

Human Resources Records Retention Policy

Category: Human Resources

Approval: PVP

Responsibility: Associate Vice-President, Human Resources

Date: September 2017

Purpose/Reason for Policy:

The Human Resources department is responsible for the administration of employment, payroll, benefits and pension, health and safety, staff training, and labour relations functions. Each of these functions requires a variety of computer and hard copies of data. Record retention is referenced in legislation under Employment Standards, Freedom of Information and Privacy regulations. This policy provides a guideline for the period of time for retaining documents as well as method of documentation destruction.

Policy Statement:

All files acquired or generated by the Human Resources Department at Trent will be maintained and/or destroyed in keeping with this policy.

Procedures:

General Records, Public:

Document/Record	Access	Retention	Location
Anonymized Surveys	Internet	Indefinite	Electronic
General Announcements			Archival Files

General Records, Intranet:

Document/Record	Access	Retention	Location
Trent HR Policies	Intranet	5 years after update	Electronic
Employee Benefit Booklets			Archival Files
Employee Assistance Program Information			

Personal Information Databanks:

- Labour Relations Files
 - Legal Authority: Trent University Act 1963 and Ontario Labour Relations Act 1995
 - Information Maintained: Trent faculty, staff, management
 - Uses: To determine legal rights of employees/employers
 - Users: HR staff and affiliated departmental manager
 - Retention: General records – Indefinite; personal records (normally) 1 year after termination of employment

Document/Record	Access	Retention	Location
Memoranda of agreements Grievance files Arbitration files/awards Labour Board files (includes Human Rights) Termination agreements Legal files Multi-University agreements OPSEU Seniority Lists	HR staff, Senior Mgmt Managers/Supervisors	Indefinitely	Where possible, files will be stored electronically. DHR Office and Archived Files in Storage
Attendance Records	HR staff, Senior Mgmt Managers/Supervisors	Records will be destroyed seven years after they are made	Files will be stored electronically.
Job Evaluation Ratings	HR staff, Senior Mgmt Managers/Supervisors, JJEC committee	Electronic rating will be kept indefinitely; hard copy files will be destroyed 5 years following a position becoming obsolete	Where possible, files will be stored electronically. DHR Office and Archived Files in Storage
Job Descriptions	Internet	To be destroyed 5 years following a position becoming obsolete	Electronic files will be kept where possible. DHR Office and Archived Files in Storage

- Payroll Information and Personnel File Including Medical files
Legal Authority: Trent University Act 1963 Revenue Canada Regulations

Information Maintained: Name, DOB, SIN, hiring date, payroll information, training files, timesheets, tax/CPP/EI information, education, leaves of absence, performance evaluations, resumes, references, career planning information, personal requests and workplace accommodations.

Individuals in Bank: Current and past Trent employees

Uses: Administration of payroll and employment

Users: HR staff and affiliated departmental manager

Retention: 7 years after departure, then shred (Electronic summary records maintained indefinitely)

- Job Competition Files

Legal Authority: Trent University Act 1963

Information Maintained: Names, resumes(applications) of interviewed external applicants, resumes (applications) of all internal applicants, interview records; may contain test results and references, copy of posting, Hiring Request Form, Appointment Letter, Job Evaluation scores, e-mail correspondence

Individuals in Bank: Job applicants

Uses: Hiring

Users: HR staff and affiliated departmental manager

Retention: Two years

- Pension Records

Legal Authority: Trent University Act 1963 and Revenue Canada regulations

Information Maintained: Pension Plan documents/contracts, compensation records,

Individuals in Bank: Current and retired Trent employees

Uses: Guarantee of individual access to contracted rights

Users: HR staff

Retention: In general, pension plan records should be kept for the life of the plan.

The risk in destroying pension plan records is inability to mount a defense in the event of litigation. Currently the two areas where litigation most often arises are:

- Surplus ownership - Trend's surplus ownership wording is clear as a result of earlier litigation. The files related to the surplus ownership litigation are stored in the Human Resources storage room and are clearly marked "Permanent files".
- Claims from former members that they did not receive pension information on termination of employment/and or a settlement of pension benefits – there is a slight risk that by destroying personnel files for pension plan members, we will be unable to confirm payment to a former employee who may come forward with a claim to pension benefits. In some cases, employers have had to make a settlement to a former member due to the lack of documentation. Since this risk is small, we will apply the seven year Canada Revenue Agency requirement.

The Trustee of the pension plan maintains records of payments for seven years.

The following are guidelines for retention of pension documents:

Type of Record	Comments	Retention Guideline
Pension plan documents and plan amendments		Permanent
Copies of Employee Booklets		Permanent
Minutes of Pension Committee Meetings		Permanent
Annual Information Returns; Audited financial statements and related working papers Actuarial Valuations	Above filed with regulatory authorities (Pension Commission of Ontario or Financial Services Commission of Ontario) for permanent retention. Back copies of these documents can be accessed for a fee. Copies of actuarial reports can be obtained from Actuary's permanent files. Current actuary, Aon was appointed in 1998 – copies of valuations from July 1, 1998 are held by Aon.	7 Plan Years (July to June)
Files for Terminated or Deceased Active Members or Deceased Retired Members where there is no survivor benefit	Since 2001, the Pension Co-coordinator has maintained a computerized master list of payments to members, including name of member, SIN, date of termination, date of payment, amount of payment and payment instructions. This process continues.	7 years from date of event (i.e. termination date, date of death). Master lists of payments– Permanent
Pension Adjustments	Calculated annually; appear on T4's. Master lists provided to Pension Co-coordinator	7 Years
PAR Filings	Most members who terminate employment, and receive a settlement, are assessed a Pension Adjustment Reversal which restores RRSP contribution room. The PAR is filed with Canada Revenue Agency (copy to the member). CRA will report the restoration of RRSP contribution room directly to the member on the annual Notice of Assessment.	7 Years from date of filing
General Pension Files	From time to time special programs are introduced – past service purchase; VER; early retirement window.	Permanent

Contact Officer:

Associate Vice-President, Human Resources

Date for Next Review:

January 2021

Related Policies, Procedures & Guidelines

- a) N/A

Policies Superseded by This Policy:

- a) N/A