



# WAYNE COUNTY POLICY STATEMENT

<b>Title:</b>	Confidential Information		
<b>Wayne County Policy #</b>		<b>Date Issued:</b>	
<b>Category:</b>		<b>Date Revised:</b>	6/5/2026
<b>Approved By:</b>	Donna Wilson, Director of Personnel / Human Resources (P/HR)		Page 1 of 4

## I. PURPOSE

This policy is enacted to ensure the safety, security and privacy of employees, residents and institutional and business partners of Wayne County. As such, the goal of this policy is to ensure that personal, private and/or proprietary information generated, obtained and/or stored in County systems shall not be disseminated, knowingly or otherwise, by County employees with access to such information.

## II. POLICY PROVISIONS

Confidential information, including but not limited to any documents, files, records, or correspondence (tangible or electronic), delivered to or accessible by an employee during their employment with the County, remains the exclusive property of the County and shall be kept in strict confidence.

Confidential information shall not be disclosed to anyone other than other employees of the County as it may be necessary for an employee to perform their duties. Upon separation, resignation or retirement, any and all confidential information remains the property of Wayne County.

## III. CONFIDENTIALITY IN INVESTIGATIONS

Wayne County has a compelling interest in protecting the integrity of its investigations. In every investigation, Wayne County has a strong desire to protect witnesses from potential harassment, intimidation and/or retaliation, to keep evidence from being destroyed, to ensure that testimony is not fabricated, and to prevent suppression of evidence. Employees who do not maintain confidentiality may be subject to disciplinary action up to and including termination.

Nothing in this policy is intended to impede, abrogate or otherwise curtail the legal rights or obligations of any Wayne County employee, vendor or contractor.

## IV. CONFIDENTIAL HEALTH INFORMATION

Confidential information may, when appropriate, be considered Protected Health Information (PHI) under the Health Insurance Portability and Accountability ACT (HIPAA). The Freedom of Information Act (FOIA), which provides the public with the right to request access to records from governmental bodies, provides for the exclusion of categories of information that may be violative of HIPAA or may infringe upon the personal privacy of an individual, among other exemptions and exclusions. The FOIA provides

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that when processing requests, covered entities should withhold information only if they reasonably foresee that disclosure would harm an interest protected by an exemption, or if disclosure is prohibited by law.

## V. CONFIDENTIAL PERSONAL IDENTIFIABLE INFORMATION

Personally identifiable information (PII) refers to any information that can be used to identify an individual, either directly or indirectly, and it is crucial to protect this information to prevent identity theft and privacy breaches. **Examples of PII include, but are not limited to:**

- Full name
- Home or mailing address
- Date of birth
- Social Security Number
- Driver's license or state identification number
- Employee identification numbers
- Financial or banking information
- Medical or health-related information
- Email address or phone number when linked to an identifiable individual
- Any combination of data that could identify a specific individual

### Confidentiality Requirements

Employees, contractors, temporary staff, interns, and authorized third parties must:

- Access PII only when necessary to perform official job duties.
- Use PII solely for authorized business purposes and never for personal or non-official reasons.
- Safeguard PII from unauthorized access, disclosure, alteration, or destruction.
- Store PII securely, including locking cabinets, using encrypted systems, and following secure transfer protocols.
- Share PII only with authorized individuals or agencies that have a legitimate business need and legal right to the information.
- Immediately report any suspected or actual breach of PII to a supervisor.

### Prohibited Activities

Employees must not:

- Disclose PII to unauthorized persons, including coworkers without a business need.
  - Discuss PII in public or unsecured locations.
  - Leave printed documents with PII unattended.
  - Email PII without approved encryption tools.
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- Store PII on personal devices or cloud services.
- Remove PII from agency premises without written authorization.

### Retention and Disposal

- PII shall be retained only for the period required by applicable laws, regulations, and records retention schedules.
- When disposal is authorized, PII must be destroyed in a manner that prevents reconstruction, including:
  - Shredding paper documents,
  - Secure deletion or wiping of electronic data, or
  - Using approved destruction vendors.

## VI. CONFIDENTIALITY OF SECURE WORK LOCATIONS

Wayne County employees that have access to secure work location information shall be limited to individuals with a legitimate business need. Any unauthorized disclosure, whether intentional or accidental, may result in disciplinary action up to and including termination, and may also result in civil or criminal liability where applicable.

Employees may have access to information regarding secure, restricted, or non-public work locations, including but not limited to remote work addresses, secure facilities, confidential offices, or alternative duty locations. The confidentiality of these locations is critical to maintaining employee safety, operational security, and organizational integrity.

### Secure Work Locations may include:

- Remote or alternate duty locations
- Confidential or restricted offices
- Facilities requiring controlled access
- Temporary or emergency work sites

Employees must:

- Safeguard all information related to secure work locations
  - Use secure systems when transmitting approved location-related information
  - Immediately report any suspected or actual breach of confidentiality
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## VII. DISCLAIMER

If this policy is in direct conflict with other internal or departmental policy, this policy will be considered to be the overriding policy unless otherwise directed by the Director of Personnel/Human Resources or his/her designee.

In the event that any provision of these policies is in conflict with the terms and conditions of existing collective bargaining agreements (CBA), the terms and conditions of the CBAs shall take precedence. On those topics where the CBA is silent, the provisions of this policy shall apply. This policy revision shall replace any previous policies published under the same title and/or number.

Nothing in this policy is intended to impede, abrogate or otherwise curtail the legal rights or obligations of any Wayne County Employee.

## VIII. RELATED DOCUMENTS

- a. Collective Bargaining Agreements
- b. Wayne County Charter
- c. Ordinance – Ethics No. 2014-734
- d. Ethics Acknowledgement
- e. Code of Conduct Policy
- f. Wayne County Employee Handbook
- g. Freedom of Information Act (FOIA) Policy
- h. HIPPA Privacy Policy

## IX. REVISION HISTORY

ACTION	DATE	BY WHOM	REASON
Created	N/A	PHR Director	
Revised	6/5/2026	Donna Wilson, Director of PHR	Updated