



6.D-2008 Human Resources Records Policy

1. Purpose

To ensure employee records are held and maintained in a manner that respects the privacy of employee information, is confidential and meets the privacy rules in Alberta's *Personal Information Protection Act*.

2. Policy

St. Mary's University (University) strives to protect the privacy of employees and maintain the confidentiality of employees' personal information. The University accepts the responsibility of keeping all records pertaining to employees out of the hands of those who would use the information for illegitimate purposes.

This policy outlines the principles and practices followed in protecting the personal information of faculty and staff. This policy applies to the institution of St. Mary's University as well as any person or organization providing services on our behalf. A copy of this policy is provided to any individual on request.

3. Information Steward

The custody of employee records is vested in the Assistant Vice-President Human Resources (AVP HR) by delegation from the President's Council. As such, the APV HR has the responsibility and authority to grant or deny access to employee records, consistent with this policy. It should be stressed that the entitlement to access certain records does NOT include authority to release information from the record except as provided for in this policy. All matters pertaining to the interpretation of this policy should be referred to the AVP HR.

4. Definitions

- 4.1 **Personal information** – information about an identifiable individual, for example: name, address, telephone numbers, e-mail address.

Approval Authority	Responsible Office	Effective Date	Date Last Revisited	Review Frequency
Board of Governors	Human Resources			Every 5 years

- 4.2 **Employee Records** – Any form, report, original or microfilmed record, notes or documentation relating to or impacting the selection, status, salary, performance, benefits, disciplinary action, training, etc. of an employed, prospectively employed or separated person.
- 4.3 **Disclosure** – release of information to a third party
- 4.4 **Minimum Retention** – The minimum amount of time a particular series of records should be retained.

5. Collection of Information

The University will collect retain only the personal information of an employee which is necessary for the proper administration of the University and its academic and other programs, the administration of the employee's benefits and compensation, or is required by legislative requirements imposed by federal or provincial authority This information is normally collected directly from the employee, however some information may be collected from other persons (e.g. supervisor, referee) with the employee's consent or as authorized by law.

Typical data retained for each employee includes:

- Personal information
- Hiring documentation
- Payroll documentation
- Benefits documentation
- Leave documentation
- Evaluation documentation
- Tenure documentation
- Disciplinary or grievance documentation
- Termination documentation
- Other relevant information related to employment with the University

The AVP HR will make the final decision as to the placement of any information into an employee file.

6. Access, Use and Disclosure of Information

An employee's name, title or position, business telephone number, address, fax number and e-mail address are considered business contact information under Alberta's *Personal*

Information Protection Act and can be disclosed by the University as part of daily operations.

To preserve the privacy of employee information, access to employee records will be limited to:

- The employee who may review their own record under the supervision of the AVP HR and may request in writing the disclosure of specific pieces of information to a third-party on a one-time basis, e.g. information on years of service and annual salary to banks. Certain materials, such as reference letters or notes from a verbal consultation, may be withheld from the employee if supplied with the explicit or implicit expectation of confidence or to protect the privacy of another individual.
- The AVP HR designates who uses the information to administer benefits plans, maintain salaries and job classifications, seniority and employment records throughout an individual's career, and report statistical information on an aggregate basis. The AVP HR also uses personal information to counsel managers on appropriate management actions as well as to counsel staff and faculty on their benefits, rights and privileges within the University.
- Search committee members who will have access to documents related to the hiring process, such as resumes/cvs and reference letters, which are required as part of the decision making process.**
- The supervisor to whom the employee reports who uses the employment records to help in managing and guiding an individual's performance and career.
- Authorized officers of the University requiring access to the file for business or legal reasons.
- External agencies such as the University payroll provider and insurance carriers, Revenue Canada, Worker's Compensation, Canada Employment and Immigration Commission, etc., will be given personal information required for employees to access their services.
- Federal and provincial governments or courts and legal agencies which may request and/or require personal information on employees.

**Note: The appointment of certain academic staff members may be a more public process. If the candidate has been notified that the selection process will be made public at some stage of the competition and he or she has expressed a willingness to proceed, no further consent to disclose information is necessary. However, information should only be disclosed

on a need-to know basis and candidates should be asked to provide a c.v. that is appropriate for public distribution.

7. Information Accuracy & Security

The University makes every reasonable effort to ensure that employee information is accurate and complete. If there is a change to employees' personal information that may affect their relationship with the institution, they should contact the AVP HR. If employees believe there is an error or omission in their file, they may request in writing that the information be corrected.

The University protects employees' information in a manner appropriate for the sensitivity of the information. The University makes every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information. The University also makes every effort to ensure that appropriate privacy security measures are in place with any and all external contractors that provide payroll and benefits services.

8. Retention of Employee Records

The University retains employees' personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes. Human resources information will be retained according to the schedules below. Following the minimum retention period, the records will be destroyed using a method that preserves the confidentiality of the information.

Employee records held by offices other than Human Resources, shall retain their files for one year after termination for administrative staff and for two years after termination for academic staff; at the end of that period, the records will be sent to the AVP HR who shall retain copies of any records missing from the HR copy of the file and destroy the rest. The HR copy of the file shall then be stored in archive until the end of the minimum retention period. If an employee is not terminated, but is transferred to another office, the employee file shall be transferred to the new office from the old office immediately.

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Human Resources Management	Policies and procedures related to the administration of human resources	Until superseded or obsolete

St. Mary's University: 6.D-2008 Human Resources Records Policy

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
Classification/ Reclassification	Documents related to the classification and description of positions	Until superseded or obsolete
Unsolicited Resumes	Self-explanatory	If not considered in a search, minimum is at the discretion of the unit and maximum retention is 6 months. If considered in a search, see search documentation.
Search Documentation	Resumes of individual not hired, selection committee notes, minutes, decisions, correspondence, etc.	1 year after a decision is made for an administrative position and 2 years after a decision is made for an academic position
Main Personnel Record	Offer letters, original resume/cv, application form, copy of job posting, transcripts, criminal record checks, immigration documents including visa, performance documentation, reclassification documentation, training and development documents including training certificates, coaching/counseling documents, letters of recognition, long service information, merit records, grievance documentation, discipline documentation, legal opinion, resignation and termination letters, etc.	3 years after the date of termination
Payroll Documents	Payroll authorization forms, SIN, banking information, tax waiver forms, T4's, TD1's, letters for changes in salary and merit increases, tuition/scholarship forms, contract letters (employment terms and conditions), teaching overload contract letters, salary adjustment letters, time sheets, garnishee, special or sabbatical leave, copy of study and/or work permit,	7 years after the date of termination

St. Mary's University: 6.D-2008 Human Resources Records Policy

<i>Record Type</i>	<i>Description</i>	<i>Minimum Retention</i>
	copy of employment verification letter, record of employment, severance, etc.	
Faculty Evaluation Documents	Deal with evaluation of the teaching and scholarship provided by professors and lecturers - annual reports, student evaluations, teaching assessment reports. Includes raw data relating to evaluations (confidential) and summaries which are available for promotions and external organizations. Summaries are provided to the faculty member after grades are submitted.	10 years after the date of termination
Pension and Benefit Documentation	Pension and insurance forms, documentation and correspondence	75 years after the date of termination