### Rotary Club of Torrington Winsted Areas

## **Record Retention Policy**

March 12, 2015

### **Purpose**

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by the Rotary Club of Torrington Winsted Areas in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under a legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate the Rotary Club of Torrington Winsted Areas operations by promoting efficiency and freeing up valuable storage space.

#### **Document Retention**

The Rotary Club of Torrington Winsted Areas follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

#### Corporate Records

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
Bylaws	Permanent
Construction Documents	Permanent
Fixed Asset Records	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exemption Letter	Permanent
Contracts and Leases (after expiration)	7 years
Correspondence (general)	3 years
Correspondence (legal and important matters)	Permanent

## Accounting and Corporate Tax Records

Permanent
Permanent
Permanent
Permanent
Permanent
7 years
7 years
7 years
Permanent
7 years
5 years
3 years
3 years
3 years

# Bank Records Checks 7 years Permanent Checks related to important payments Bank Deposit Slips 7 years Bank Statements and Reconciliation 7 years **Electronic Fund Transfer Documents** 7 years Payroll and Employment Tax Records None **Employee Records** None **Donor and Grant Records** Donor Records and Acknowledgment Letters 7 years **Grant Applications and Contracts** 7 years after completion Legal, Insurance, and Safety Records **Appraisals** Permanent **Environmental Studies** Permanent **Insurance Policies** Permanent Real Estate Documents Permanent Stock and Bond Records Permanent **OSHA** Documents 5 years **Electronic Documents and Records** Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis. **Emergency Planning** The Rotary Club of Torrington Winsted Areas records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the Rotary Club of Torrington Winsted Areas operating in an emergency will be duplicated or backed up at least every week and maintained off-site. **Document Destruction** The Rotary Club of Torrington Winsted Areas \_\_\_ \_\_(individual) is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

## Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Rotary Club of Torrington Winsted Areas and its employees and possible disciplinary action against responsible individuals. The \_\_\_\_\_ committee will periodically review these procedures with legal counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a

lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.