



Procedure: HR06.05 – Privacy of Personal Information

Policy: HR06

Effective Date: 02/19/24

Editions:

Privacy of Personal Information

ELCFV will maintain a personnel file on each employee. Personnel files of all employees are confidential. Access to these files will be restricted to the employee, the Executive and Chief Operating Officers, Supervisors, the Executive Committee, and the staff member(s) appointed to handle Human Resources duties. An employee may have access to view his/her personnel file, excluding employment reference information, medical records and investigation files. Any exceptions to this policy must be approved by the Chief Executive Officer. While complying with its governmental reporting and record keeping requirements, ELCFV strives to ensure that it handles all personal and job-related information about employees in a secure, confidential, and appropriate fashion in accordance with the following principles and procedures.

Employee personnel records are maintained by Human Resources. As required by law, records relating to medical issues and internal investigations are maintained in separate files. For purposes of this policy, a personnel file includes records related to performance and training as well as other records used for hiring, promotion and disciplinary decisions. The personnel file does not include any reference checks, medical records or investigation files. Additional information an employee wishes to have included in his/her file may be submitted to Human Resources.

Employees may review their file by submitting a written request to Human Resources. Upon receipt of the written request, Human Resources will schedule an appointment to view the file during normal office hours. Employees may request copies of documents in their personnel file in writing to Human Resources. It is the employee's responsibility to ensure that all information contained in their file is current. Any changes should be reported to Human Resources as soon as possible.

ELCFV treats employees' personal information as confidential and respects the need to protect each employee's privacy by enforcing secure information handling procedures for all personnel involved in gathering, retaining, using, or releasing personal information about ELCFV's employees. ELCFV collects and retains personal information only as needed to conduct business and administer employment and benefit programs.



A separate medical record file is maintained containing all medical information relating to an employee. In most cases, medical information about an employee is released only to the worker's designated physician in accordance with the employee's written request.

During new hire orientation, new employees will review their onboarding documents via the HR/Payroll system. This system contains all their personal information. It is the employee's responsibility to notify Human Resources of any changes in this information and enter these changes in the HR/Payroll system.

ELCFV must provide information and data from its personnel records and files to federal, state, and local government agencies in accordance with record keeping and reporting requirements imposed by such agencies, or where requested by subpoena. In instances where a government agency requests information beyond that which it normally requires, ELCFV will advise the employee of the request.