

## NEW ENGLAND SWIMMING, INC RECORD RETENTION POLICY

New England Swimming, Inc. takes seriously its obligations to preserve information relating to finances, litigation, audits, and investigations.

The information listed in the retention schedule below is intended as a guideline and may not contain all the records the Organization may be required to keep in the future. Questions regarding the retention of documents not listed in this chart should be directed to the Vice Chair of Finance.

From time to time, the General Chair may issue a notice, known as a “legal hold,” suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the General Chair.

<b>File Category</b>	<b>Item</b>	<b>Retention Period</b>
<b>Corporate Records</b>	Bylaws and Articles of Incorporation	Permanent
	Corporate resolutions	Permanent
	Board and committee meeting agendas and minutes	Permanent
	Conflict-of-interest disclosure forms	4 years
<b>Finance and Administration</b>	Financial statements	7 years
	Auditor management letters	7 years
	Payroll records	7 years
	Check register and checks	7 years
	Bank deposits and statements	7 years
	Chart of accounts	7 years
	General ledgers and journals (includes bank reconciliations)	7 years
	Investment performance reports	7 years
	Equipment files and maintenance records	7 years after disposition
	Contracts and agreements	7 years after all obligations end
Correspondence — general	3 years	
<b>Insurance Records</b>	Policies — occurrence type	Permanent
	Policies — claims-made type	Permanent
	Accident reports	7 years
	Safety (OSHA) reports	7 years
	Claims (after settlement)	7 years

	Group disability records	7 years after end of benefits	
<b>Real Estate</b>	Deeds	Permanent	
	Leases (expired)	7 years after all obligations end	
	Mortgages, security agreements	7 years after all obligations end	
<b>Tax</b>	IRS exemption determination and related correspondence	Permanent	
	IRS Form 990s	7 years	
	Charitable Organizations Registration Statements (filed with Massachusetts Attorney General)	7 years	
<b>Human Resources</b>	Employee personnel files	Permanent	
	Retirement plan benefits (plan descriptions, plan documents)	Permanent	
	Employee handbooks	Permanent	
	Workers comp claims (after settlement)	7 years	
	Employee orientation and training materials	7 years after use ends	
	Employment applications	3 years	
	Withholding tax statements	7 years	
Timecards	3 years		
<b>Technology</b>	Software licenses and support agreements	7 years after all obligations end	
<b>LSC Specific</b>	Proof of age documents	No more than 30 days. Paper copies stored in locked filing cabinet until destroyed by shredding. Emailed copies are permanently deleted.	
	Club applications	3 years	
	Transfer applications	3 years	
	Member applications and certifications	3 years	
	Financial reports for meet hosting	7 years	
	Reimbursement request for travel and member expenses approved by policy	7 years	
	Club Grant applications	7 years	
	Athlete records	Permanent	
	Scholarship applications	1 year	
	LSC hosted meet results	1 year	

## **1. Electronic Documents and Records.**

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files 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.

## **2. Emergency Planning.**

The Organization's records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the Organization operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

## **3. Document Destruction.**

The Office Manager 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.

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.

## **4. Compliance.**

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Organization and its employees and possible disciplinary action against responsible individuals. The General Chair and Governance Chair 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.