

**RICHMOND SPCA**  
**DOCUMENT RETENTION AND DESTRUCTION POLICY**

**1. Policy and Purposes**

This is the policy of the Richmond SPCA (the “organization”) with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (which may merely be referred to as “documents” in this Policy). Purposes of the Policy include (a) retention and maintenance of documents necessary for the proper functioning of the organization as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained; and (c) guidance for the Board of Directors, officers, staff and other constituencies with respect to their responsibilities concerning document retention and destruction. Notwithstanding the foregoing, the organization reserves the right to revise or revoke this Policy at any time.

**2. Administration** The organization’s CEO and CFO shall both serve as administrators (“Administrators”) in charge of the administration of this Policy. The Administrators’ responsibilities shall include supervising and coordinating the retention and destruction of documents pursuant to this Policy and particularly the Document Retention Schedule included below. The Administrators shall also be responsible for documenting the actions taken to maintain and/or destroy organization documents and retaining such documentation. The Administrators may modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised document categories as may be appropriate. The Administrators are also authorized to periodically review this Policy and Policy compliance with legal counsel and to report to the Board of Directors or Executive Committee as to compliance. The Administrators may appoint one or more assistants to assist in carrying out the Administrators’ responsibilities. The organization’s staff and Board shall act in accordance with this Policy and shall assist the Administrators, as requested, in implementing it. Depending upon the sensitivity of the documents involved, the organization, through the Administrators, may share this Policy with the vendors, service providers and volunteers, requesting their compliance. In particular instances, the Administrators may require that the contract with any such outsider specify the particular responsibilities of the outsider with respect to this Policy.

**3. Suspension of Document Destruction; Compliance.** The organization becomes subject to a duty to preserve (or halt the destruction of) documents once litigation, an audit or a government investigation is reasonably anticipated. Further, federal law may impose criminal liability upon whomever “knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States ... or in relation to or contemplation of any such matter or case.” If the Administrators become aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, they shall immediately order a halt to all document destruction under this Policy. The Administrators may thereafter amend or rescind the order after conferring with legal counsel. If any Board member or staff member becomes aware that litigation, a governmental audit or a government

investigation has been instituted, or is reasonably anticipated or contemplated, with respect to the organization, and they are not sure whether the Administrators are aware of it, they shall make the Administrators aware of it. Failure to comply with this Policy, including, particularly, disobeying any destruction halt order, could result in possible civil or criminal sanctions. In addition, for staff, it could lead to disciplinary action including possible termination.

**4. Electronic Documents; Document Integrity.** Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the Administrators shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the organization.

**5. Privacy.** It shall be the responsibility of the Administrators, after consultation with counsel, to determine how privacy laws will apply to the organization's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

**6. Emergency Planning.** Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the organization in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location. The Administrators shall develop reasonable procedures for document retention in the case of an emergency.

**7. Document Retention Schedule.**

<u>Document Type</u>	<u>Retention Period</u>
<b>Accounting and Finance</b>	
Accounts Payable	7 years
Accounts Receivable	7 years
Annual Financial Statements and Audit Reports	Permanent
Bank Statements, Reconciliations & Deposit Slips	7 years
Canceled Checks – routine	7 years
Canceled Checks – special, such as loan repayment	Permanent
Credit Card Receipts	3 years
Employee/Business Expense Reports/Documents	7 years
General Ledger	Permanent
Interim Financial Statements	7 years
<b>Contributions/Gifts/Grants</b>	
Donor Records	Permanent
Documents Evidencing Terms of Gifts	Permanent

Grant Records

7 yrs after end of grant period

**Corporate and Exemption**

Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Minute Books, including Board & Committee Minutes	Permanent
Annual Reports to Attorney General & Secretary of State	Permanent
Other Corporate Filings	Permanent
IRS Exemption Application (Form 1023 or 1024)	Permanent
IRS Exemption Determination Letter	Permanent
State Exemption Application (if applicable)	Permanent
State Exemption Determination Letter (if applicable)	Permanent
Licenses and Permits	Permanent
Employer Identification (EIN) Designation	Permanent

**Correspondence and Internal Memoranda**

Hard copy correspondence and internal memoranda relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate.

Hard copy correspondence and internal memoranda relating to routine matters with no lasting significance	Two years
--	-----------

Correspondence and internal memoranda important to the organization or having lasting significance	Permanent, subject to review
--	------------------------------

**Electronic Mail (E-mail) to or from the organization**

Electronic mail (e-mails) relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate, but may be retained in hard copy form with the document to which they relate.

E-mails considered important to the organization or of lasting significance should be printed and stored in a central repository .	Permanent, subject to review
--	------------------------------

E-mails not included in either of the above categories	6 months
--	----------

**Electronically Stored Documents**

Electronically stored documents (e.g., in pdf, text or other electronic format) comprising or relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document which they comprise or to which they relate, but may be retained in hard copy form (unless the electronic aspect is of significance).

Electronically stored documents considered important to the organization or of lasting significance should be printed and stored in a central repository (unless

the electronic aspect is of significance).

Permanent, subject to review

Electronically stored documents not included in either of the above categories

Six Months

**Employment, Personnel and Pension**

Personnel Records

10 yrs after employment ends

Employee contracts

10 yrs after termination

Retirement and pension records

Permanent

**Insurance**

Property, D&O, Workers' Compensation and

General Liability Insurance Policies

Permanent

Insurance Claims Records

Permanent

**Legal and Contracts**

Contracts, related correspondence and other supporting documentation

10 yrs after termination

Legal correspondence

Permanent

**Management and Miscellaneous**

Strategic Plans

7 years after expiration

Disaster Recovery Plan

7 years after replacement

Policies and Procedures Manual

Current version with revisions