



RECORDS RETENTION POLICY

Approved by the Board of Directors April 14, 2007
Revised April 8, 2017

Introduction

Geneva Lake Conservancy, Inc. (GLC), recognizes that the appropriate production, maintenance and security of its corporate records are essential to all aspects of its mission. This Policy includes a process by which the land trust documents and the intentions of the donors and granting organizations, relating to land held under conservation easement or in fee ownership, are protected and preserved, thereby assuring public trust in and charitable status of GLC – all of which are critical to furthering its goals.

Procedures for each section of this Policy have been developed and reviewed by appropriate staff, legal and accounting counsel and Executive, Finance, Advocacy and Land Protection Committees. This Policy is intended to conform to all requirements of law and to the Land Trust Standards and Practices of the Land Trust Alliance (LTA), and it supports and is integral to other GLC policies. All GLC records, including, but not limited to, files and policies, whether electronic or hard copy, are the property of GLC.

The GLC Executive Committee is empowered by the Board of Directors to develop and amend related corporate procedural documents, as needed, to implement this Records Policy.

Records Policy Review - In an effort to ensure compliance with law and best practices and that the policies stated herein continue to serve the best interests of GLC, the GLC Executive, Finance, Land Protection, Governance and Advocacy Committees, shall review this Policy every five years, at a minimum.

Section 1 – Conservation Project Records - GLC staff creates and maintains files for each conservation project in physical and electronic (digital) form, as appropriate. The Manager of Land Protection and the Executive Director are responsible for managing the conservation project records. Conservation projects include, but are not limited to, conservation easements, land acquisitions, land donations, bargain sales, historic preservation and similar projects in which GLC supports another conservation entity as a conservation partner.

GLC's Land Protection Committee (LPC) and Board of Directors will preliminarily review and approve all conservation projects. Formal conservation project files are created when the LPC provides preliminary approval for a conservation project. Formal conservation project files contain:

- Archive File – The archive file holds originals of all irreplaceable documents essential to characterize and enforce the terms of each transaction and to ensure the long-term stewardship and defensibility of the protected lands and their conservation values. The following are considered to be “essential or irreplaceable documents”:

 - legal agreements and notices, including grant-related documents;
 - property deeds;
 - conservation easements and amendments thereto;
 - baseline reports for owned and easement properties;
 - annual monitoring/inspection reports for owned and easement properties (*);
 - appraisals (*);
 - title commitments and policies;
 - property surveys (i.e., boundary and ALTA surveys);
 - IRS Forms 8283;
 - Contracts and leases related to long-term property stewardship; and
 - Formal easement and property stewardship related notices and other critical correspondence.

With the exception of the document categories noted above with asterisks, the Archive Files are stored off-site, at locations indicated in the attached Records Retention Schedule, and are to be protected from theft or loss and from physical hazards. The post-acquisition archives for the document categories indicated above by asterisks consist of digital scans that are stored on the off-site server, with the original hard-copy being stored in a secure off-site location. This process is necessary to accommodate the large amount of paperwork produced during property and easement stewardship, and the ever-increasing costs necessary for storage at a secure off-site facility. The archive process is described in more detail in Section 2 of this document. Generally, an Archive File is not prepared for a conservation project that is not completed (i.e., one that does not result in a transfer of any property right).

- Project File – The Project File is a working file established for every conservation project, whether easement or owned property, held by GLC, is maintained on-site, generally in a binder, and contains copies of the materials in the archive (the essential documents), as well as originals of other project-related documents, such as vegetation and wildlife inventories, maps and correspondence. This file contains the most comprehensive information associated with an easement project and is to be accessed on a regular basis.
- Property Management File – A Property Management File is a subset of the Owned Property File that is created for fee-owned properties and is to be accessible on a daily basis in support of site monitoring and restoration activities.

GLC staff tracks the development and progression of conservation projects, including the documents produced from such interaction, using both hard copy and digital project management tools in accordance with applicable corporate policies and procedures.

Audits of Project Records – GLC staff reviews the archive files, office files and electronic files every five years, to ensure that conservation project records are present, complete and organized; and to verify that documentary evidence, including photographic records and original documentation, is not deteriorating beyond the point of usefulness. This review can be accomplished through an examination of 20% of the project files (including paper and electronic versions) every year, on a rotating basis.

Section 2 – Off-Site Records Storage - GLC stores its essential conservation project documents, corporate documents, and digital back-ups of the office network server files at one or more secure off-site facilities. The attached Records Retention Schedule identifies specific records that are archived, as well as their storage location and time of residency.

Hard-Copy Archive System - The original essential documents are stored in one or more bank safe deposit boxes, fire safes or secure off-site locations, for protection from degradation from daily use, theft or loss, and from physical hazards, such as fire or water leakage. Access to the archive files is limited to the Executive Director, Manager of Land Protection and officers of GLC. Removal of any document from an off-site archive facility is allowed only under special conditions, is to be logged and only for a limited time. A record of all off-site storage facilities and their locations and an inventory of all contents is maintained at the GLC office.

Digital Versions of Documents - Digital versions of essential documents and other important project documents are created by scanning the original document. To ensure a quality product, the document is scanned at a resolution of at least 200 dpi (dots per inch), either in color or black and white, per the original, and the resulting product is viewed on-screen to confirm the quality. The digital files are stored on the off-site network server and further protected in an off-site archive, as described in the Records Retention Schedule. The retention schedule for a particular digital file will generally correspond with that of its hard copy counterpart, but may be longer as desire or need may dictate. GLC will monitor the trends in digital archive technology to ensure that its e-records are maintained in a format that ensures long-term viability.

Digital Document Back-up System - The GLC computer network server is hosted at an off-site commercial facility and accessed remotely by all GLC staff. Remote access to the server is obtained through a secure (256-bit encrypted) internet connection. In this way, access to GLC working e-files is maintained 24-hours a day from any location providing internet service. The network server data are backed up daily by the hosting facility. The back-up is then stored at a secure location other than where the network server is housed. If the server hosting location is damaged, access can be established through another remote server. This configuration also provides the following advantages: (i) it maintains reliable, retrievable data in the case of local or remote computer malfunction; (ii) it maintains non-critical, yet important, documents for future reference; and (iii) it preserves multiple digital copies of physical documents and photographs that may otherwise deteriorate over time.

Section 3 – Financial Records - GLC maintains complete, accurate and credible documentation of its financial management activities and status. GLC follows Generally Accepted Accounting Principles (GAAP) in managing and auditing its financial records. An independent audit by a certified public accountant is performed annually and is available for review by funders, members and donors, as appropriate and necessary.

The types of financial records maintained include those in GLC's accounting software: monthly, quarterly, and annual reports; balance sheets; budgets; reconciliations and cancelled checks; invoices and receipts of payables; copies of checks deposited; and copies of donor restrictions. The accounting software is password protected, as are certain financial reports maintained on the network server. Retention of these documents is in accordance with IRS requirements, per Section 8 below.

Due to the confidential nature of certain documents, access to some records is limited to the Executive Director, the Accountant, and members of the Executive Committee. Examples of such documents include personnel files, payroll records, and portions of payroll tax returns not subject to public disclosure. These documents are stored on-site in a secured area. Specific reports that do not contain confidential information are made available to staff and volunteers, as appropriate.

Section 4 – Personnel Records - Personnel files of each employee's personal and work-related information are maintained by GLC as outlined in the GLC Personnel Policy. Personnel records are maintained, according to laws of the State of Wisconsin, for each employee and are confidential. To that end, access to personnel files is limited to the Executive Director and members of the Executive Committee. Each employee is given access to his or her individual file. Physical copies of the personnel records are stored on-site in a secured area and are managed in accordance with the attached Records Retention Schedule.

Section 5 – Fundraising Records - GLC is committed to raising funds in an ethical and accountable manner. GLC complies with all applicable charitable solicitation laws, accurately represents its claims and intended use of funds, and uses restricted funds as specified by donors. GLC maintains accurate and complete records regarding its fundraising activities. Donor records are maintained by the Director of Development in a secure data base, as well as by the Accountant.

Section 6 – Outreach Records - Outreach records provide continuity regarding public event offerings and focus from year to year. Outreach records serve as a resource to educate volunteers, staff, and event coordinators so that they better align GLC events with GLC’s vision. Outreach records, both digital and hard copy, are maintained and managed by GLC staff and volunteers on an as-needed basis, and therefore are not reflected in the retention policy.

Section 7 – Administrative Records Management - GLC maintains secure, accurate and appropriate records of its business activities, board meetings, and office administration. In addition, the Executive Director keeps files on directors and potential directors. On an annual basis, the Board Governance Committee will decide which files should be kept and which should be destroyed.

Section 8 – Advocacy Issues Records – GLC will retain digital records of position papers, crucial correspondence and other major documents related to advocacy issues for a minimum of 10 years. The Advocacy Committee will annually review these files to determine, which should be maintained or destroyed.

Section 9 – Record Retention Schedule - GLC retains its corporate records in accordance with governmental rules and regulations and best business practices. The attached Records Retention Schedule contains the storage locations and retention time frames for documents that have been identified as critical or important to the organization. Because no list can be both all-inclusive and manageable, and because regulations and business practices change with time and technology, the Records Retention Schedule will be reviewed every five years and modified, as necessary. Destruction of business records after the applicable holding period expires is performed by or under the direction of the Executive Committee. To ensure the privacy of GLC’s records, obsolete business records are shredded.

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RECORDS RETENTION SCHEDULE

Hard-Copy Archive System

Safe Deposit Boxes (2)
Town Bank
671 Kenosha St.
Walworth, WI 53184

(262)-275-8286

Archive Documents of the following GLC Conservation Projects as of November 12, 2016:

Original Conservation Easements documents and baselines for the following (Year acquired) :

Styberg (1985)
McEssy (1990)

Petersen (1993)
Geraldson (1993)
Driehaus (1998)
Covenant Harbor (1998)
Town of Linn Nature Park (2000)
Cobalt Farms (2000)
Abbey Ridge (2000)
Home Depot (2000)
Tameling & Newton (2002)
WWOA-Drumlin Farm (2002)
Moelter (2003)
Wooddale (2003)
Delavan North Shore – Burke (2004)
Delavan North Shore – Piccolo (2004)
Black Point (2005)
Sugar Creek (2006)
Hildebrand Woods (2006)
Woodstone Prairie (2006)
Love (2007)
Vieterhof West (2009)
Kishwaukee Nature Conservancy (2011)
B. Griffith (2012)
D & L Griffith (2012)
Honey Creek Farm (2013)
Nokomis Farm (2013)
Krusenbaum Farm (2013)
Colman Woods (2015)

Fee-Owned Properties Deeds and Transfer documents (Year acquired)

Maple Hills (1999)
Mill House (2000)
Hermansen Woods (2000)

Digital Versions of Conservation Project Documents

Scanned by and stored at:

Town Bank Safe Deposit Box

Financial Records

The GLC uses a Web-based Quickbooks version that allows off-site storage of financial records.

Personnel Records

All GLC Personnel Records are kept in a secure file in the Executive Director's office.