



Type: Administration & Operational Policies
Authority: Board
Related Documents: POL-305 Employment Records

Purpose

The adoption of a document retention policy serves to notify employees, officers, and directors of the time periods for which documents should be maintained and helps to guard against improper disposal or destruction of documents in error, or with the intent of obstructing an investigation. It also safeguards personal information contained in files by guiding staff in the appropriate storage and handling of files.

Policy Statement

1. Grey Bruce Hospice Inc. (GBH) will uphold its obligations to preserve information following the legislated timelines.
2. GBH will ensure that confidential information is stored securely in a locked storage room, filing cabinet and/or password protected electronic form at all times. Electronic files may also have levels of restriction implemented on users.
3. In the normal course of activities, staff will not remove confidential information from the property. In exceptional circumstances (court, audit), where documents must be transported, employees must take every precaution to ensure that confidentiality is maintained.
4. The Executive Director may issue a notice, known as a "legal hold," suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Executive Director.

| 401.01 Repeal Former HR Policies | | |
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| File Category | Item | Retention Period |
| Corporate Records | | |
| | Bylaws and Articles of Incorporation | Permanent |
| | Corporate resolutions | Permanent |
| | Board and committee meeting agendas and minutes | Permanent |
| | Conflict-of-interest disclosure forms | 4 years |
| Finance and Administration | | |
| | Financial statements (audited) | Permanent |

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| | Auditor management letters | 7 years |
| | Payroll records | 7 years |
| | Cheque register and cheques | 7 years |
| | Charitable contributions, including tax receipts and donor information | 7 years |
| | Sponsorships | 7 years past the life of the sponsorship |
| | Bank deposits and statements | 7 years |
| | Chart of accounts | 7 years |
| | General ledgers and journals (includes bank reconciliations) | 7 years |
| | Investment performance reports | 7 years |
| | Equipment files and maintenance records | 7 years after disposition |
| | Contracts and agreements | 7 years after all obligations end |
| | Correspondence — email | 3 years as active Archive of past employees for 1 year |
| | Correspondence — general | 3 years |
| Insurance Records | | |
| | Policies — occurrence type | Permanent |
| | Policies — claims-made type | Permanent |
| | Accident reports | 7 years |
| | Safety reports | 7 years |
| | Claims (after settlement) | 7 years |
| | Group disability records | 7 years after end of benefits |
| Real Estate | | |
| | Deeds | Permanent |
| | Leases (expired) | 7 years after all obligations end |
| | Mortgages, security agreements | 7 years after all obligations end |
| Tax | | |
| | T3010 Charity Information Return | Permanent |

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| | Annual Information Return (Ontario) | Permanent |
| | Charitable Organizations Registration Statements | 7 years |
| Human Resources | | |
| | Employee personnel files | 7 years after employee has stopped working for employer. |
| | Recruitment, Applications, and Interview materials | 1 year from Call |
| | Retirement plan benefits (plan descriptions, plan documents) | Permanent |
| | Employee handbooks | Permanent |
| | Workers comp claims (after settlement) | 7 years |
| | Employee orientation and training materials | 7 years after use ends |
| | Withholding tax statements | 7 years |
| | Timecards | Through audit of calendar year |
| Technology | | |
| | Software licenses and support agreements | 7 years after all obligations end |
| Volunteer Files | | |
| | Volunteer Personnel Files | 3 years after Volunteerism ends |
| Medical Records | | |
| | Adult Medical Records | 10 years after residency |
| | Pediatric Medical Records | 10 years after the age of 18 years |

401.02 Electronic Documents and Records

1. Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time.
2. If a user has sufficient reason to keep an e-mail message outside of the standard active email duration, the message should be retained in the appropriate drive and folder or moved to an "archive" computer file folder.
3. Backup and recovery methods will be tested on a regular basis.

401.03 Emergency Planning

GBH records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the organization operating in an emergency will be duplicated or backed up and maintained on or off-site.

401.04 Document Destruction

The Executive Director is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding. Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation. All documents to be discarded must be destroyed in a secure manner.

401.05 Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the organization and its employees and possible disciplinary action, or even termination, against responsible individuals.

401.06 Client/Resident’s Records

Once a resident is discharged/deceased, any paper medical record will be placed in a locked storage awaiting digitization and shredding. Retention will follow the Schedule in section 1.

301.07 Review Cycle

All Administrative policies shall be reviewed in the even year.

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| Original Approval: 10-26-2022 |
| Reviewed On: |
| Revised On: |