

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-9

Effective Date: 06-17-98

SUBJECT: Personnel Files

Revision Date: 07-09-09

To ensure the privacy of personal information, personnel files are maintained in a confidential, secure manner in the Human Resources Department. All personnel files are the property of LOYOLA. The personnel files in the Human Resources Department are the official documentation with respect to all personnel transactions and supersede other files if contradictions exist.

All information maintained in an employee's personnel file is limited to information required for business or legal purposes and in accordance with Equal Employment Opportunity Laws and other state and federal regulations.

Contents of Personnel Files

Personnel files are maintained on all LOYOLA employees. Each employee file may contain the following:

- Completed Application for Employment
- Reference Checks
- Pre-employment Testing when required by job
- Certification when required by job
- Orientation Checklist
- Federal Withholding Exemption Form
- State Withholding Exemption Form
- Direct Deposit Authorization
- Three Month Evaluation
- Letters of Commendation
- Performance Counseling / Disciplinary Record
- Human Resources Status Change Form

Employee files will not contain any of the following:

- Medical History
- Medical LOA Information
- COBRA Information
- Picture Identification
- Short Term / Long Term Disability Information
- Benefits Enrollment Forms
- Garnishments
- Pension Plan Beneficiary Designation
- I9 Form
- Doctor's Notes regarding employee absence or illness
- Worker's Compensation Claims

Internal Access to Personnel Files

Access to employee files is restricted to the following individuals and may be reviewed only in the Human Resources Department.

- Human Resources employees with a business need-to-know have full access.
- Selected employees may have access to particular sets of data such as, FSA account, payroll, etc.
- The employee's immediate supervisor.
- A supervisor considering an employee for a transfer.
- Corporate officers may have access to personnel files of persons lower in rank than themselves.

Employee Access to Personnel Files

All current employees may be permitted to review their personnel file.

- The personnel file may only be reviewed in the presence of the Human Resources Manager during normal business hours. The employee must call to make an appointment. The files may not be removed from the Human Resources Department.
- Photocopying of personnel documents is not permitted.
- The employee will not be provided access to letters of reference.

Reporting Changes to an Employee's File

In order to maintain accurate and current personnel files on employees, employees must report changes in name, address, telephone number, withholding deductions, and person to contact in case of emergency.

Storage of Personnel Data

Hard copy - Personnel documents are stored in folders by individual employee's name. Folders are kept in secure files or in a secure room to prevent unauthorized access.

Computer Memory - Any computer files that contain personal data about employees or salary information is afforded all possible security. If protection against unauthorized access cannot be assured for data remaining in hardware components, which are physically located with or connected to the computer, the files will be written out to a tape or a removable disk for secure storage.

Destruction of Personnel Files

All personnel files and confidential employee data maintained by Human Resources will be destroyed by shredding after retention dates have passed. Application materials submitted by applicants for employment who were never employed will also be shredded.

Employee Health Data

If information concerning an employee's health or physical condition must be collected, i.e., to process disability claims, a separate file must be maintained with access restricted only to those employees whose job directly relate to health information. The information contained in these files can only be released with written permission of the employee or his/her authorized agent.

Requests for information concerning workers compensation cases are handled by the Human Resources Department for referral to legal counsel.

Subpoenas or requests claiming a legal basis for the information are to be handled by the Human Resources Department for referral to legal counsel.

The Human Resources Department handles questions concerning industrial accidents and/or employee work limitations.