DISCLOSURE OF SENSITIVE OR CONFIDENTIAL INFORMATION IN PROCEDURAL MANUALS

This audit alert is a reminder to not disclose sensitive or confidential information within your organization’s procedural manuals. These manuals are not considered confidential documents and could be reviewed by persons outside your office or by the general public. Disclosing confidential information could violate privacy laws and circumvent controls that provide security over County assets.

Recently, we identified an instance where a copy of a citizen’s check was used as an example within a cash handling manual. The citizen’s actual name, address, and checking account information was clearly shown. The citizen’s private information was readily available to anyone who reads the manual.

In another instance, the key location to a locked cash drawer was disclosed in a cash handling manual. If the manual is read by anyone other than cashier personnel within that department, the security over the cash on hand would be compromised.

The County has a fiduciary responsibility to protect the personal information of the citizens who do business with the County. Placing sensitive and confidential information in operation manuals and instructions that can be shared with individuals outside your office could inadvertently violate privacy laws and provide the information needed to perform an act of theft.

CITIZENS’ PRIVATE INFORMATION SHOULD ALWAYS BE SAFE-GUARDED AGAINST DISCLOSURE AND BUSINESS SENSITIVE (NEED TO KNOW) INFORMATION SHOULD BE MAINTAINED APART FROM READILY AVAILABLE DOCUMENTS.

For additional information, contact the Internal Audit Department at internalaudit@cobbcounty.org or (770) 528-2556.