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OCI Confidentiality Procedures	ACA Standards: 4-4456		
Joe M. Allbaugh, Director Oklahoma Department of Corrections		Signature on File	

Oklahoma Correctional Industries (OCI) Confidentiality Procedures

It is the policy of the Oklahoma Department of Corrections (ODOC) that Oklahoma Correctional Industries (OCI) operations provide for the safe, secure, and prompt handling, storage, and transfer of customer documents, and the proper storage, transfer, and or transmittal of its data. This procedure establishes authority, responsibility, confidentiality and accountability for handling customer documents, data, and intellectual property. (4-4456)

I. Applicability

This procedure pertains to all documents or other media given, or transferred electronically to Oklahoma Correctional Industries (OCI) by customers for the purpose of encoding, conversion, reproduction, storage, or other processing. OCI's responsibility begins with receipt of the customer's data. This responsibility continues while the document or other media, and the information acquired during processing remains with OCI.

II. Procedures

A. Pickup/Delivery

All documents, data, and/or intellectual property received from a customer will be secured during transit to prevent loss or theft. Upon receipt, the OCI driver, or other employee, will reconcile the delivery documents with the quantity and nature of the materials. The responsible factory manager will establish an audit trail that makes it possible to determine all persons having possession of, or access to, the materials. Return or delivery of materials is documented on a bill of lading with a customer's signature.

B. Processing

Written procedures are established by the factory manager to track location and time of possession of all customer documents and data. A log indicating time out and in, name of individual and purpose of possession will be maintained by the OCI manager. To minimize the possibility of loss or compromise, all documents or data will be secured in boxes or other containers and access to those containers will be limited to designated staff and inmates. All logbooks and other forms documenting possession or access will be retained in the factory as a permanent document.

C. Personnel

All staff and inmates with access to customer documents or data will be required to sign the "Confidentiality Agreement" ([Attachment A](#), attached). Inmates will be made aware of the importance of security of information. No data will be copied, memorized, relayed to others, or in any other manner, removed from OCI premises, except by OCI personnel when required by agreement with the customer or as required by statute. OCI factory managers maintain written procedures prohibiting the removal of customer documents or data from OCI premises. Procedures may include, but are not limited to; pat searches and other security measures, restriction on movement of material, shakedown of inmates and their individual work areas, gate/entry access, and strict control of movement within OCI facilities.

D. Disciplinary Procedures

Any breach of confidentiality will be considered a violation of this procedure and will require immediate disciplinary action. Removal or attempted removal of data, customer documents, or supplies and equipment from OCI is considered a serious offense. Such offenses will be documented and referred through the director of OCI and the correctional industries coordinator to institutional staff and, if applicable, referred to the office of the Inspector General's for further investigation. OCI staff will complete incident and misconduct reports as necessary in accordance with [OP-060125](#) entitled "Inmate/Offender Disciplinary Procedures" and submit them to facility staff for review and processing.

E. Security of Materials

All materials entrusted to OCI will be secured in the appropriate OCI facility under the direct control of OCI supervisors. No access will be granted unless accompanied by OCI personnel or in the event of an emergency. Access to industry buildings during non-work hours will be restricted to necessary security or safety functions. Any access outside OCI working hours will be documented in the security shift log, which reflects the time, purpose, individuals involved, and materials moved and/or disturbed.

F. Reporting

All violations of confidentiality will be documented and a written report will be submitted to the industries coordinator who will immediately report the incident to the director of OCI.

III. References

Policy Statement No. P-080100 entitled "Mission and Management of Correctional Industries."

OP-060125 entitled "Inmate/Offender Disciplinary Procedures"

IV. Action

The director of Oklahoma Correctional Industries is responsible for compliance with this procedure and for the annual review and revisions.

Any exceptions to this procedure will require prior written approval from the agency director.

This procedure is effective as indicated.

Replaced: Operations Memorandum No. OP-080105 entitles "Oklahoma Correctional Industries (OCI) Confidentiality Procedures" dated June 17, 2014

Distribution: Policy and Operations Manual
Agency Website

Attachments

Title

Location

[Attachment A](#)

"Confidentiality Agreement"

Attached