



Document Retention Policy

I. Purpose

To ensure the most efficient and effective operation of Georgia Soccer, the IT staff has developed this Document Retention Policy (“DRP” or “policy”) for committee and board review and approval. The records of Georgia Soccer are vitally important to the proper functioning of the organization. Such records can exist in paper and electronic form, and both forms are subject to this policy. Questions regarding this policy should be directed to the Executive Director or the staff appointee of the Executive Director for this purpose.

The goals of this policy are to:

1. Retain important documents for reference and future use;
2. Maintain archived documents of historical significance for the organization;
3. Delete documents that are no longer necessary for the proper functioning of the organization;
4. Ensure that all staff, and relevant personnel know what documents should be retained, the length of their retention, means of storage, and when and how they should be destroyed.

Federal and State laws require organizations to maintain certain types of records for particular periods. Failure to maintain such records could subject the organization to penalties and fines, obstruct justice, spoil legal evidence, and/or seriously harm the organization’s position in potential litigation. Any Georgia Soccer personnel whether staff or volunteers must comply with this, and any future records retention or destruction policies and schedules, UNLESS specifically notified by the Executive Director or if such individual believes that (1) such records are or could be relevant to any future litigation, (2) there is a dispute that could lead to litigation, or (3) the staff person/volunteer is a party to a lawsuit, in which all personnel MUST PRESERVE such records until the Georgia Soccer legal counsel determines that the records are no longer needed.

“Records” refers to all business records of Georgia Soccer (and is used interchangeably with “documents”), including written, printed, and recorded materials (including voicemail messages), as well as electronic records (i.e. emails and documents stored electronically). All business records shall be retained for a period no longer than necessary for the proper conduct and functioning of the organization. No business records shall be retained longer than three (3) years, EXCEPT those that (1) have periods provided for herein, (2) are found in the document retention schedule in this policy, or (3) are specifically exempted by the Georgia Soccer board of directors if such exemptions do not contravene local, state or federal laws.

II. Management

To ensure compliance with this policy, the staff appointee shall serve as the DRP manager and is responsible for the following oversight functions:

1. Implementing the DRP;
2. Ensuring that all staff and relevant personnel are properly educated, understand, and follow the DRP's purpose;
3. Providing oversight on actual retention and destruction of documents;
4. Ensuring proper storage of documents;
5. Periodically following up with the Executive Director to ensure proper retention schedules are in place; where appropriate the Executive Director and DRP manager will work with legal counsel on such retention schedules;
6. Suspending the destruction of documents upon foreseeable litigation; and
7. Keeping Georgia Soccer staff, board of directors, and appropriate volunteers apprised of changes in relation to the DRP.

The DRP manager shall annually review the policy, propose modifications accordingly, and inform and educate the board of directors through the Executive Director of any such changes. Once and if approved by the board of directors, all Georgia Soccer personnel whether staff or appropriate volunteers will be informed and educated of such changes by the DRP manager. All questions relating to document retention and/or destruction should be directly addressed to the DRP manager or the Executive Director.

III. Types of Records

Tangible Records

Tangible records are those in which you must physically move to store, such as paper records (including printed versions of electronically saved documents), photographs, audio recordings, and promotional items. Active records and records that need to be easily accessible should be stored in the either in an onsite physical location, or on the Georgia Soccer file server. Inactive records should be stored in the proper onsite physical location, or in the designated digital archive location.

All tangible records will be stored in these physical locations pending the implementation of an electronic Document Management/Imaging solution. At that point, a specific electronic location will be designated for these records.

Electronic Records

Electronic records are those that are stored digitally on computers, servers, mobile devices, and any other electronic storage medium. These records are subject to the same retention and destruction

policies as tangible records. Destruction procedure will differ for these records due to their digital format.

Electronic Mail (E-mail) is considered an electronic record and, as such, is subject to the same retention and destruction policies. The retention period for E-mail varies from other electronic records and is stated in the DRS.

The Document Retention Schedule (“DRS”) contains an itemized listing of all types of records and their corresponding retention periods.

IV. Storage

Standard Storage Practices

▪ *Tangible Records*

All tangible records considered pertinent to daily operations will be kept in the Georgia Soccer offices. The designated storage locations for these tangible records will be at the discretion of the responsible staff member.

All tangible records not specifically under the ownership of a staff member will be stored in the Georgia Soccer Archive Room.

All tangible records are to be stored in the above stated locations until which time a Document Imaging solution is introduced, at which point all tangible records will be transferred into electronic files.

▪ *Electronic Files*

Electronic files are considered to be any document, image, or other such record that is stored in an electronic format. All electronic records will be stored on the Dynasis file servers associated with the Georgia Soccer Utility account, or on the Georgia Soccer website server located at SAGO networks.

All electronic files are to be stored for the period of time specified in the DRS, at which time they are to be deleted in accordance with the methods outlined in this policy.

▪ *Email*

All Georgia Soccer email communications are stored on a managed server appliance. Email communications are to be stored on this appliance in the mailbox of the responsible staff or personnel member until which time the message is to be deleted in accordance with the DRS.

▪ *Voicemail Messages*

Voicemail Messages are to be treated as electronic communications under the same guidelines as email communications. These files are stored in audio format and are stored on the Cisco Phone System Server. These messages should be deleted in accordance with the specified lifespan in the DRS.

Business related voicemail messages that are stored on Georgia Soccer owned business mobile devices are subject to the voicemail message guidelines.

V. Destruction/Deletion of Records

Tangible Records

Tangible records are to be stored in their designated storage facilities until the lifespan of the record specified in the DRS has been reached. At this time the record is to be recycled in accordance with the Georgia Soccer Sustainability Plan. Records containing sensitive information of any kind are to be shredded by staff as necessary. Once shredded, these records are to be recycled in the standard method outlined in the Sustainability plan.

Electronic Records

Electronic Records are to be stored in their designated server and drive locations until the lifespan of the record specified in the DRS has been reached. At this time record is to be deleted from the digital location where it resides. This process is to be completed by the staff member or personnel responsible for that digital location or by an automated process to be installed at a later date.

In the case of electronic records considered to be of a sensitive nature requiring increased data security, the process of destruction/deletion may extend to the media on which the data is stored (referred to herein as “sanitization”). Media sanitization is to be completed by a simple file deletion, secure file overwriting (“purging), or physical destruction of the storage media. In the event that storage media is recommended by the Executive Director for sanitization, the following questions will be asked to determine the method of sanitization:

1. What type as size of media storage is in question?
2. What is the confidentiality of the data stored on the media?
3. Will the media be processed in a controlled area?
4. Should the sanitization process be conducted within the organization or outsourced?
5. What is the anticipated volume of media by type to be sanitized?
6. What is the availability of sanitization equipment and tools?
7. What is the level of training for personnel necessary to use sanitization equipment/tools?
8. How long will sanitization take?
9. What type of sanitization carries the highest cost when considering tools, training, validation, and reentering media into usage?

Once a decision regarding which of the sanitization methods is to be employed, the following methodology matrix is to be used to determine the proper actions to take dependent upon media type:

Media Sanitization Methodology Matrix

Media Type	Purge	Physical Destruction
<i>Magnetic Disk</i>		
Floppies	Overwrite media by using organization approved software and validate overwritten data.	<ul style="list-style-type: none"> ▪ Shred ▪ Incinerate using licensed incinerator.
Hard Drives	Overwrite media by using organization approved and validated overwriting technologies/methods/tools.	<ul style="list-style-type: none"> ▪ Disintegrate ▪ Shred ▪ Pulverize ▪ Incinerate using licensed incinerator.
USB Removable Media (Pen Drives, Thumb Drives, Flash Drives, Memory Sticks) with Hard Drives	Overwrite media by using organization approved and validated overwriting technologies/methods/tools.	<ul style="list-style-type: none"> ▪ Disintegrate ▪ Shred ▪ Pulverize ▪ Incinerate using licensed incinerator.
Back-Up Tapes (Internal, External)	Overwrite media by using organization approved and validated overwriting technologies/methods/tools.	<ul style="list-style-type: none"> ▪ Disintegrate ▪ Shred ▪ Pulverize ▪ Incinerate using licensed incinerator.
<i>Optical Drives</i>		
CD/DVD	See Physical Destruction	

Source: NIST Special Publication 800-88; *Guidelines for Media Sanitation*

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VI. Cessation of Record Destruction/Deletion

If a lawsuit is filed or imminent, or a legal document request has been made upon Georgia Soccer, **ALL RECORD DESTRUCTION MUST CEASE IMMEDIATELY**. The DRP manager may suspend this DRP in consultation with the Executive Director and legal counsel, as appropriate, to require that documents relating to the lawsuit of potential legal issue(s) be retained and organized. A critical understanding of this section is imperative. Should this protocol fail to be followed, any offending staff or volunteer may be subject to standard review and sanction as found in association administrative policies.