

# GLASGOW CALEDONIAN NEW YORK COLLEGE

## RECORD RETENTION POLICY

### 1. Purpose

To outline the policy for the retention and disposal of information and records held in any format by GCNYC (“the College”).

### 2. Policy Statement

2.1 Certain organizational documents and electronic files are required by law to be kept for a minimum length of time because of their importance as operational, legal or financial records. A record may include items such as a memorandum, a contract, an e-mail, or a report, as well as other less obvious items, such as a computerized desk calendar, an appointment book, or an expense record. Records may be in any medium, including print, electronic, and audio/visual media.

2.2 The Records Retention Policy sets out the timescales for retaining records and the disposal action which may be destruction or long term preservation (archiving). Below are tables of Permanent and Non-Permanent Records with Retention Periods. Exceptions to these rules and terms for retention may be granted only by the President & CEO or such person as nominated by the President & CEO for this purpose.

2.3 Procedures will be put in place to review records to identify those which may be destroyed in line with the Records Retention Policy. This will ensure that information is not retained for longer than required to meet business needs and legal and regulatory requirements.

2.4 Records may be designated as being of enduring or long term value and suitable for permanent retention and maintenance in the College Archives. These will be identified in the Records Retention Policy.

2.5 Procedures will be implemented to prevent the premature destruction of records that need to be retained to satisfy legal, financial and other requirements of public administration.

2.6 Staff will ensure that where certain records are relevant to litigation or potential litigation, that is a dispute that could result in litigation, then those records will be preserved until the organization’s attorneys determine the records are no longer needed. This exception supersedes any established destruction schedule for those records.

2.7 The record owner will approve disposal and a record will be kept of the authorising officer and date of authorisation.

2.8 Information and records held in any format will be destroyed in a secure and permanent manner which renders the recovery or recreation of the informational content impossible.

2.9 A Destruction Certificate will be received and retained to audit off-site destruction.

### **Section 3 – Retention Schedule**

#### **I. Permanent Records (Items that should not be destroyed)**

##### *Accounting and Finance:*

Annual audited financial statements  
Attorney contingent liability letters  
General Ledgers

##### *Tax records:*

IRS Form 990  
IRS Determination Letter  
IRS or other government audit records  
IRS rulings  
Tax returns – income, franchise,

property

##### *Corporate records:*

Board policies  
Bylaws  
Certificate/Articles of  
Incorporation/Charter  
Corporate seal  
Minutes of board and committee  
meetings  
Registrations, licenses, and permits –  
State, local, and municipal

##### *Insurance records:*

Certificates issued to the organization  
Claims files (e.g., correspondence,  
medical records, injury documentation)  
Group insurance plans (retirees)  
Insurance policies

##### *Legal files:*

Court Orders, Judgments, Releases,

Settlements

##### *Personnel records:*

Employee handbook  
Core employee records: staff name, post  
held and dates.

##### *Property records:*

Correspondence, property deeds,  
assessments, licenses, rights of way  
Intellectual property records  
Original purchase/sale/lease  
agreements, and any related  
regulatory/court approvals  
Property insurance policies

##### *Contribution records:*

Records of contributions  
Documents evidencing terms,  
conditions or restrictions on gifts

##### *Student and Program records*

Program documentation

Graduation brochures

Honorary awards listing

Program approval reports

#### **II. Non-Permanent Records**

##### **Section Topics**

1. Accounting and Finance
2. Tax Records
3. Corporate Records
4. Contracts
5. Grant Records

6. Insurance Records
7. Legal Files
8. Personnel Records
9. Payroll Records
10. Property Records
11. Contribution Records
12. Correspondence and Internal Memoranda
13. Electronic Documents
14. Student Records
15. Program Records
16. Research Records
17. Library Records

## 1. Accounting and Finance

<b>Record Type</b>	<b>Retention Period</b>
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual audited financial statements	Permanent
Attorney contingent liability letters	Permanent
Bank Statements, cancelled checks, deposit receipts	7 years
Budgets (annual)	2 years
Cash journals, check registers	7 years
Credit card statements	2 years
Employee expense reports	7 years
General Ledgers	Permanent
Investment records	7 years after sale of investment
Invoices	7 years
Loans/Notes Payable ledgers and schedules	7 years
Petty cash records	7 years
Purchase orders	7 years

## 2. Tax Records

<b>Record Type</b>	<b>Retention Period</b>
Excise tax records	7 years
Federal and state annual information returns (e.g., Form 990)	Permanent
IRS Determination Letter	Permanent
IRS or other government audit records	Permanent
IRS rulings	Permanent
Payroll tax records	7 years
Sales/use tax records	7 years

Tax bills, receipts, statements	7 years
Tax returns – income, franchise, property	Permanent
Tax workpaper packages	7 years after completion of audit

### 3. Corporate Records

Record Type	Retention Period
Board policies	Permanent
Bylaws	Permanent
Certificate/Articles of Incorporation/Charter	Permanent
Corporate seal	Permanent
Minutes of board and committee meetings	Permanent
Registrations, licenses, and permits - state, local, and municipal (e.g., foreign “doing business as” registrations, d/b/as, charitable state registrations)	Permanent

### 4. Contracts

Record Type	Retention Period
Contracts and related correspondence (including any proposal that resulted in the contract and all other supporting documentation)	17 years after expiration, termination, and/or non-renewal
Loan and related Security Agreement records	Duration of the term of the loan, plus the minimum statute of limitations period after the loan is fully discharged

### 5. Grant Records

Record Type	Retention Period
All evidence of returned funds	7 years after end of grant period
All pertinent formal correspondence, including opinion letters of counsel	7 years after end of grant period
All requested IRS/grantee correspondence including grantee’s IRS determination letters	7 years after end of grant period
Final grantee reports (financial and narrative)	7 years after end of grant period
Grant agreement	7 years after end of grant period
Original grant proposal	7 years after end of grant period

## 6. Insurance Records

<b>Record Type</b>	<b>Retention Period</b>
Annual loss summaries	10 years
Audits and adjustments	3 years after final adjustments
Certificates issued to the organization	Permanent
Claims files (e.g., correspondence, medical records, injury documentation, etc.)	Permanent
Group insurance plans (active employees)	Until plan is amended or terminated
Group insurance plans (retirees)	Permanent or until 6 years after death of last eligible participant
Incident and Accident Reports	4 years after report date
Insurance policies	Permanent
Releases and settlements	25 years
Workers' compensation claims and insurance policies	18 years
Health and Safety awareness records (eg Risk Assessments, fire warden training)	10 years

## 7. Legal Files

<b>Record Type</b>	<b>Retention Period</b>
Court Orders	Permanent
Judgments	Permanent
Legal memoranda and opinions	7 years after close of the matter
Litigation files	5 years after case is closed and expiration of time for appeals
Lobbying records – state and federal lobbying expenses, reports, and supporting records	10 years
Releases	Permanent
Settlements	Permanent
Retention Schedule	10 years after superseded

## 8. Personnel Records

<b>Record Type</b>	<b>Retention Period</b>
Americans with Disabilities Act (ADA) requests or claims	2 years; if charge filed, until resolved
Awards/Bonuses/Incentives	7 years
EEO-1, EEO-2 Employer Information Reports to the EEOC	2 years after superseded or filing (whichever is longer)
Employee earnings records	Separation + 7 years

Employee handbook	Permanent
Employee medical records in general  <b>*Note that medical records must be stored separately and treated as confidential, except in the case of providing information to supervisors concerning accommodations.</b>	Separation + 30 years  Exception is for employees who worked for less than one year as long as they are given records upon termination.
Logs and summaries of occupational injuries or illnesses	5 years
Any ADA requests or claims	2 years; if charge filed, until resolved
Employee personnel records (hired): including resume/application form, Form I-9, individual attendance records, job or status change records, compensation information, performance evaluations, disciplinary matters, termination papers, leave/comp time/FMLA, employee benefit plan enrollment, hiring/termination dates, engagement and discharge correspondence, worker's compensation claims, withholding information, garnishments, test results, training and qualification records  <b>*Note that payroll records, including dates of leave, records of any disputes must be stored separately and treated as confidential.</b>	Separation + 6 years
Employment contracts (individual)	Separation + 7 years
Employment records (hired): correspondence with employment agencies and advertisements for job openings	Date of hiring decision + 3 years
Employment records (non-hired applicants): applications and resumes, results of post-offer, pre-employment physicals, results of background investigations if any, related correspondence	2 years (4 years if file contains any correspondence that might be construed as an offer)
Job descriptions	3 years after superseded
Occupational injuries or illnesses - logs and summaries	5 years
Sexual harassment complaints, investigations, and findings	No-Cause Findings, 3 years from determination Cause Findings, Permanent

## 9. Payroll Records

<b>Record Type</b>	<b>Retention Period</b>
Employee deduction authorizations	Termination + 4 years
Garnishments, assignments, attachments	Termination + 7 years
Payroll deductions	Termination + 7 years
Payroll registers (gross and net)	7 years
Time cards/sheets	2 years
Unclaimed wage records	6 years
W-2 and W-4 forms	Termination + 7 years

## 10. Property Records

<b>Record Type</b>	<b>Retention Period</b>
Correspondence, property deeds, assessments, licenses, rights of way	Permanent
Intellectual property records (trademarks and service marks, copyrights, patents)	Permanent
Original purchase/sale/lease agreements, and any related regulatory/court approvals	Permanent
Property insurance policies	Permanent

## 11. Contribution Records

<b>Record Type</b>	<b>Retention Period</b>
Records of contributions	Permanent
Documents evidencing terms, conditions or restrictions on gifts	Permanent
Fund raising and donations	6 years

## 12. Correspondence and Internal Memoranda

General Principle: Correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For example, a letter pertaining to a particular contract would be retained as long as the contract (see Contracts section). Records that support a particular project should be kept with the project and take on the retention period of that particular project file.

Correspondence and memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:

1. Routine matters having no significant, lasting consequences: Discard within two years. Examples include:
  - a. Routine letters that require no acknowledgment or follow-up, e.g., notes of appreciation, letters of transmittal, plans for meetings
  - b. Form letters that require no follow-up
  - c. Letters of general inquiry and replies that complete a cycle of correspondence
  - d. Letters of complaints or requesting specific action that have no value after changes are made or action is taken (e.g., name/address change)
2. Documents pertaining to non-routine matters or having significant lasting consequences should be retained permanently, unless otherwise determined by the Executive Director, President or legal counsel.

Copies of interoffice correspondence should be maintained in the originating department file only.

### **13. Electronic Documents**

- a. **Electronic Mail:** Not all email needs to be retained, depending on the subject matter.
  - i. All e-mail—from internal or external sources—is to be deleted after 12 months.
  - ii. Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
  - iii. The organization will archive e-mail for six months after the staff has deleted it, after which time the e-mail will be permanently deleted.
  - iv. All business-related email should be downloaded to a user directory on the server.
  - v. Staff will only store or transfer organization-related e-mail in accordance with the College's Information Classification Policy.
  - vi. Staff will only send confidential/proprietary information in accordance with the College's Information Classification Policy.
  - vii. Any e-mail staff deems vital to the performance of their job should be stored on the network drives rather than employee personal drives.
- b. **Electronic Documents:** (e.g., PDF, Word, Excel, image files) The retention period for electronic documents is based on the subject matter and its respective category under this Policy.
- c. **Web Page Files: Internet Cookies**



- i. The Web browsers on all workstations should be scheduled to delete Internet cookies once per month.

In certain cases, a document will be maintained in both paper and electronic form. In such cases, the official document will be the electronic document.

#### 14. Student Records

<b>Record Type</b>	<b>Retention Period</b>
Admissions Successful	6 years
Admissions Unsuccessful	1 year
Exam results	80 years
Graduation brochures	Permanent
Graduation registration	1 year
Attendance records	6 years from end of relationship
Absence	6 years from end of relationship
Student file	6 years from end of relationship
Exam papers (ie question papers)	6 years
Exam scripts (ie student exam papers)	2 years
Courseworks (ie assignments, student papers)	2 years
Plagiarism records	5 years
Appeals Records	5 years
Disciplinary Committee records	5 years
Visa and immigration records	6 years from end of relationship
Disclosure/Police check (certificates, details)	6 months
Disclosure/Police checks (summary details)	6 years from end of relationship
Alumni records	Permanent
Student returns (eg to statutory bodies)	5 years
Student funding (eg hardship)	6 years from end of relationship
FERPA forms	6 years from end of relationship
Honorary awards record	Permanent

#### 15. Program Records

<b>Record Type</b>	<b>Retention Period</b>
Approval and review reports	Permanent
Program documentation/specification	Permanent
External examiner approvals ??	5 years from termination
External examiner reports (overall) ??	Permanent
Annual Monitoring reports	5 years

Module feedback forms	5 years
Professional/Statutory Body reports	Permanent
Student Staff Consultative Group minutes	5 years
Program Board minutes	5 years
Program business case	Permanently (within Committee papers)

## 17. Library Records

Record Type	Retention Period
Library user records	1 year from end of relationship

## 4. Training & Awareness

All staff will be made aware of this Policy as part of the induction process. The Policy will be published on the GCNYC website and any amendments or revisions will be noted within the document control section.

## 5. Policy Review

A review will be undertaken on an annual basis with content being updated as appropriate. It may be altered at any time if amendments are deemed necessary.