

**UNIVERSITY OF FLORIDA**  
**INFORMATION PRIVACY POLICIES & PROCEDURES**  
**OPERATIONAL GUIDELINES**

**Reporting, Investigating, and Responding to Privacy Violations (continued)**  
**Recommended Sanctions for Violations of Privacy by Students** Revised 08/15/2007

Level of Violation	Cause or Motivation	Type of Violation	Examples of Violations	Recommended Actions
<u>Level I</u> Errors in handling Restricted or Sensitive information, or in maintaining workstation security measures.	Unintentional <ul style="list-style-type: none"> <li>• Lack of training</li> <li>• Inexperience</li> <li>• Poor judgment</li> <li>• Poor process</li> </ul>	<ul style="list-style-type: none"> <li>• Clerical Error</li> <li>• Process Error</li> <li>• Technical Error</li> <li>• Judgment Error</li> </ul>	<ul style="list-style-type: none"> <li>• Leaving an active computer screen with access to PII unattended.</li> <li>• Leaving PII, in any format, unattended in public areas.</li> <li>• Disclosing PII without identity verification.</li> <li>• Sending PII to wrong postal or e-mail address</li> <li>• Placing non-shredded documents in inappropriate waste receptacles</li> </ul>	<ul style="list-style-type: none"> <li>• Retraining and re-evaluation.</li> <li>• Specialized training and evaluation.</li> <li>• Discussion of policy and procedures.</li> <li>• Verbal warning or oral reprimand.</li> <li>• New Confidentiality Statement signed</li> <li>• Community Service, as appropriate</li> </ul>
<u>Level II</u> Breach in the terms of the Confidentiality Statement and/or UF policies concerning use and disclosure of Restricted or Sensitive Information.	Intentional, but non-malicious <ul style="list-style-type: none"> <li>• Curiosity</li> <li>• Concern</li> <li>• Compassion</li> <li>• Carelessness</li> <li>• Compulsiveness</li> </ul>	<ul style="list-style-type: none"> <li>• Un-authorized</li> <li>• Non-job-related</li> <li>• Stealth</li> </ul>	<ul style="list-style-type: none"> <li>• Failure to complete required Privacy Training, and/or to sign the UF Confidentiality Statement.</li> <li>• Discussing PII in public or other inappropriate areas.</li> <li>• Accessing the record of any person, including co-workers, friends, or family, without professional Need-to-Know</li> <li>• Using someone else's computer account.</li> <li>• Copying information as a favor</li> <li>• Installing unauthorized software with potential to harm systems.</li> <li>• Adding, deleting, or altering electronic information without authorization.</li> <li>• Repeated Level I violations</li> </ul>	<ul style="list-style-type: none"> <li>• Letter of Reprimand, requiring written corrective action plan &amp; acknowledgement of consequences of subsequent infractions; i.e., expulsion, and obligation to make restitution, as appropriate.</li> <li>• Loss of University privileges, including use of University library, parking, computers, and athletic / entertainment functions.</li> <li>• Conduct Suspension</li> <li>• Contract of Restitution</li> </ul>
<u>Level III</u> Breach in the terms of the Confidentiality Statement and/or UF Policies concerning use and disclosure of Restricted or Sensitive Information, for personal gain or to affect harm on another person.	Malicious intent <ul style="list-style-type: none"> <li>• Financial gain</li> <li>• Revenge</li> <li>• Protest</li> </ul> Gross Negligence	<ul style="list-style-type: none"> <li>• Theft, including Identity theft</li> <li>• Malicious actions: i.e., <ul style="list-style-type: none"> <li>○ alteration or deletion of data,</li> <li>○ making data or systems inaccessible</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Access and unauthorized disclosure of PII for personal gain or to affect harm on another person.</li> <li>• Unauthorized access of celebrity or VIP PII for any reason.</li> <li>• Malicious alteration, deletion or removal of PII, from UF facilities.</li> <li>• Unauthorized publication or broadcasting of PII.</li> <li>• Repeated Level I or II violations</li> </ul>	<ul style="list-style-type: none"> <li>• Expulsion without opportunity to continue at the University in any status, and ineligible for University privileges, including use of University library, parking, and entertainment / athletic functions.</li> <li>• No Contact Order</li> <li>• Contract of Restitution</li> </ul>