

# NATIONAL AIR TRAFFIC CONTROLLERS ASSOCIATION DOCUMENT RETENTION POLICY

This document constitutes the Document Retention Policy and Procedures (hereinafter the “Policy”) of the National Air Traffic Controllers Association (“NATCA” or “Union”). NATCA records must be retained so long as the records are: (1) necessary to the current conduct of Union business; (2) required to be retained by applicable statute or regulation; (3) relevant to pending or foreseeable investigations or litigation; or (4) of historical value to the Union.

1. Coverage. The Policy covers the NATCA National Office and all NATCA Regional Offices, Committees and Locals. All NATCA National Officers, National Office Staff, Regional Office Staff, Committee members and Local Union representatives are required to adhere to this Policy.

2. Administration of the Policy. The NATCA National Executive Board (“NEB”) will administer the Policy. The NEB may delegate its administrative responsibilities under this Section to the Document Retention Committee, comprised of the NEB Liaison, the Executive Director, the General Counsel, the Assistant General Counsel, the Office Manager and the Director of IT.

3. Document Retention Schedule. Records of the NATCA National Office, Regional Offices and Committees must be maintained in accordance with the attached NATCA National Document Retention Schedule. Records of Local Union offices must be maintained in accordance with the attached Local Document Retention Schedule. NATCA’s Assistant General Counsel will conduct an annual review of both document retention schedules to ensure that the timeframes comport with applicable law, rule, or regulation and meet the Union’s needs. Any amendments to either document retention schedule must be made in accordance with Section 12, below.

4. Education and Updates. NATCA’s Executive Director and Assistant General Counsel will ensure that all NATCA National Office employees, Regional Office employees, Committee members and Local Union representatives are notified of and educated on the Policy prior to its implementation. In the event that either document retention schedule is revised, the Assistant General Counsel will issue an electronic notice with the revised document retention schedule to those employees affected by the change(s).

5. Electronic Records. All records, including those maintained in electronic format, are covered by the Policy. Documents in electronic format shall be retained and disposed of in the same manner as hard copy documents. Electronic mail is not covered by the Policy.

6. Retention Method. Documents may be stored electronically and/or in hard copy, depending on the retention method prescribed in the applicable document retention schedule. Where the applicable document retention schedule indicates “E,” one copy of the document must be stored electronically, as defined below, and any hard copies must be destroyed. Where the applicable document retention schedule indicates “E and H,” one copy of the document must be stored electronically with a hard copy backup. Where the applicable document retention schedule

indicates “E or H,” the document may be retained either as an electronic copy or in hard copy format. For example, documents of a certain type may have been retained in hard format in previous years but are now saved only in electronic format.

a. When saving documents electronically, National Office Departments, Regional Offices, Committees and Local Union offices are encouraged to minimize redundancies in electronic storage. For example, several employees should not maintain separate electronic copies of the same document unless necessary.

b. Local offices are encouraged to maintain backup systems for all electronic storage.

c. NATCA National Officers, employees of the National Office and Regional Offices, and Committee members are required to observe the following:

i. Method of Electronic Retention, PC Users. PC users must retain the required electronic documents on the NATCA National Office servers, unless the NATCA National Document Retention Schedule prescribes another method, (e.g., Union Ware).

ii. Method of Electronic Retention, Mac Users. Mac users may retain the required electronic documents on their hard drives as long as they have Time Machine backup. However, Mac users are strongly encouraged to retain the required electronic documents on the NATCA National Office server.

iii. Other Methods. If the NATCA National Document Retention Schedule prescribes another method of electronic storage, such as UnionWare, natca.org or other vehicle, the document should be stored via that vehicle only, unless stated otherwise in the retention schedule.

7. Retention Timeframes Established by Law, Rule or Regulation. Notwithstanding any retention periods set forth in the applicable document retention schedule, NATCA records must be retained for at least the minimum period established by applicable law, rule, or regulation.

8. Destruction of Records. Destruction of NATCA records shall be carried out in accordance with the Policy and the applicable document retention schedule. All documents containing the personally identifiable information (e.g., full name, home address, date of birth, social security number) of an employee or member shall be shredded and all other documents shall be recycled. Any questions regarding destruction of documents should be directed to the Assistant General Counsel. If the purging entity believes that any document may be of historical significance, the documents should be provided to the NATCA Office of General Counsel for the review of the Document Retention Committee.

a. National Office and Regional Offices. Each National Office Department and each Regional Office must conduct a document purge every six (6) months. The

Assistant General Counsel will issue a biannual reminder notice, providing instructions on how and when to conduct the purge.

- b. Committees. Committees must conduct a purge, in accordance with the NATCA National Document Retention Schedule, at least once per year.
- c. Locals. Locals are strongly encouraged to conduct a purge, in accordance with the Local Document Retention Schedule, at least once per year.

9. Pending or Foreseeable Litigation or Investigation. The destruction of records shall be suspended immediately upon receipt of legal process or other notice of pending or foreseeable investigation or litigation. In the event NATCA receives notice of pending or foreseeable litigation, the Office of General Counsel will issue a Red Alert Notice to all affected. The Red Alert Notice will provide instructions to those affected as to how to proceed. Immediately upon receipt of a Red Alert Notice, the NEB and its designees shall ensure that all records are secured to prevent the destruction of documents. This suspension shall be lifted only upon written authorization from the Office of General Counsel.

10. Annual Audit. The Assistant General Counsel, with the assistance of the Executive Director, will conduct an annual audit of NATCA's records to ensure adherence to the Policy. NATCA managers, Committee Chairs and Local Union representatives are responsible for ensuring that any subordinates comply with the Policy throughout the year.

11. Violations of the Policy. Failure on the part of any NATCA employee to follow the Policy may result in civil and/or criminal sanctions against the organization and its employees, and/or disciplinary actions against the employees responsible. NATCA managers, Committee Chairs and Local Union representatives are required to periodically review any subordinates' document retention practices to ensure that they are in compliance with the Policy.

12. Interpretation & Amendment of Policy. The NEB, in conjunction with the Office of General Counsel, shall be responsible for interpreting the Policy. Any proposed amendments to the Policy or the document retention schedules must be submitted to the Office of General Counsel, in writing, and approved by the NEB. Amendments approved by the NEB will take effect immediately.

13. Effective Dates. The Policy shall take effect as follows:

- a. National Office, Regional Offices and Committees: January 1, 2014
- b. Local Union Offices: March 1, 2014

As of the applicable effective date, the National Office, Regional Office, Committees and Locals will begin the transition to full compliance with the Policy and the applicable document retention schedule. The transition to full compliance is expected to occur throughout calendar year 2014.