

FOR DECISION

The Director of Internal Audit proposed to the Audit and Finance Committee that it review several modest revisions to the Document Retention Policy.

The Audit and Finance Committee recommends to the Board that it:

- Approve the revised Document Retention Policy.

Revised Document Retention Policy

The Board approved the document retention policy in June 2009 which governs the preservation and, where applicable, permissible destruction of certain GAVI Alliance documents¹. It is intended to meet recognised practices and accounting standards for retention periods and to provide guidance on the circumstances which could require longer or indefinite periods of document preservation.

Since its approval, the Director of Internal Audit has reviewed the policy and has suggested that it reflect that he will maintain custody of internal audit records. In addition, the retention periods of these records have been extended.

Also the names of certain archiving teams have been changed to reflect the new Secretariat structure. (For example, “Corporate Services Team” has been rolled into the “Finance & Operations Team.”)

Given that the Board approved the original policy upon the Audit and Finance Committee’s recommendation, the Committee reviewed the suggested changes and found them fit for recommendation.² The Board is now requested to approve the changes to the policy (a red-lined version of which is enclosed).

¹ Resolution 9 from the 2-3 June 2009 Minutes.

² Section 4 from the 11 March 2010 Audit and Finance Committee Minutes

FOR DECISION**GAVI ALLIANCE
DOCUMENT RETENTION POLICY**

Approved on 2-3 June 2009

1. Purpose

The GAVI Alliance is committed to being a transparent and accountable organisation. As such, the Document Retention Policy shall govern the preservation and, where applicable, permissible destruction of certain GAVI Alliance documents. It is intended to meet recognised practices and accounting standards for retention periods and to provide guidance on the circumstances which could require longer or indefinite periods of document preservation.

2. Definitions

Terms found in this policy shall have the same meaning as they do within the GAVI Alliance Statutes and By-laws. Further, the following definitions shall apply:

- **“Records”** - all finalised documents, reports, diagrams, correspondence, emails, and other physically or electronically stored material, and other business records regardless of where they are located or stored, including those stored in a desk drawer, office, file cabinet, record center, hard drive, personal computer or lap-top, or off-site location.
- **“Archiving Team”** – The Secretariat team responsible for preserving a pertinent final Record.
- **“Retention Period”** – the length of time a final Record must be preserved after it has been archived.

3. Retention

Each member of the Secretariat who generates Records described in Attachment 1 is responsible for submitting it to the Archiving Team which in turn is responsible for placing it in the appropriate physical or electronic archive. Draft, unfinalised versions of Records do not need to be retained.

A Record must be preserved for at least the Retention Period. Further, every member of the Secretariat is prohibited from destroying, materially altering, or deleting any Record until the expiration of the Retention Period. Only a member of the pertinent Archiving Team may delete a Record after the expiration of the Retention Period.

FOR DECISION**4. Extension of Retention Period**

If a member of the Secretariat believes or is informed that a Record is or may be the subject of litigation, or pertaining to a claim, audit, investigation or enforcement action, then the Record cannot be destroyed, altered in any way, or deleted and must be kept until the General Counsel (or the Secretary in the case of Board and Board Committee Packs and Minutes) in his/her sole discretion determines that the Record is no longer needed at which point the retention period shall be reset.

5. Disclosure to Third Parties

Nothing in this policy is deemed to waive any GAVI Alliance privilege or immunity, including the archive privilege. Before disclosing any Record to an outside party in connection with any litigation, claim, audit, investigation or enforcement action, a member of the Secretariat shall consult with a member of the Legal Team about the applicability of the archive privilege.

Attachment 1

Record	Retention Period	Archiving Team
Accounts payable ledgers and schedules	7 years	Finance & Operations Team
Audit reports	Permanent	Finance & Operations Team
Bank reconciliations	2 years	Finance & Operations Team
Bank statements	3 years	Finance & Operations Team
Board and Board Committee Packs and Minutes	Permanent	Secretary/Governance Team
Checks	Permanent	Finance & Operations Team
Contracts, notes and leases after expiration	7 years	Legal Team
Deeds, mortgages and bills of sale	Permanent	Legal Team
Depreciation schedules	Permanent	Finance & Operations Team
Employment applications	5 years	HR Team
Year End Financial Statements	Permanent	Finance & Operations Team
Insurance policies (expired)	3 years	Legal Team
Insurance records, accident reports, claims, policies	7 years	Legal Team
Internal audit reports	Permanent	Internal Audit
Internal audit workpaper files	7 years	Internal Audit
Inventories of products, materials and supplies	7 years	Finance & Operations Team
Invoices (expired)	7 years	Finance & Operations Team
Leases (expired)	3 years	Legal Team
Legal files	10 years	Legal Team
Marketing and related sales documents	7 years	External Relations Team
Payroll records and summaries	7 years	HR Team
Personnel files	5 years	HR Team
Press releases	Permanent	External Relations Team
Retirement and pension records	Permanent	HR Team
Tax returns and worksheets	Permanent	Finance & Operations Team
Timesheets	7 years	HR Team
Trademark registrations, copyrights, intellectual property, trade	Permanent	Legal Team
Withholding tax statements	7 years	HR Team