

Section: Administration		Number: 1.1.2
Title: Confidentiality and Non-Disclosure		Supersedes: N/A
Effective Date: 4/24/2017	Revision Date: ---	Page 1 of 2

1.1.2 Confidentiality and Non-Disclosure

PURPOSE

The purpose of this policy is to affirm the importance of protecting confidential, privileged, or personal information obtained in the course of official COPA duties.

EMPLOYEES AFFECTED

This policy affects all COPA employees. To the extent that COPA employees are covered by a collective bargaining agreement, this policy does not override applicable contractual provisions.

RELATED INFORMATION

- [City of Chicago Personnel Rules](#)
- Municipal Code of Chicago, § 2-156-070
- [1.3.5 External Requests for Information / FOIA](#)

DEFINITIONS

Term	Meaning
Need to Know	The requirement of a person or organization to know, access or possess privileged or confidential information that is critical to the performance of an authorized, assigned matter.
Ethics Officer	The COPA General Counsel or his or her designee.

POLICIES

1. Applicable Law: The Municipal Code of Chicago, § 2-156-070 (Ethics Ordinance) and the City of Chicago Personnel Rule Section XVIII (44) prohibits City employees from using or disclosing confidential information gained in the course of their employment, except in the course of their official duties.
2. COPA employees have a duty to protect against any unauthorized use or disclosure of confidential, non-public, privileged, or personal information obtained in the course of their employment. As part of that duty, COPA employees must not access confidential, privileged, or personal information in the possession, custody, or control of COPA, except for an official purpose in connection with an official and duly authorized matter to which the COPA employee is assigned or detailed.

3. At the outset of their employment and annually at the beginning of each year, all COPA employees must sign a “Confidentiality and Non-Disclosure Agreement” (see Appendix 1.1.2A) governing an employee’s use or disclosure of information related to investigative matters and related materials. Except as provided by law, confidential, non-public, privileged, or personal information obtained in the course of their COPA employment, or access such information other than on a need to know basis. All COPA employees are subject to disciplinary action up to and including discharge, and may be subject to other legal sanctions, such as criminal charges or fines, for any violation.
4. COPA employees must not comment on the existence, status, or details of an investigation without express permission by the Chief Administrator, or his or her designee.
5. COPA employees must not comment on any of their work with any individuals outside of COPA without express permission by the Chief Administrator, or his or her designee.
6. COPA employees should direct any questions about this policy to the Ethics Officer, or his or her designee.

EXCEPTIONS

N/A

PERFORMANCE MEASURES

N/A

FORMS

- [Appendix 1.1.2A: Confidentiality and Non-Disclosure Agreement](#)