

A. **PURPOSE.** To establish standard guidelines for the retention and disposition of all records created as a result of law enforcement activities and other related support functions of the Grand Rapids Police Department.

B. **APPLICATION.**

1. This directive applies to records that are created by the Grand Rapids Police Department or its members or to records that are in the custody of the Grand Rapids Police Department. For purposes of this directive, a record shall mean written or recorded information in any form that is created or received by the Grand Rapids Police Department in connection with its official law enforcement activities and its internal operation and management.

C. **NON-RECORD MATERIALS.**

1. The Grand Rapids Police Department may dispose of non-record materials as soon as they have served their intended purpose.

- a. Each unit or other subdivision of the Grand Rapids Police Department which creates or prepares records during the course of its official operations or which is the custodian of records that are created or prepared by the Department or its members shall determine the retention period of all non-records material in relation to the responsibilities and operation of the unit.

2. **TYPES OF NON-RECORDS.**

- a. The following types of documents and materials are not records of the Grand Rapids Police Department.

- (1) Extra copies of documents retained only for convenience of reference, such as “for your information” documents, tickler files, follow-up of correspondence, word processed files when the official record copy is printed and retained by the Department, and extra or identical duplicate copies of records if the official record has been retained by the Department or other appropriate City of Grand Rapids custodian.
- (2) Publications, forms, and printed documents including stocks of those which are superseded or outdated.

- (3) Preliminary drafts of letters, memoranda, reports, worksheets, and internal notes (including those that are typed or word processed) that do not represent significant basic steps in the creation or preparation of public records.
- (4) Shorthand notes and other notes or recordings that have been transcribed or incorporated into another format for official retention purposes.
- (5) Miscellaneous notices or memoranda (including e-mail messages) which do not relate to the legal and functional responsibilities of the Department, such as notices of organizational events, employee benefits, holidays, etc.
- (6) Media used for printing or other record reproduction processes.
- (7) Catalogs, trade journals, and other publications or papers that are received from outside sources and are not essential to the operation of the agency.

D. CUSTODY OF RECORDS.

1. RECORDS CUSTODIANS.

- a. The commanders or supervisors of the following subdivisions of the Grand Rapids Police Department shall be considered to be official custodians of records created and retained by the Department and its members:
 - (1) Office of the Chief of Police
 - (2) Internal Affairs Unit
 - (3) Training Bureau
 - (4) Support Services Division
 - (a) Financial Services Unit
 - (b) Records Unit
 - (c) Property Management Unit
 - (d) Traffic Unit
 - (5) Office of Special Events

- (6) Detective Unit
 - (a) Investigations
 - (b) Forensic Services
- (7) Vice Unit
- (8) Special Response Team
- (9) Canine Unit
- (10) Communications Bureau

2. RESPONSIBILITIES OF RECORDS CUSTODIANS.

- a. A designated custodian of Department records shall develop and implement a policy specific to the needs of the unit with regard to the retention, management, and disposition of any records created or maintained by that unit, which shall include the following:
 - (1) Conducting inventories of records.
 - (2) Evaluating records for a determination of their useful life in the operation of the specific unit and of the Department.
 - (3) Determining the appropriate retention period for each category of records maintained by the custodian.
 - (4) Providing for safekeeping of the retained records.
 - (5) Providing for access to and retrieval of retained records,
 - (6) Providing for proper destruction and disposal of records.

E. APPROVAL OF RECORDS RETENTION POLICY.

- 1. All records retention policies that are developed pursuant to this directive shall be submitted to the Police Chief, the Police Legal Advisor and City Attorney, and the City Clerk for their approval before implementation.

F. RETENTION OF VITAL RECORDS.

1. Records custodians designated under this policy shall determine the categories of records which shall be considered vital to the operation of the Grand Rapids Police Department.
2. Records custodians of vital records shall maintain them in a secure and safe location and manner and develop a plan to ensure that these records will be protected from destruction, damage, or inadvertent disclosure to unauthorized persons in the event of a military or civil emergency or natural disaster.

G. RETENTION OF HISTORICAL RECORDS.

1. The following categories of records are considered to have historical archive value to the Grand Rapids Police Department and the City of Grand Rapids and shall not be destroyed without the approval of the Police Chief:
 - a. Photographs of sworn and civilian employees.
 - b. Photographs of Departmental activities.

H. CONFIDENTIAL RECORDS.

1. The following records shall be considered confidential records:
 - a. Records or information relating to sworn personnel and other individuals, disclosure of which would endanger their lives or safety.
 - b. Records of information relating to the safety or security of persons or property whether public or private, including but not limited to building, public works, and public water supply to the extent that those records relate to the ongoing security of the Grand Rapids Police Department or the City of Grand Rapids.
 - c. Records or information protected from disclosure by statute or privilege, including but not limited to, medical or educational recordings of any person and records or communications subject to attorney-client privilege.

- d. Records or information relating to any employee or other individual of a highly personal nature, disclosure or which would result in an unwarranted invasion of personal privacy.

I. LITIGATION HOLDS.

1. Upon receiving notice that litigation has commenced or is imminent, a records custodian shall take immediate action to ensure that all retained records relevant to the subject matter of the litigation, including any records that may reasonably lead to the discovery of relevant records, are retained and accessible for production and copying through the pendency of the litigation. Immediately upon receipt of such notice, the custodian shall cease destruction or disposal of any records still in existence that are relevant to or may reasonably lead to the discovery of relevant records.
2. For purposes of this section, a records custodian shall be responsible for implementing a litigation hold when informed by a city attorney that litigation has been commenced or is imminent or when informed that a department employee has been served with a summons and complaint.

J. DISPOSITION OF RECORDS.

1. Records custodians shall ensure that vital and confidential records are destroyed only by authorized personnel and in such a manner as to prevent inadvertent disclosure to unauthorized persons.
2. Other records may be destroyed or otherwise disposed in a manner approved by the Commander of the Support Services Division.