



DOCUMENT RETENTION AND RECORDS MANAGEMENT POLICY

I. Introduction

The Emmanuel Ivorgba Center (TEIC) recognizes the critical importance of effective document retention and records management for operational efficiency, legal compliance, accountability, and the preservation of institutional knowledge. This policy establishes clear guidelines for the creation, organization, retention, and disposal of TEIC's records, ensuring that information is managed systematically and securely throughout its lifecycle.

II. Purpose and Objectives

This policy aims to:

- **Ensure Legal and Regulatory Compliance:** Meet all applicable federal, state, and local laws and regulations regarding record keeping, including those related to tax, employment, and charitable giving.
- **Support Operational Efficiency:** Enable easy retrieval of necessary information for day-to-day operations, decision-making, and program delivery.
- **Facilitate Audits and Investigations:** Provide access to accurate and complete records for internal and external audits, donor compliance, and any legal inquiries.
- **Preserve Institutional Knowledge:** Safeguard valuable information and historical data that contribute to TEIC's institutional memory and learning.
- **Protect TEIC from Liability:** Minimize legal and financial risks by retaining relevant records and properly disposing of obsolete ones.
- **Promote Data Security and Confidentiality:** Ensure that sensitive information is protected from unauthorized access, loss, or damage.
- **Enhance Transparency and Accountability:** Demonstrate responsible stewardship of resources and information to donors, beneficiaries, and stakeholders.

III. Scope

This policy applies to all records, regardless of their format (e.g., paper, electronic, digital, audio-visual) or location, created, received, or maintained by The Emmanuel Ivorgba Center, its employees, volunteers, contractors, and board members in the course of their duties. This includes, but is not limited to:

- **Financial Records:** Invoices, receipts, bank statements, accounting ledgers, grant budgets, audit reports, tax returns.
- **Programmatic Records:** Program plans, proposals, reports, participant data, evaluation reports, outreach materials.
- **Human Resources Records:** Employment applications, personnel files, payroll records, benefits information, training records, volunteer agreements.
- **Governance Records:** Board meeting minutes, bylaws, policies and procedures, conflict of interest statements, annual reports.
- **Legal Records:** Contracts, agreements, leases, legal correspondence, permits, licenses.
- **Communications Records:** Correspondence (internal and external), emails, publications, website content.
- **Donor and Fundraising Records:** Donation receipts, donor lists, fundraising campaign materials, donor acknowledgments.

IV. Definitions

- **Record:** Any document, file, or piece of information, regardless of format, that is created, received, or maintained by EIC in the conduct of its business.
- **Active Records:** Records that are frequently accessed and used for ongoing operational needs.
- **Inactive Records:** Records that are no longer actively used but must be retained for a specified period due to legal, regulatory, or historical reasons.
- **Record Retention Schedule:** A document that specifies how long different types of records should be kept before they are eligible for disposal.
- **Vital Records:** Records essential for the continued operation of EIC in the event of a disaster.
- **Confidential Records:** Records containing sensitive personal, financial, or proprietary information that require special protection.

V. Record Management Procedures

A. Creation and Organization of Records:

1. **Standardized Naming Conventions:** Implement consistent naming conventions for electronic files to facilitate organization and retrieval.
2. **Centralized Storage:** Designate primary locations for storing both physical and electronic records. Electronic records should be stored on EIC-approved secure servers or cloud storage solutions.
3. **Clear Filing Systems:** Establish logical and intuitive filing systems for both physical and electronic records.
4. **Document Tagging/Metadata:** Utilize metadata and tagging for electronic records to enhance searchability and organization.

B. Record Retention Schedule:

1. **Development:** TEIC will develop and maintain a comprehensive Record Retention Schedule that outlines the minimum retention periods for various categories of records. This schedule will be reviewed and updated annually or as needed.
2. **Basis for Retention Periods:** Retention periods will be determined based on:
 - Legal and regulatory requirements (federal, state, local).
 - Audit requirements.
 - TEIC's operational needs.
 - Historical or archival value.
 - Contractual obligations.
3. **Review and Approval:** The Record Retention Schedule will be developed in consultation with legal counsel (if applicable) and approved by the Executive Director and the Board of Trustees.

C. Storage and Security:

1. **Physical Records:**
 - Store physical records in secure, climate-controlled environments to protect them from damage, theft, and unauthorized access.
 - Utilize locked cabinets or secure storage rooms for sensitive or confidential documents.
2. **Electronic Records:**
 - Store electronic records on EIC-approved, secure servers or cloud-based systems with appropriate access controls, firewalls, and regular backups.
 - Implement strong password policies and multi-factor authentication where applicable.
 - Ensure regular data backups are performed and stored securely offsite.
3. **Confidentiality:** Access to confidential records will be restricted to authorized personnel on a need-to-know basis.

D. Access to Records:

1. **Authorized Access:** Access to records will be granted based on job function and the need to perform duties.
2. **Retrieval Process:** A clear process for requesting and retrieving both active and inactive records will be established.
3. **Data Privacy:** All staff will be trained on data privacy principles and the importance of protecting sensitive information.

E. Record Disposal:

1. **Destruction of Records:** Once records have reached the end of their designated retention period and are no longer needed for legal, regulatory, or operational purposes, they will be disposed of securely.
2. **Secure Disposal Methods:**
 - **Physical Records:** Shredding using cross-cut shredders or engaging a professional document destruction service.
 - **Electronic Records:** Secure deletion methods that render data irrecoverable, or engaging a professional electronic media destruction service.
3. **Disposal Log:** Maintain a log of records that have been disposed of, including the date of destruction, description of records, and the authority for disposal.
4. **Legal Holds:** No records subject to a legal hold or litigation discovery request will be destroyed until the legal hold is formally released.

VI. Vital Records Management

1. **Identification:** EIC will identify its vital records, which are essential for resuming operations in the event of a disaster (e.g., incorporation documents, key financial records, donor databases).
2. **Protection:** Vital records will be protected through redundant backups, offsite storage, and potentially duplication on durable media.
3. **Recovery Plan:** A plan for accessing and restoring vital records in the event of a disaster will be developed and regularly tested.

VII. Roles and Responsibilities

- **Board of Directors:** Approves the Document Retention and Records Management Policy and the Record Retention Schedule. Provides oversight of the policy's implementation.
- **Executive Director:** Is ultimately responsible for ensuring the implementation and enforcement of this policy. Approves the Record Retention Schedule.
- **Operations Manager / Administrative Staff:** Responsible for the day-to-day implementation of the policy, including organizing, storing, and managing records. Maintains the Record Retention Schedule and coordinates record disposal.
- **All Staff and Volunteers:** Responsible for understanding and adhering to this policy in their daily work. This includes proper creation, organization, storage, and timely disposal of records under their purview.
- **IT Department/Consultant (if applicable):** Responsible for the secure management, backup, and recovery of electronic records.

VIII. Training and Awareness

All TEIC staff and volunteers will receive training on this policy upon hiring and periodically thereafter. This training will cover the importance of record management, specific procedures, and their individual responsibilities.

IX. Policy Review and Revision

This policy will be reviewed annually by the Executive Director and the Board of Directors, or more frequently as required by changes in legislation, operational needs, or organizational structure. Revisions will be documented and communicated to all staff.

X. Approval and Effective Date

Approved by the Board of Trustees of The Emmanuel Ivorgba Center on: January 5, 2024

This policy is effective as of: January 5, 2024
