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## **Record Retention and Destruction Policy and Procedure**

### Policy

It is the policy of Goodwill Industries of Northwest Ohio to retain records as required by law, funding sources, or by prudent business practices and to destroy them when appropriate. It is against policy for any employee or volunteer to knowingly alter, destroy, mutilate, conceal, cover up, falsify, or make a false entry in any record or document with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any law-enforcement agency of federal, state, or local government.

### Procedure

If it comes to the attention of management that it is likely that a legal investigation will be performed, this policy requires any level of management to notify the Corporate Compliance Officer (CCO) immediately. The CCO will notify the President that destruction of any documents, in any media, will be immediately suspended and reviewed. Special care will be taken to ensure that documents in any media will not be destroyed if they will be useful for an investigation.

Documents existing in electronic form require special treatment. If there is a hard (paper) copy printed out and retained under the paper guidelines listed below, it is not necessary to retain the electronic copy. If there are only electronic records, the need to suspend destruction of them will be invoked if, and when, it comes to the attention of management that the records may become helpful to an important investigation. If this occurs, the I/T department will make every reasonable effort to obtain, retain, and protect any records that may become part of the investigation.

Voicemail is considered to be property of the organization and falls under similar rules for suspension of destruction. While it is up to the individual user to manage his or her voicemail by deleting unnecessary voicemail, if it becomes likely that voicemail has become necessary to an important investigation, the I/T department will be notified and directed to obtain and protect such voicemail.

All records of the Workforce Development Department, pertaining to participants, shall be held in archive for 7 years after the closure of the case. After this time, the information contained in the file shall be destroyed by means of shredding. In addition, any information containing a participant's name or information that could potentially identify a participant, that will not be filed, should be disposed of in like manner.



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**Confidential Records**

In the intake process, basic information will be recorded. This information is for professional use only and will be maintained at the Corporate Office. All consumer and employee records are considered confidential files and are maintained in secure areas.

You may have access to your own employee record for review. Before you can see your record you must submit a written request to the Director of Human Resources. If your request is approved, you will review your record; however your request to access your records may be denied if:

- Releasing information would cause harm to you, or
- If the information relates to another individual.

All medical records, if any, will be kept in a separate confidential file. Goodwill industries maintains this information in the strictest confidence and will not use or disclose medical information about an employee without the employee first having signed a legally complaint authorization form permitting such use or disclosure.

The following documents will be included in your Employee file:

1. Application for Employment
2. Release of information
3. I9 form Pay Roll Action form
4. Professional Development training, or general acknowledgements
5. State and Federal Taxes
6. Performance Appraisals
7. Disciplinary Action
8. Job Development material

You should notify your program facilitator if there is a change in:

1. Your address or phone number.
2. Your name or marital status.
3. Your number of dependents.
4. The person to notify in case of an accident or illness.
5. Name of family doctor, if you have one.