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| Policy Name: <p style="text-align: center;">RECORDS RETENTION, STORAGE, AND DESTRUCTION</p> | Policy Number: <p style="text-align: center;">0913</p> |
| Approved By: <p style="text-align: center;">Executive Team</p> | Effective Date: <p style="text-align: center;">SEPTEMBER 1, 1996</p> |
| Reason for Revision: <i>Click on item below and select item from list.</i> <p style="text-align: center;">CONTENT- Enter BELOW Reason for change Ex: Combined Policy ## and ##.</p> <p style="text-align: center;">Updated content to reflect current practice of records retention and provide more clarity</p> | Date Revised: <p style="text-align: center;">October 24, 2018</p> Next Date for Review: <p style="text-align: center;">October 1, 2021</p> |
| Section: <p style="text-align: center;">Section 09 - Administration</p> | Page No: <p style="text-align: center;">Page 1 of 5</p> |

Policy

Agapé Hospice is responsible for protecting the integrity of its records and is committed to supporting organizational accountability, transparency, and efficiency. All records created and received by Agapé Hospice are the property of Agapé Hospice. Upon changing position or leaving the employment or a contractual relationship with Agapé Hospice, the employee/contractor/student/volunteer must leave all records with Agapé Hospice.

OBJECTIVES

- To outline the requirements for the management of records created and maintained by, or on behalf of, Agapé Hospice.
- To ensure Agapé Hospice records are managed in accordance with applicable legislation and Agapé Hospice standards.

PRINCIPLES

- Records are valuable resources and assets created to meet operational, legislated, financial, and historical requirements.
- Access to Agapé Hospice records, regardless of format (including but not limited to, paper and electronic records) or locations, shall be authorized in accordance with applicable legislation and The Salvation Army/Agapé Hospice Policies/Procedures.

APPLICABILITY

This policy and procedure applies to all records(paper or electronic) created and maintained by, or on behalf of, Agapé Hospice staff, physicians, volunteers, students, and any other person acting on behalf of Agapé Hospice.



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POLICY ELEMENTS

1. Record Retention

Records shall be retained as noted in the procedure. This procedure is consistent with current, relevant legislation and requirements, and identifies the minimum retention periods.

2. Legal Holds

- 2.1** Destruction of records shall not occur if there is knowledge of:
 - a.** Claims, fatality inquiries, litigation or potential litigation relating to the records to be destroyed
 - b.** Receipt of FOIPP or HIA request relating to the records to be destroyed
 - c.** Investigations or audits
 - d.** Direction from The Salvation Army or legal counsel or senior executive
- 2.2** Records in legal hold shall be preserved by moving them to a secure location. Copies may be made for ongoing use.
- 2.3** Legal holds responsive to FOIPP/HIA records shall be removed six months from the date of closure of the request.

3. Destruction of Records

- 3.1** Destruction of records shall not occur in contravention of the standards identified in the procedure or in contravention of legal hold.

DEFINITIONS

Record: means documents, data, or information of any kind, in any medium (e.g., paper, digital, and audiovisual media) and in any format (e.g., documents, spread sheets, databases, emails, website pages, etc.) created, received, recorded, and maintained by Agapé Hospice as part of its service or business. This definition includes health records.

Transitory Record: means records in any media have no further value or usefulness beyond an immediate and minor transaction and are only required for a short time during and not usually after a transaction.



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Confidential Material: means any individually identifiable health information such as patient records and diagnostic and treatment records, as well as employment records, corporate records, budget reports, contracts, financial statements, all of which contain private information that needs to be protected from any access by unwanted parties or agencies.

Destruction: means the disposal of records of no further value by shredding with the objective of obliteration beyond any possible reconstruction.

Legal Hold: means a hold placed on the scheduled destruction of records due to unforeseeable or pending litigation, governmental investigation, audit, or special organizational requirements.

FOIPP: *Freedom of Information and Protection of Privacy Act* (FOIP Act). FOIP provides direction on how a public body can collect, use, and disclose personal information (which includes Personal Health Information). It also establishes rules that allow any person to access any records that are held by public bodies.

HIA: The *Health Information Act* is focused on protecting the privacy of individuals with respect to their health information and to protect the confidentiality of that information. HIA defines the rules on the collection, use, and disclosure of Personal Health Information and also enables health information to be shared and accessed by others in order to provide health services and to manage the health system.



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Procedure

RECORD RETENTION

Refer to the table below for the guidelines on retention of documents:

| | Description | Retention Period |
|---|---|-----------------------------------|
| Administration | Annual Balance Sheets | Permanently |
| | Annual Cash Statements | 10 fiscal years |
| | Audit Reports | 10 fiscal years |
| | Documents of Incorporation | Permanently |
| | General Correspondence | 3 fiscal years |
| | Receipt Registers | Permanently |
| | On Call Schedules | 10 years |
| Employee Resource Management | Classification Evaluation | 10 years |
| | Collective Agreements | Superseded or obsolete + 10 years |
| | Complaints or other Incident Reports | 10 years |
| | Employee Files | Termination + 5 years |
| | Labour Relations/Collective Bargaining | 10 years |
| | Staffing Rotations | Up to 2 years |
| | Union Grievances | 6 years after resolution |
| Facilities Maintenance & Engineering | Blue Prints | Permanently |
| | Elevator Inspection Reports | Permanently |
| | Information related to the utilities used such as gas, air conditioning, hydro-power, plumbing, heating, water and sewage. Records include historical data on cost distribution, requirement reports, specifications relating to the installation and maintenance of utilities and inspections. | 30 years |
| | Operations Log Book | Permanently |
| Incident Reports | All incident reports including OH&S | Permanently |
| Information & Privacy | Information related to the monitoring, investigation and granting of formal requests for access to personal information or general information under the Health Information Act or FOIP Act. | 10 years |
| OH&S | Employee Health Records | Termination + 5 years |
| | OHS reports relating to incidents involving staff injury | Termination + 5 years |



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| | Joint Health and Safety Walkthrough Reports | Permanently |
| Pharmacy | Narcotic Control Records | 2 years |
| Resident Clinical Records | All Clinical Records | 10 years |
| Risk Management/ Legal | Contracts | Over \$75,000 - permanently. Less than \$75,000 - 10 years after contract ends. |
| | Independent Contractor Services, Consulting, Practicum Agreements | Termination date + 10 years |
| | Insurance Claims | Claim complete + 10 years |
| | Legal Opinions and Advice | Retain until superseded or obsolete |
| | Records related to Active Legal Claims | Litigation completed or abandoned + 10 years |
| | Records related to Potential Legal Claims | 10 years |
| | Strategic Plan | Superseded or obsolete + 5 years |
| | Information related to the Development of Content | 3 years |
| Staff Training | Information related to Training and Development of Staff | 5 years |
| Staff Training – attendance & scheduling | Information related to Training and Development for Staff | 5 years |