



HOPE VALLEY SCHOLARS INC.

Document Retention and Destruction Policy

Keep what must be preserved. Protect it well. Dispose of it securely.

This policy defines how Hope Valley Scholars classifies, retains, protects, suspends destruction of and securely disposes of governance, financial, scholarship, safeguarding and other records.

OUR COMMITMENT: Hope Valley Scholars applies this document to the programs, people and activities within its scope. Questions or requests for an accessible copy may be sent to the contact information below.

Version	1.0
Policy owner	Board Secretary and Treasurer
Effective date	01/01/2026
Review cycle	Annual
Website address	https://www.hopevalleyscholars.org/Documents/pdf/Hope%20Valley%20Scholars%20Document%20Retention%20and%20Destruction%20Policy.pdf

Organization: Hope Valley Scholars Inc. | U.S. 501(c)(3) public charity | EIN 41-2924425

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1. Purpose and scope

Hope Valley Scholars Inc. shall keep complete and accessible records sufficient to document charitable activities, governance, income, expenses, restrictions, scholarship decisions, payments, safeguarding and legal compliance, while avoiding unnecessary retention of sensitive personal information.

2. Core rules

- Keep the official record in an approved system with a responsible owner, access control, backup and recoverability appropriate to risk.
- When several legal, tax, grant, contract, insurance or policy periods apply, use the longest applicable period.
- Technical ability or convenience alone is not a reason to retain personal information indefinitely.
- Delete convenience copies, local downloads and transitory messages when no longer needed and the official record has been verified.
- Never alter, conceal or destroy a record to obstruct an audit, complaint, investigation, lawsuit, government request or anticipated proceeding.

3. Default retention schedule

Record category	Default minimum period
Articles, bylaws, amendments, Board and committee minutes, resolutions and signed policies	Permanent
EIN, exemption application, IRS determination letter and material tax-exempt correspondence	Permanent
Filed annual returns, supporting tax work papers and state filings	7 years after filing; retain final filed returns permanently when practicable
Annual financial statements and year-end general ledger	Permanent
Invoices, receipts, bank records, reconciliations, expenses and deposits	7 years after fiscal year
Donor restrictions, grant agreements, reports and closeout	7 years after completion; permanent for enduring restrictions
Contracts, vendors, partners and insurance	7 years after expiration or final claim; longer for material continuing rights
Unsuccessful scholarship applications	3 years after final decision; remove headshot or identity copy after 1 year unless required
Selected scholar applications, awards, payments and progress records	7 years after support ends; longer when law, grant or safeguarding needs require
Routine mentorship and program administration	3 years after participation ends
Safeguarding reports and investigations	At least 10 years after the child reaches 18, or longer as law, counsel or insurer requires
Whistleblower, discrimination, complaint and appeal records	7 years after closure; longer for safeguarding, litigation, insurance or hold
Privacy notices, consents, withdrawals and media releases	7 years after last relevant use or withdrawal
Material security or data-breach records	7 years after closure; routine technical logs ordinarily 1 year
Approved public reports, final impact reports and controlled policy versions	Permanent archival copy

SCHEDULE CAUTION: These periods are defaults, not automatic permission to destroy. Confirm law, grant, insurance, audit, complaint, request and legal-hold requirements before disposition.

4. Legal holds

A person who receives notice of a lawsuit, subpoena, audit, investigation, complaint, claim, government request or reasonably anticipated dispute shall immediately notify the Board Chair and Secretary. The Secretary or counsel shall issue a written hold identifying records, systems and custodians. Covered deletion, device replacement, auto-delete and backup cycling must be suspended until written release.

5. Storage, access and cross-border records

- Use least-privilege access, strong authentication, encrypted transport and approved storage appropriate to sensitivity.
- Separate safeguarding, complaints, background screening, identity and financial records from routine program files.
- Do not send full applications, transcripts, fee statements, references, headshots or complaint details through ordinary notification email.
- Require relevant providers to maintain confidentiality, security, incident notice, return or deletion and cooperation with lawful requests.
- Document necessary cross-border access and transfer safeguards for records used in the United States and Kenya.

6. Annual review and destruction

- 1 At least annually, record owners identify records whose period has expired and confirm the category, official copy and absence of a hold or continuing lawful purpose.
- 2 The Policy Administrator reviews the proposed disposition and obtains additional legal, tax, grant, insurance or safeguarding advice when appropriate.
- 3 Sensitive paper is cross-cut shredded or destroyed by an approved service. Electronic records are securely erased or irreversibly anonymized according to approved technical procedures.
- 4 A destruction log records category, inclusive dates, approximate volume, system, authority, method, date and approvals without reproducing the destroyed sensitive content.

7. Violations and incident response

Unauthorized access, removal, alteration, disclosure or destruction may result in access removal, corrective action, contract remedies, discipline, notification, referral or legal action. Suspected loss, unauthorized disclosure or destruction must be reported promptly for containment and assessment.

Appendix A - Destruction log

Record category, owner and inclusive dates

System or location and approximate volume

Retention authority and confirmation that no hold applies

Destruction, deletion or anonymization method

Record owner	Approval	Date
Policy Administrator	Approval	Date

Official references

- [IRS recordkeeping requirements for exempt organizations](#)
- [Kenya Data Protection Act, 2019](#)

Document control: The current public version is maintained by Hope Valley Scholars Inc.; printed or downloaded copies may become outdated. **Related:** [Privacy Policy](#) | [Whistleblower Policy](#).
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