

Confidentiality Policy
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**HOMER FOUNDATION
CONFIDENTIALITY POLICY AND PROCEDURE 01-04 v.8.23.23**

The purpose of this statement is to express the position of the Foundation on confidentiality.

The Homer Foundation recognizes that the efficient operation of the Foundation requires the maintenance and management of extensive donor and prospect records. These records may contain sensitive information that has to be shared with or developed by the Foundation staff on a confidential basis. The Homer Foundation, its board members, staff, and volunteers, have an ethical and legal obligation to respect the privacy of our constituents and to protect and maintain the confidentiality of all information and records about our constituents we may create in the course of providing services to them. Additionally, care must be taken to preserve the confidentiality of discussions that take place and information that is shared in the course of conducting Foundation business. Protecting donor confidentiality is an essential part of providing good service to the donors.

Confidentiality of Records:

Staff shall be responsible for maintaining the confidentiality of donors and prospect records, as well as fund information. Staff will make records available to board members, legal counsel, and other contractors authorized to review donor/prospect and fund records as required, to assist them in executing their specific responsibilities. All persons accessing donor/prospect or fund records in the conduct of Foundation business shall maintain the confidentiality of said records. This applies to Agency Endowments as well as other types of funds. Staff may share information with donors, fund beneficiaries, and grantees pertaining to their own gifts, funds, grants, etc.---

Publication of Donor Names:

Unless otherwise requested by the donor, the names of all individual donors may be printed in the Foundation’s annual report and in other appropriate listings. The Foundation will not publish the amount of any donor’s gift without the permission of the donor as expressed in the Donor Confirmation Sheet. Unless otherwise specified in the document, donors making gifts to the Foundation by bequest or other testamentary device are deemed to have granted such permission.

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 donors. Gift amounts are not to be released without the express consent of the donor.

Anonymous Gifts:

The Foundation is authorized to accept anonymous gifts and to handle them appropriately. The name of the donor may be withheld from the Public if so requested by the donor. When made known to board members they will respect the anonymity of any such gift. Under the following conditions anonymous donations could be restricted to executive staff and an Officer of the Board.

1. The donor specifically requests the highest level of anonymity; and
2. The gift is cash or equivalent; and
3. The staff and board officer present a finding to the board that the donor is known to them and that the donation would otherwise meet all requirements of the gift acceptance policy.

No Disclosure 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 disclosure of such information, including address and demographic information, shall be made to third parties without the donor's consent.

Confidentiality of Foundation Business:

Discussions that take place in the context of the Foundation's operations require discretion, including discussions pertaining to grant-making, 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 Foundation meetings and processes. Likewise, the content of Foundation business, including documents or Foundation analysis or documents, should not be discussed or shared outside official meetings and processes.

All non-board member volunteers shall sign a confidentiality agreement upon joining any Homer Foundation committees. Committee chairs will review the confidentiality agreement each January with their entire committee.

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 tax returns. This Confidentiality Policy shall not be construed in any manner 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 information of a private nature, including but not limited to all items explicitly discussed in this policy.