



GDPR

Document Retention Policy



Purpose

The purpose of this policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed by EIL Intercultural Learning (“EIL”) or are of no value are discarded at the proper time. This Policy is also for the purpose of aiding employees of EIL in understanding their obligations in retaining electronic documents - including e-mail, Web files, text files, audio, images, and movie files, PDF documents, and all Microsoft Office or other formatted files.

Guidelines

This Policy represents EIL’s guidelines regarding the retention and disposal of records and the retention and disposal of electronic documents as well as physical records. As a general rule, EIL will store documents electronically.

Administration

Attached to this policy as Appendix 1 is the EIL Record Retention Schedule. It provides for an initial retention and disposal schedule for physical records of EIL and the retention and disposal of electronic documents.

The Administrator shall also (i) monitor local, state, and European laws affecting record retention, (ii) annually review the record retention and disposal program; and (iii) monitor compliance with this Policy.

Unless otherwise established by the Compliance Officer (the “Administrator”) shall be in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Administrator is authorized to make recommendations for modifications to the Record Retention Schedule to the CEO to ensure that it is in

compliance with applicable laws, including modifying the appropriate document and record categories for EIL. The CEO shall ensure that the Risk Committee is updated at least annually of any significant changes made in the Record Retention Policy or in the identity of the Administrator since the previous report. If the Committee deems any such changes to be material, the policy will be brought to the Board for review and approval.

Suspension of Record Disposal In Event of Litigation or Claims

In the event EIL or any partner organisation is served with any subpoena or request for documents or any EIL employee becomes aware of a governmental investigation or audit concerning EIL or any partner organisation or the commencement of any litigation against or concerning EIL or any partner organisation, such employee shall inform the Administrator, and any further disposal of documents shall be suspended until such time as the Administrator, with the advice of counsel, determines otherwise. The Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Whenever litigation “hold” notices are sent out by counsel they must be circulated to all parties that have records related to the subject matter of the notices.

Archival documents

In addition to items marked as Perm/Archival, documents and/or records which are considered to have historical value may be exempt from the deletion timetable for their category and may be permanently stored in the EIL Archives.

Applicability

This Policy applies to all physical records generated in the course of EIL’s operations, including both original documents and reproductions. It also applies to the electronic documents generated in the course of EIL’s operations.

Appendices - Record Retention Schedule

The Record Retention schedule is organised as follows

- Detailed schedule for general records and the service areas records
- Glossary
- Detailed list of application/stakeholders material

Document Retention Schedule

The following types of documents will be retained for the following periods of time. At least one copy of each document will be retained according to the following schedule. As a general rule, EIL will store documents electronically, preferably in a pdf format.

RETENTION PERIOD

Document type	Retention Period
Published Materials	Perm/Archival
E-mails	3Y+C

Note: work email is not designed to store business records/information long-term.

Research Reports

Research Reports with archival value

Perm/Archival

Specific Service Area Records

Document type	Retention Period
Corporate Records <i>Includes Board Policies, Board meetings minutes and folders, articles of incorporation, bylaws, annual corporate reports, articles of partnership; and Annual General Meeting minutes and folders.</i>	Perm

EIL Stakeholder Information

*Note: As mentioned in the policy, deletion may be delayed or suspended **In the Event of Litigation or Claims***

Document type	Retention Period
Participant/Alumni Archival Info (names, day and month of birth, EIL Sending & Host Country and Program Year/Type)	Perm
Basic Participant/Alumni Information	Perm when kept updated/in use OR otherwise 10Y+C
Other Participant/Alumni Information	10Y+C
Volunteers	
Volunteer Archival Info (name, day and month of birth, and year/s of vol service)	Perm
Basic Volunteer Information	Perm when kept updated/in use OR otherwise 10Y+C
Other Volunteer Information	10Y+C
Host Families	
Host Families Archival Info (name, day and month of birth, and program year/s)	Perm
Basic Host Families Information	Perm when kept updated/in use OR otherwise 10Y+C
Other Host Families Information	10Y+C

Applicants (up until signature of pax agreement)

Applicants Information	2Y+C (from last application activity) unless APPLICANT becomes a participant (see Participant & Alumni categories above if applicant becomes a participant)
Inquirers	
Inquirers Information	2Y+C (from last inquiry activity)
All Other EIL Stakeholders Information	10Y+C

Accounting, Auditing, and Finance

Document type	Retention Period
Audit Reports (Annual Public Audit and all Government Grant (A-133) and other Audits)	Perm
Statutory Returns & Reports	Perm
Financial Statements - (Annual)	Perm
Reports to Government Agencies	
Present Reports & Work Papers	Perm
Tax Correspondence	Perm
Bank Folders <i>Includes account opening, signature cards & related correspondence</i>	
While active	Perm
Once Inactive	7Y+C
Bank Statements, A/P, A/R, AUDIT	
<i>Schedules, Reconciliation Worksheets, Deposit Records, & Work Papers</i>	7Y+C
Finance, Accounting Correspondence	7Y+C
Lines of Credit and Loan Agreements	Agreements = Perm.; other documents = while active - keep; once inactive - 7Y+C

Archives Records

Document type	Retention Period
<i>EIL Archives contains manuscripts, correspondence, organization records, books, audio & visual tapes, films, Publications, and personnel papers with historical value</i>	Perm/Archival

Branding, Communication, Marketing, Public Relations and Fundraising Records

Document type	Retention Period
EIL Audio and Video advertising and promotional spots and films	Perm/Archival
Grant Reports	Perm/Archival
Photo Collection	Perm/Archival
EIL Publications	Perm/Archival

Human Resources

Document type	Retention Period	
Employee Service Records/Contracts	Perm/Archival	
Salary & Pension Plan Records	Perm/Archival	

Disability & Sick Benefits Records	10Y+C	
Personnel Records		
	Document type	Retention Period
After employee is terminated/or leaves	Employee Service Records/Contracts	Perm/Archival
Tax Records	Salary & Pension Plan Records	Perm/Archival
	Disability & Sick Benefits Records	10Y+C
	Personnel Records	

Insurance and Risk Management Records

Document type	Retention Period
Insurance Policies & Reports	
Claims made policies , all endorsements, all related correspondence, & yearly summary report	10Y+C
Occurrence based policies, all endorsements, all related correspondence, & yearly summary report	20Y+C
Insurance Claims Folders <i>Includes medical claims records, reports, invoices, injury documentation, & correspondences</i>	
Until Settlement	Hold
After Settlement	10Y+C

Legal Area Records

Document type	Retention Period
Contracts & Agreements	10Y following expiration
Leases and Sub-leases	Leases = Perm; all other documents, while active = keep, when
Copyright & Trademark	Perm
Business Complaints	10Y+C
Case Folders (Student & Personnel)	
Support Cases	3Y+C
Active litigation or threat of litigation	1Y after statute of limitation runs out
Background documents related to settlements	7Y+ C
Background documentation related to judgements	End of potential appeal time
Settlement or Judgement Issued	Perm

Website Records

Document type	Retention Period
EIL Ireland	10Y+C
Global Citizen Award	10Y+C
EIL Explore	10Y+C

Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time.

B. Glossary

EIL Social Media Site	Webpages maintained by EILas a platform for online communication. Each social media site may include, but is not limited to, chat, messaging, email, video, file sharing, blogging, and discussion groups.
Blog	A web page that serves as a publicly accessible journal. Blogs, also referred to as web logs, are frequent, chronological web publications consisting of links and postings.
+C	"C" preceded by a plus sign ("+") means current year/month/day as applicable.
Copy	Copy of a document or file created and maintained for ease of access and reference. A copy is never a record copy.
Destroy	To eliminate or delete records beyond any possible reconstruction.
Document	An object containing recorded information regardless of medium and characteristics. See also: Record
Electronic Mail Message (E-mail)	A document created or received via an electronic mail system, including brief notes, formal or substantive narrative documents, and any attachments, such as word processing and other electronic documents, which may be transmitted with the message.
File	A collection of related records treated as a unit.
Files uploaded to, downloaded from, stored on 3rd party host site	Digital records acquired from or saved on websites (non-EIL) that provide access and storage capabilities.
Hold (Legal)	Legal Hold is the procedure to cease destruction of certain records, even if the record retention program mandates destruction, when litigation or government investigation related to those records is pending, imminent, or, in some cases, foreseeable. Retain the records until a temporary condition ends. After the condition ends, the retention clock starts running.
Instant Message (IM) and Chat Program Message	A form of electronic communication involving correspondence between two or more online users in real time through the internet. Including, but not limited to, typed messages, voice/video chat, file transfer, and other applications.
Metadata	Data that describes the context, content, and structure of records. "Data about other data", of any sort in any media.
Multimedia File	A file that contains graphics, animation, audio and/or video that has been archived.
Office Document	Records, documents, files, or folders that are created or maintained for business purposes. Includes, but is not limited to, spreadsheets, power point presentations, word processing documents, and paper documents.
Perm	Perm means permanent, and the record should be retained forever.
Published Material	Printed works, including but not limited to, books and newspapers.
Refile	Refile the folder or document in another series as indicated. Its retention period will be that of the series in which it finally resides.
Retention Period	The time period for which records must be maintained to satisfy legal, business or any other requirements is known as Retention Period.
Scan	A printed page or image converted into a digital file with a scanner.

Statute of Limitations	A statute limiting the time period within which a legal action can be taken concerning a particular matter within a given jurisdiction. Retention scheduling can be affected by applicable statutes of limitations.
Video Conference	A set of interactive telecommunication technologies which allow two or more locations to interact via two-way or more video and audio transmissions simultaneously.
Voicemail Message	Digitized audio message received by a voicemail box on a phone (office telephone or personal cell phone).
Webcast	A broadcast of video signals that is digitized and distributed over the Internet using streaming media technology.
Website (www.eilireland.org)	A collection of webpages, images, videos or other digital assets that are addressed with a common domain name or IP (internet protocol) address.
Wiki	A collaborative website that allows visitors to add, remove, and edit content.
Y+C	Y+C is the number of Years the record is maintained plus the Current year. Example 3Y+C means three years plus the current year.

C. EIL Programs Application/Stakeholders Material

	Note: All data related to applicants, participants, alumni, volunteers, staff and another other EIL stakeholder in which there is an existing threat of a lawsuit or an actual lawsuit, or a medical claim that has not yet been settled is subject to the terms of section 4 of the Record Retention and Destruction policy. The Policy may be suspended for documents subject to legal proceeding until Counsel has reviewed and approved for deletion.
Inquirers	Inquirers Information: name(s), addresses, phone numbers, email addresses, birth date, school; service case information (if no other service case or affiliation is related), etc.
Applicants (Stages of Application, Admission and Preparation up until signature of participation agreement)	Applicants Information: name(s), addresses, phone numbers, email addresses, birth date, school; service case information (if no other service case or affiliation is related), information provided as part of the application process, etc.
Participants / Alumni	Archival Participant/Alumni Information: name(s), day and month of birth, Host Country and Programme Year/Type.
	Basic Participant/Alumni Information: addresses, phone numbers, email addresses, birth date (year).
	Other Participant/Alumni Information:
	Visa Information: Place of Birth, State of Birth, Country of Birth, Citizenship, Passport No, Passport License Date, Visited Country
	Family Information: Live With Whom, Parents/Legal Guardians Name, Parents/Legal Guardians Address, Parents/Legal Guardians Phone Numbers, Family Members (Name, Relationship, Living at Home, Birth Date, Country of Birth), Parent/ Legal Guardian who does not live with
	A Connection: Programs & Countries Preference, Programs & Countries Attended FS
	Medical Information: Physical Restrictions & Allergies, Dietary Restrictions, Emergency Information
	Education Information: Native Language, Communication Language, Education Performance, Grade of Study,

	School Name
	Form: Disclaimer, Self Intro, Health Form (Medical Form), Parent/Legal Gurdian Remark, Authorization Form, Academic Form, Confidential Form, Consent Form, Local Partner Forms
	Picture: Self Pictures, Family Pictures, Activity Pictures, Video, Audio
	Selection Information: Inquiry Date, Inquiry Source, Inquiry Memo, How did you hear, Follow-up, Scholarship, Fee Amount, Receive Fee Date, Interviewer, Financial Screening, Application Stage & Status, Application Close Date & Reason, Responsible Organization
	Placement Information: Accepted Date, Placement Date, Host Contact Person, Responsible Organization, Host Family (Name, Placement Type, Placement Duration), Host School/CPO (Name, Org Type, Placement Type, Placement Duration)
	Travel Information: Travel Date, Travel Itinerary Plan
	Misc: Religious Affiliation, Smoking, Interests & Activities
Host Families	Archival Host Family Information: name, day and month of birth, program year/s and type
	Basic Host Families Information: birth date (year), address, phone numbers, email address
	Other Host Families Information:
	- Family Information: Family Members (Name, Relationship, Living at Home, Country/year of Birth), Number of Children, Religious Affiliation, Native Language, Communication Language, Family Interests and Activities, Religious Affiliation, Smoking, Occupation/Job for every family member.
	- Placement Information: Placement Duration, Willing to host a vegetarian or dietary restrictions, Have any pets, Family rule, Gender of willing to host
	- Facilities: School(Name, Distance, Transportation), Community(Type, Population, Closest City), Local Recreational and Cultural Facilities, Social and Economic Charcteriatrics, Ethnic Makeup, Availability of Public Transportation
	- Form:: Family Introduction Form, Confidential Form, Local Partner Forms
	- Picture: Family Pictures, Activity Pictures, Audio, Video, etc.
	- Selection Information: Inquiry Date, Inquiry Source, Inquiry Memo, How did you hear, Follow-up, Interviewer, Financial Screening, Application Stage & Status, Application Close Date & Reason, Responsible Organization, Hosting Program, Criminal Background Checks, References
	- Hosting Placement Information: Pax Name, Pax Type, Pax Status, Placement Duration, Hobbies and Interest, Biographical Summary
Volunteers	Archival Volunteer information: name, day and month of borth, years of vol. service
	Basic Volunteer Information: birth date (year), address, phone numbers, email address
	Other Volunteer Information
	- Additional Information: Occupation, Job Position, employer
	- Selection Information: Inquiry Date, Inquiry Source, How did you hear, Action Taken, Follow-up, Inquiry Memo, Registration Form Sent Date, Registration Form Received Date, Interests, Selection Process Date, Criminal Background Check, Selection Memo, References
	- Support Correspondence: Affiliation Assigned, Activities Attended, Performance and Recognition
	- Picture: Picture, Video, Audio, Likeness