

Climbing Wall Association

Records Retention and Destruction Policy

It is the CWA's intent to maintain complete and accurate records of its business. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual reasons, tax purposes, legal or regulatory requirements or for other purposes as may be set forth herein. Records that are no longer required, or have satisfied their required periods of retention, may be destroyed.

1. **Scope.** This Document Retention and Destruction Policy of the Climbing Wall Association (CWA) identifies the record retention responsibilities of staff, volunteers, members of the Board of Directors, and outsiders for maintaining and documenting the storage and destruction of the Organization's documents and records.
2. **Responsibility for Administration.** The CEO (or his/her staff designee) shall be responsible for administering this policy. As part of this role, the CEO (or his/her staff designee), in consultation with legal counsel, shall ensure that CWA documents and records retained by officers, directors, employees, volunteers, or agents are stored or destroyed in a manner consistent with this policy.
3. **Documentation Retention Rules.** The Organization's staff, volunteers, members of the Board of Directors and outsiders (i.e., independent contractors via agreements with them) are required to honor these rules: (a) paper or electronic documents indicated under the terms for retention below will be transferred and maintained by the CEO or the CEO's designee; (b) all other electronic documents will be retained for at least five years; (c) all other paper documents will be retained for at least three years; (d) electronic documents will be deleted from all individual computers, databases and networks after five years.
4. **Document Destruction Methods.** Destruction of sensitive, financial, or personnel-related paper documents will be accomplished by shredding. Destruction of electronic data will be accomplished by data wiping or any software method that overwrites data on the physical media at least once. CWA owned storage media must be wiped before being discarded. **Note:** basic file deletion will not meet the requirements of this policy at this time.
5. **Terms for Retention.**
 - a. Retain permanently:
 - i. Governance records – Articles of Incorporation, Bylaws, approved board policy documents, committee charters, board meeting minutes, committee meeting minutes.
 - ii. Tax records – Filed state and federal tax returns/reports and supporting records, tax exemption determination letter and related correspondence, files related to tax audits.
 - iii. Intellectual property records – Copyright and trademark registrations and samples of protected works.
 - iv. Financial records – Audited financial statements, attorney contingent liability letters.
 - v. Pension, retirement and benefit records – Pension/Retirement plan participant/beneficiary records, actuarial reports, related correspondence with government agencies, and supporting records.
 - vi. Construction plans and documents.

- vii. Owned real estate records.
 - b. Retain for thirty years:
 - i. Certain Employee Medical Records. Records related to medical exams involving workplace toxic substance and blood-borne pathogen exposure must be retained for thirty years after termination of employment (OSHA).
 - c. Retain for seven years:
 - i. Government relations records – State and federal lobbying and political contribution reports and supporting records.
 - ii. Donor and Grant Records.
 - d. Retain for three years:
 - i. Employee/employment records – Employee names, addresses, social security numbers, dates of birth, INS Form I-9, resume/application materials, job descriptions, dates of hire and termination/separation, evaluations, compensation information, promotions, transfers, disciplinary matters, time/payroll records, leave/comp time/FMLA, engagement and discharge correspondence, documentation of basis for independent contractor status (retain for all current employees and independent contractors and for three years after departure of each individual).
 - ii. Lease, insurance, and contract/license records – Software license agreements, vendor, hotel, and service agreements, independent contractor agreements, employment agreements, consultant agreements, and all other agreements (retain during the term of the agreement and for three years after the termination, expiration and non-renewal of each agreement).
 - e. Retain for one year:
 - i. All other electronic records, documents and files – Correspondence files, past budgets, publications, employee manuals/policies and procedures, survey information.
- 6. **Limitations on Document Destruction.** No paper or electronic documents will be destroyed or deleted if pertinent to any anticipated or ongoing internal investigation, government investigation or proceeding or private litigation. No officer, director, employee, volunteer, or agent of CWA shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter of the Board of Directors or within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case. This policy covers all records and documents of CWA.
- 7. **Exceptions.** Exceptions to these rules and terms for retention may be granted only by the Organization’s CEO or board of directors, in consultation with legal counsel.
- 8. **Alteration or Termination.** CWA reserves the right to amend, alter and terminate this policy at any time and for any reason.