

SAMPLE of Unacceptable Policy & Procedures

Area:	Policy: 12 VAC 35-105-390	Page 1 of 2 pages
Title: Confidentiality and Security of Personnel Records	Issued:	Revised:

Policy:

Provider will keep all employees records confidential and secure.

Procedures:

New employees, contractors, volunteers and students to this provider will have personnel record.

1. Personnel records will be kept at the office.
2. Staff may access the personnel file only with permission because of confidentiality.
3. Provider will not use electronic record for personnel files.
4. Separate file will be kept for medical, background and registry checks and general personnel records.
5. Personnel record will contain all training documents.

This policy and procedures would be unacceptable because:

- *The policy statement needed additional information;*
- *The heading is incomplete;*
- *The procedures do not give clear steps as to how the provider will protect the confidentiality of the personnel records;*
- *The policy and procedures are not specific as to which office the records will be kept in; and*
- *There is no identification of who, how, when and why- for all staff having access to the employee records.*

UNACCEPTABLE