

# UPC Privacy Policy

## 1. Purpose

The purpose of this policy is to provide guidance to University Presbyterian Church (UPC) staff in the use and handling of giving information. Five areas are addressed by this policy: gift acknowledgment, opt-out requests, communication with current supporters, communication with potential supporters, and data access. The main guiding principle in this policy is that congregant data be managed in a way that preserves and enhances the relationship with UPC. This policy is intended to be dynamic, as the need arises to address related issues. Only the UPC Session has the authority to amend, revoke, or add to this policy.

## 2. Revision History

Date	Revision	Modification	Approved By
8/28/07	1.0	New Document	Session

## 3. Persons Affected

UPC staff (paid and unpaid), consultants, and congregants

## 4. Policy

### 4.1. Gift Acknowledgment

#### 4.1.1. Timely Acknowledgment

Every trackable gift of time or money will be acknowledged in a timely manner, in writing. Gift acknowledgment should occur in some form **other than** an annual giving statement. Each ministry is responsible for determining its own schedule for timely gift acknowledgment.

#### 4.1.2. Form of Acknowledgment

Gift acknowledgment may occur in various ways, ranging from personalized communications that mention the giver's name, to generic communications to a broad audience that do not mention givers' names. Examples of personalized communications include a quarterly giving statement, a letter, or an e-mail.

Meanwhile, examples of generic communications include the Sunday bulletin, church newspaper, or web site. All of these examples are permissible forms of gift acknowledgment.

## 4.2. Opt-Out Requests

All requests by congregants to be taken off mailing lists will be honored.

## 4.3. Communication with Current Supporters

### 4.3.1. Definitions of “Consent” and “Supporter”

Congregant **consent** to receive communication regarding a specific ministry **is assumed** at the point that a congregant expresses interest verbally in person, by phone, in writing, or in the form of a financial or non-financial gift to that ministry. When a person expresses interest, that person becomes a **supporter**.

### 4.3.2. Level of Communication

UPC may (and should) communicate with people regarding ministry they have supported in the past. Such communication may include reports and requests for continued support.

### 4.3.3. Stewardship Director’s Assistance in Communication with Current Supporters

The Stewardship Director shall assist in the acknowledgment of large gifts, and in confirming the intended designation for large, restricted gifts. The definition of a large gift may vary from department to department, so it is important for the Stewardship Director and each department to maintain a common understanding of what constitutes a large gift.

## 4.4. Communication with Potential Supporters

### 4.4.1. Instances in which consent is **not** required

#### **(a) When Information Is Disseminated Broadly**

Communication with potential supporters of ministry is generally permitted without their consent in situations where information is disseminated broadly, with the intent to reach **all** congregants. Permitted examples of types of communication include worship service announcements, bulletin inserts, the church newspaper, the church web site, special offerings, and all-church events such as the World Markets fair and YMM Auction.

#### **(b) When Information Is Disseminated Between Individuals**

Communication with potential supporters of ministry is generally permitted without their consent in situations where information is disseminated between two or more individuals, and is done primarily on

the basis of an established relationship between those individuals, rather than a shared affiliation with UPC. *For example, it's OK to invite a friend to support a ministry, but it's not OK to invite someone you only know is wealthy and do not know personally.*

#### **(c) When the Request Is for Volunteers (or a Contribution of Time)**

Communication with potential supporters of ministry is generally permitted without their consent in situations where a request is made for volunteers, or a contribution of time.

#### **4.4.2. Instances in which consent is required**

When individual congregants are not current supporters of a specific ministry, **consent is required** from those congregants before department-initiated solicitations of a financial or in-kind gift may be delivered to them in a targeted manner, such as a mailing, phone call, or e-mail. This requirement also applies to invitations to events where financial or in-kind gifts are solicited. For information on how consent to solicitation is provided, see the definition of consent in section 4.3.1.

*For example, it's OK for Youth Ministries to contact its supporters regarding financial support of a joint initiative with University Ministries, but it's not OK for Youth Ministries to give a copy of its list of supporters to University Ministries and thus enable University Ministries to solicit a financial gift from supporters of Youth Ministries.*

#### **4.4.3. Exceptions**

The limit described in section 4.4.2 applies to campaigns for specific ministries, but not broad-based campaigns such as a capital campaign. Any other proposed exception must be submitted to a committee comprised of the Stewardship Director, Treasurer, and Executive Pastor, and will be considered on the basis of whether it preserves and enhances the targeted congregants' relationship with UPC. Any such exception granted will be for a single instance, until this policy document is amended to state the conditions for an ongoing exception.

### **4.5. Data Access**

#### **4.5.1. Unlimited Access**

Unlimited access to congregant giving information is permissible for the following people, on the condition that all such information is held in confidence:

- The staff of the Finance and Information Services departments
- The Executive Pastor
- The Stewardship Director.

Such access is granted in order that these people may fulfill their job responsibilities. These people cannot do their jobs without access to this information.

#### 4.5.2. Restricted Access

Restricted access to congregant giving information is defined as no access to gift amounts of specific individuals, but access to other information, including names, contact information, designation, gift frequency, and total combined giving from all individuals to departments and ministries.

Part of the scriptural basis for this restriction comes from the following verses:

- James 2:2-4 regarding **favoritism**: *Suppose a man comes into your meeting wearing a gold ring and fine clothes, and a poor man in shabby clothes also comes in. If you show special attention to the man wearing fine clothes and say, "Here's a good seat for you," but say to the poor man, "You stand there" or "Sit on the floor by my feet," have you not discriminated among yourselves and become judges with evil thoughts?*
- Luke 21:1-4 regarding the spiritual value of the **widow's mite**: *As he looked up, Jesus saw the rich putting their gifts into the temple treasury. He also saw a poor widow put in two very small copper coins. "I tell you the truth," he said, "this poor widow has put in more than all the others. All these people gave their gifts out of their wealth; but she out of her poverty put in all she had to live on."*

Restricted access is permissible for the following people, on the condition that all such information is held in confidence:

- Department heads
- Staff (both paid and unpaid) designated by department heads.

If someone personally chooses to disclose his or her own gift information to individual UPC staff, and grants permission to share this with others, the restriction described here applies in all other instances.

#### 4.5.3. Prohibited Access

For all other individuals besides those listed above, access to congregant giving information, other than their own personal giving, is prohibited.

## 5. Principle

In any situation that may arise, congregant data will be managed in a way that preserves and enhances the relationship with UPC.

## 6. Procedure

Those who are eligible to receive access to others' giving information must sign a confidentiality agreement before they can view such information. Copies of signed agreements are to be kept on file in the Finance Department. The administration of the Giving Information Policy is the responsibility of the Stewardship Director, with assistance from the Finance Department and the Information Services Department.