



Record Retention Policy

Approved by Board of Trustees 3/11/2021

1. In this policy, the term “record” includes, without limitation, any document, file, correspondence, message, report, contract or other agreement, database entry, writing, annotation, image, audio or video recording, design, plan, budget, financial statement, transaction history, invoice, or other record of information of any kind, in any form, print or electronic.
2. It is the policy of Chesapeake Shakespeare Company (“CSC”) to retain or, when specifically required, to destroy records under its control in accordance with the following (in order of precedence):
 - a. Federal, state, and local laws, regulations, and administrative orders; official guidance of government agencies; judicial orders and other valid legal process;
 - b. Contractual obligations, including but not limited to those in grant and other funding agreements; and
 - c. Generally accepted accounting practices.
3. Subject to the provisions of paragraph 2 above, records shall be retained while their retention serves a continuing or anticipated future business purpose of CSC. Thereafter, records should be destroyed within a reasonable period of time whenever their destruction will promote economical storage of and/or efficient access to remaining records, or will otherwise advance CSC business purposes.
4. Apart from the provisions of paragraph 2 above, which shall be strictly observed, the provisions of this policy should be understood as basic, general guidelines, to be supplemented where appropriate by managerial discretion and common sense.
5. With respect to any record, primary responsibility for compliance with this policy lies with the head of the department within which the record was created, or to which the record was transmitted for final processing or disposition.
6. Records in physical form shall be organized and maintained in suitable storage fixtures (e.g., desk drawers, filing cabinets, box archives). Such fixtures shall be secured in a manner appropriate to the sensitivity of the records stored in them. For most ordinary business records, the area security of CSC office premises will be considered sufficient.
7. In general, physical records shall be maintained on CSC premises; however, suitable off-site archival storage may be authorized by the Managing Director.
8. Records in electronic form shall be maintained on online (“cloud”) platforms licensed and controlled by CSC, currently including Microsoft Office 365 (Exchange, SharePoint, OneDrive, etc.), Salesforce, QuickBooks Online, and others, or on local CSC network servers or network-attached storage devices with redundant storage media. Electronic records shall not be maintained on individual computer drives or portable storage media other than for temporary working use. Electronic records shall not under any circumstances be maintained on online platforms not licensed and controlled by CSC (e.g., personal Dropbox accounts).

9. Electronic records (including email messages) relating to important internal business decisions and/or to agreements with outside parties shall be printed and maintained in physical as well as electronic form.
10. Subject to the provisions of paragraph 2(a) above, records described in the Payment Card Industry Data Security Standard (https://www.pcisecuritystandards.org/document_library) shall be retained, maintained, and destroyed in accordance with that standard.
11. The destruction of previously retained records under this policy shall be logged in writing and approved beforehand by the relevant department head and the Managing Director. Such record destruction logs shall be retained permanently.
12. Physical records shall be destroyed by in-house mechanical shredding, commercial document destruction service, or other methods meeting accepted business standards. Electronic records maintained online shall be destroyed by use of online platform functions for permanent deletion. Electronic records maintained on local servers or storage devices shall be destroyed by use of secure file deletion or drive erasure software or by the physical destruction of storage media.
13. In response to notification of potential or actual litigation, or at their own discretion and for any reason, the Managing Director or the President of the Board of Trustees may issue a “legal hold” suspending the destruction of designated classes of record notwithstanding any other provisions of this policy. All CSC employees, trustees, officers, contractors, volunteers, and other affiliates (collectively, “CSC affiliates”) shall strictly observe any such legal hold until it is formally terminated. In addition, information systems staff shall promptly take appropriate steps to implement any legal hold using online platform functions.

All CSC affiliates are advised that the consequences of failing to retain records subject to a legal hold can be severe, including possible criminal and civil sanctions against CSC and affiliated individuals, as well as possible disciplinary action against responsible individuals up to and including termination of employment.

14. Any CSC affiliate who becomes aware of any potential or actual litigation, external audit, investigation, or similar proceeding involving CSC shall notify the Managing Director of such action or proceeding immediately.
15. Subject to all provisions above, records shall be retained for at least the periods listed below:

Record Type	Minimum Retention Period
Accounts payable ledgers and schedules	7 years
Accounts receivable ledgers and schedules	7 years
Audit reports	Permanent
Bank reconciliations	2 years
Bank statements	3 years
Checks (routine)	3 years
Checks (important payments and purchases)	Permanent
Contracts, deeds, bills of sale, mortgages, notes, leases, etc. (personal property)	7 years after conclusion/expiration/termination

Contracts, deeds, bills of sale, mortgages, notes, leases, etc. (real property)	Permanent
Contribution records, including terms/conditions of gift	Permanent
Correspondence (general)	2 years
Correspondence (legal and other important matters)	Permanent
Credit card receipts	3 years
Depreciation schedules	Permanent
Duplicate deposit slips	2 years
Employment applications	3 years
Expense analyses/expense distribution schedules	7 years
Financial statements (year-end)	Permanent
General journal entries	Permanent
Government filings	Permanent
Grant applications, agreements, and reports	7 years after end of grant period
Independent contractor agreements	7 years after end of contract period
Insurance records, policies, claims, accident reports, etc.	Permanent
Internal audit reports	3 years
Inventory records for products, materials, and supplies	3 years
Invoices (to customers, from vendors)	7 years
Licenses and permits	Permanent
Minute books, bylaws, articles of incorporation	Permanent
Patents and related papers	Permanent
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years after termination of employment
Policies and procedures/manuals	Current version with revision history
Retirement and pension records	Permanent
Tax exemption determination letters	Permanent
Tax returns and worksheets	Permanent
Timesheets	7 years
Trademark registrations and copyrights	Permanent
Withholding tax statements	7 years