY  
COMMUNITY  
FOUNDATION**

<b><i>Policy: CONFIDENTIALITY</i></b>	<i>Adopted: April 28, 2016</i>
	<i>Amended:</i>
	<i>Last Approved by the DCCF Board: April 28, 2016</i>

The DeKalb County Community Foundation (IL) recognizes that the efficient operation of the Foundation requires the maintenance and management of extensive donor, prospect and non-for-profit agency records. These records may contain sensitive information that has been shared with or developed by the Foundation 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 the foundation.) Donors, prospects and grant applicants may be attracted to the Foundation 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 and grant applicants.

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

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

All persons accessing donor/prospect/grantee or fund records in the conduct of Foundation business are called upon to maintain the confidentiality of said records. Staff may share information with donors, fund beneficiaries, and grantees pertaining to their own gifts, funds, grants, etc. Except in those instances, any copies of confidential information held outside the Foundation office should not be maintained in files for extended periods, and are to be destroyed as soon as possible.

**II. Publication of Donor Names:** Unless otherwise requested by the donor, the names of all individual donors may be listed in the Foundation’s annual report and/or in other appropriate vehicles, including digital media. The Foundation will not publish the amount of any donor’s gift without the permission of the donor. Donors making gifts to the Foundation 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 expressed consent of the donor.

**IV. Anonymous Gifts:** The Executive Director is authorized to accept anonymous gifts to the Foundation, and to handle them appropriately. The name of the donor and/or size of the gift may be withheld from the

Board of Directors at the Executive Director's discretion, if so requested by the donor. Board members 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 the Foundation's ongoing recognition program, then the donors, unless they otherwise specify, are deemed to have given permission for the Foundation to publish their names associated with the particular giving category.
- VI. **No Disclosures to Third Parties:** The Foundation shall not release to third parties or allow third parties to copy, inspect or otherwise use Foundation records or other information pertaining to the identification of a donor or donor's gifts. No disclosures to third parties of such information, including address and demographic information, shall be made without the donor's consent.
- VII. **Confidentiality of Foundation Business:** Discussions that take place in the context of the Foundation's operations require discretion, including discussions pertaining to grantmaking, personnel issues, development activities, operational fundraising, investment management, etc. The position or statement of individual board members, advisors, or staff should not be discussed outside of official Foundation meetings and processes. Likewise, the content of Foundation business, including documents or Foundation analysis of documents, should not be discussed or shared outside official meetings and processes.
- VIII. **Public Disclosure:** The Foundation will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its IRS Form 990. This policy shall not be construed in any manner so as to prevent the Foundation from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over the Foundation. However, all staff, volunteers, and contractors must hold strictly confidential all issues of a private nature, including, but not limited to, all issues explicitly discussed in this policy.
- IX. **Consequences of Policy Violation:** Violation 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.