

Mario Einaudi Center for International Studies/VPIA Confidentiality and Disclosure Statement

May 2016

The purpose of this annual agreement is to ensure that employees who connect to the Mario Einaudi Center for International Studies network, including its core programs (CIES, EAP, IAD, LASP, REPPY, SAP, SEAP) maintain a complete understanding of policies and responsibilities concerning ethical conduct, confidentiality, conflicts of interest, and conflicts of commitment.

I. Ethical Conduct

Policy 4.6: <http://www.dfa.cornell.edu/dfa/treasurer/policyoffice/policies/volumes/governance/ethical.cfm>

Cornell expects all faculty, staff, student employees, and others, when acting on behalf of the university, to maintain the highest standard of ethical conduct. The University is committed to maintaining the highest standards of integrity in its day-to-day operations and in all aspects of its mission. All employees should be familiar with expectations as detailed in policy 4.6 "Standards of Ethical Conduct."

"Cornell employees are responsible to report any potential financial irregularity under Cornell's policy on Financial Irregularities. Cornell's hotline reporting system: www.hotline.cornell.edu or call 866-293-3077."

II. Confidentiality & Information Security

Users of the Einaudi Center information network systems, including computer, telephone, fax, printers and photocopiers as well as data storage devices, should have no expectation of privacy of information. The I:/Drive is provided to employees to facilitate storage of business-related sensitive data and should not be used as a private location for storage of personal and non-Cornell information.

Confidentiality & Information Security Policy 5.10:

<http://www.dfa.cornell.edu/dfa/treasurer/policyoffice/policies/volumes/informationtech/infosecurity.cfm> Policy 4.12:
<http://www.dfa.cornell.edu/dfa/treasurer/policyoffice/policies/volumes/governance/data.cfm>

Cornell University Policy 5.10 "Information Security of Institutional Information" defines the following information as Level 1 (confidential), Level 2 (restricted), or Level 3 (public):

Level 1 **Confidential**: social security number, credit card number, driver's license number, bank account number, patient treatment information

Level 2 **Restricted**: all other information used in the conduct of university business, unless otherwise classified

Level 3: **Public**: information that has been explicitly made available to the public with no authentication process for network access.

Einaudi Center employees may be granted access to confidential and restricted data in the course of carrying out official University business. University policy 4.12 "Data Stewardship and Custodianship," defines data custodians as anyone who possesses or has access to university administrative data, either electronic or otherwise. Data custodians will be held accountable for maintaining the security and confidentiality of those records to which they are granted access. Custodians may not disclose confidential information unless authorized by management to do so, and must take reasonable precautions to prevent unintended disclosure to unauthorized persons. Further, custodians cannot use knowledge gained through access to confidential information for personal gain.

In accordance with university policy, the Einaudi Center does not allow Level 1 confidential data to be stored in any form on portable (lap-top) computers, portable storage devices (flash drives) or other hand-held telecommunication devices. Confidential data should be stored on secure Center servers. Access to University Level 1 data repositories must be via an account assigned for the sole use of that individual. Paper records containing Level 1 data must be kept locked in a secure location in one site in each program or unit area.

* Note that student transcripts should be handled as Level 1 data and kept 'secure from the public without any possibility of access unless authorized'.

Level 1 data should not be shared over e-mail. The Cornell Dropbox should be used to transmit this information. It can be used by any Cornell community members with an active NetID. General information about the dropbox is located on this website: <http://registrar.sas.cornell.edu/Faculty/dropbox.html>

The login page is here: <https://dropbox.cornell.edu> Once logged in, the instructions for transferring files are provided.

Upon request by Cornell or termination of employment for any reason, employees must turn over to Cornell all information treated as confidential or restricted.

III. Employee Disclosure of External Interests and Time Commitments Conflicts Policy:
<http://www.dfa.cornell.edu/dfa/treasurer/policyoffice/policies/volumes/governance/conflicts.cfm>

The Cornell University Conflicts Policy (for the Ithaca Campus) and Cornell Policy 4.6 “Standards of Ethical Conduct,” require employees to be mindful of situations where there is a potential conflict of interest or commitment. These two categories are described as:

Conflict of Interest: Typically, a conflict of interest may arise when a member has the opportunity to influence the University’s business, administrative, academic or other decisions in ways that could lead to personal gain or advantage of any kind.

Conflict of Commitment: A conflict of commitment arises when a member undertakes external commitments which burden or interfere with the member’s primary obligations and commitments to Cornell.

University employees who accept full-time appointments have a primary commitment to the University and must be sensitive to the possible adverse effects of their external activities. Part-time employees commonly have major obligations and commitments to outside agencies and therefore must exercise special care in disclosing and fulfilling their multiple obligations.

Members involved in the following duties must be particularly conscious of possible conflicts or the appearance of such conflicts: the procurement, exchange or sale of goods, services or other assets, the negotiation or formation of contracts or other commitments affecting the assets or interests of the institution, the handling of confidential information and the rendition of professional advice to the University.

Einaudi Center staff members who engage in activities that may be viewed as conflicts under Cornell’s policy should discuss the nature of the conflicts with their supervisor to determine whether more formal disclosure is required. Examples of such activities may include: substantial paid consulting at other institutes or organizations; external managerial responsibilities (excluding self-employment); holding or having family who hold an equity interest or policy position in any business related to your professional activities at Cornell; use of Cornell facilities, equipment, or staff services to support consulting at a for-profit business or some other commercial activity; having, or having a family member who has, a financial interest in any contract, sale, or other transaction that you are aware of to which Cornell was a party and whose outcome you had any perceived ability to influence.

IV. Employee Certification:

I am familiar with the policies referenced in this document and agree to carry out my responsibilities within the confines of the policies as described herein. I understand that a violation of these policies could result in disciplinary action, which may include termination of employment by Cornell.

Signatures:

Employee _____ Date _____ Supervisor _____ Date _____

Name (Print) _____

Name (Print) _____