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| Records Management | | |



I. Policy Statements

- A. Division personnel shall maintain Division records in accordance with the approved Records Retention Schedule and shall not request or order destruction of any record without first obtaining authorization from the proper authority.
- B. Division personnel shall maintain and organize Division records and filing systems so that any public record may be made available **for copying or inspection** within a reasonable amount of time.
- C. Official Division records shall not be destroyed, transferred, or otherwise disposed of in violation of the current Records Retention Schedule. Any record which is the subject of a pending public record request shall not be destroyed or submitted for destruction. No record shall be destroyed if it pertains to any pending case, claim, or action.
- D. A log regarding the removal of Division personnel record files, in whole or in part, shall be securely maintained at the location where the file is normally kept. The log shall contain the date, time, and name of the person removing the file or file part; the name of the supervisor present during the review of the file or file part; the location of the file or file part; and the date and time of the return of the file or file part.
- E. Division Personnel Records Files
 1. All official records regarding current and past Division employees shall be maintained in one of the following files. The listed contents of these files are not all inclusive.

Note: For sworn personnel, refer to the retention timelines stipulated in the FOP Capital City Lodge No. 9 collective bargaining agreement (CBA).

a. Master Personnel File

- (1) Administrative: **Raises**, hire date, promotions, etc.
- (2) Discipline: **As appropriate and** in accordance with **the applicable CBA**
- (3) On-duty traffic crash investigations
- (4) Commendations: **Awards** and compliments
- (5) EARS packet(s), **performance evaluations, performance improvement plans, etc. in accordance with the applicable CBA**
- (6) Miscellaneous: **Officer assaults**, miscellaneous reports, etc.

b. Background Investigation File

- (1) Personal history questionnaire
- (2) Background investigation summaries
- (3) Pre-employment polygraph exam report

c. Division Training Files

- (1) Recruit class records
- (2) Miscellaneous training records
- (3) Driver training records
- (4) In-service training records
- (5) Vehicular pursuit training records
- (6) Documentation of attendance at outside seminars or schools
- (7) Firearms qualification records

d. Internal Affairs Bureau (IAB) File

- (1) Citizen complaints

Note: The Department of the Inspector General may maintain records of citizen complaints involving sworn personnel.

- (2) Uses of force, levels 2-8
- (3) Injuries to prisoners, including injuries prior to police contact
- (4) Investigative files resulting in disciplinary action
- (5) Internal investigations
- (6) Discharge of firearms
- (7) Stopping tactic investigations
- (8) Vehicular pursuit investigations
- (9) Strip searches
- (10) Forced entries

e. Payroll Records

- (1) Time sheets
- (2) Computerized payroll information

F. Access to Division Records and Files

1. Division personnel desiring to view their own personnel files shall forward an email or written request, in accordance with the applicable **CBA**, to the supervisor directly responsible for the maintenance of the files. For the master personnel file, the request shall be forwarded to the involved deputy chief **or a designee**. The review shall be conducted in the presence of the responsible supervisor **and a member of the Human Resources Personnel Office**.

2. **Public Records**

- a. Citizens or Division personnel desiring access to Division records other than their own or for official duties, as permitted by **public records laws**, shall be referred to the Public Records **Section**.

- (1) Bargaining unit requests for records shall be coordinated through the Discipline/Grievance Section for labor matters involving sworn personnel and through the Human Resources Manager for labor matters involving civilian personnel.*
- (2) Additional information about accessing public records, submitting a request, and related costs is available on the “Public Records Request” page of the Division’s public website.*
- b. Public Records Section personnel shall process public records requests in a reasonable amount of time and in the order received, except when an incident may generate a high level of public interest and in other unique circumstances determined by the Office of the Chief of Police.*
- c. Public Records Section personnel shall promptly respond to public records requests in accordance with Ohio Revised Code 149.43.*
 - (1) State and federal laws provide exceptions that require or permit a public office to withhold or redact information in certain records from public release.*
 - (2) There are no restrictions on the number of records made available to any individual; however, restrictions may be imposed on requests made for commercial purposes in accordance with state law.*
- d. Requesters may be assessed a charge for the actual cost of copying and supplying public records in accordance with state law.*
 - (1) For non-video records, “actual cost” shall consist of the cost of depleted supplies, records storage media costs, actual mailing and alternative delivery costs, or other transmitting costs, and any direct equipment operating and maintenance costs, including actual costs paid to private contractors for copying services.*
 - (2) For body-worn camera and other video records, “actual cost” shall consist of the costs incurred reviewing, blurring or otherwise obscuring, redacting, uploading, or producing the video records, including but not limited to, the storage medium on which the record is produced, staff time, and any other relevant overhead necessary to comply with the request.*
 - (a) For the purpose of calculating costs:*
 - i) The staff time expended shall be rounded downward to the nearest tenth of an hour.*

- ii) *The hourly rate for the actual, necessary, and direct charge for the staff time expended reviewing and redacting the requested video footage shall be rounded downward to the nearest dollar of the lowest paid employee's hourly rate in the office that processes video record requests. The cost shall be reevaluated each year.*
 - iii) *The maximum total charge shall not exceed \$750.*
- (b) *For a duplicate video record request in which the actual cost was already paid, the cost of the duplicate video record shall not exceed the staff time to produce the same record. The cost may be divided proportionally between requesters of the same record if the video is being processed when duplicate requests are received.*
- (c) *Public Records Section personnel shall invoice the requester for the estimated actual cost of the video footage by email or U.S. mail within five business days of receipt of the public records request and shall supply the video footage in a digital format. If payment is not received within 15 business days of sending the invoice to the requester, the request shall be closed without further action.*
- (d) *Additional costs shall not be assessed in the following circumstances:*
 - i) *In accordance with state law and subject to verification, the requester is a victim or the victim's representative or attorney.*
 - ii) *The requester is not provided the estimated actual cost within five business days.*
 - iii) *The actual cost exceeds the estimated actual cost already paid by the requester.*
- (e) *Public Records Section personnel shall request the City of Columbus to issue a refund by check to the name and mailing address provided by the requester when the actual cost is less than the estimated actual cost. Requesters who do not provide a name and mailing address will not receive a refund.*
- e. *Division personnel may respond to foreign agencies, City departments, and similar government entities requesting information applicable to their office unless otherwise prohibited by law or Division policy.*

3. Public Records **Section** personnel are not required to search for or locate records belonging to another unit. Personnel assigned to the unit possessing the records shall locate the requested records and provide them to the Public Records **Section** in a timely manner.

G. Records Retention and Destruction

1. Records shall be maintained according to the Records Retention Schedule on file with the Records Commission.
2. The Public Records **Section** shall maintain the current Records Retention Schedule and instructions for records storage and destruction on the Division's intranet **and public website. The current Records Retention Schedule shall be readily available to the public upon request.**
3. All units/bureaus shall conduct an annual review to determine which records are eligible for storage or destruction.
4. Division personnel shall ensure all records meet the following criteria prior to transferring them to the records warehouse for storage:
 - a. There is an applicable retention schedule for the records, or a letter requesting the implementation of a schedule has been submitted to the Public Records **Section**.
 - b. The need to access the records is limited.
 - c. The records are prepared for storage in accordance with the instructions listed on the Division's intranet under the "Public Records" link.
5. Records meeting the retention period specified in the Records Retention Schedule that are of no further administrative, legal, fiscal, or historic value to the Division may be destroyed. Records that are statutorily required to be destroyed shall be destroyed.
6. When destroying records identified within the Records Retention Schedule as "no RC-3 needed," the unit responsible for the records shall also be responsible for their destruction.
7. Records transferred to the records warehouse shall be presumed to be eligible for destruction upon the expiration of the retention period. Exceptions to this policy require the written authorization of a bureau commander/manager or above and shall include **the following information:**
 - a. The reason for the extension.
 - b. Name and assignment of the person requesting the extension.
 - c. The estimated extension period.

II. Procedures

A. Division Personnel

- 1. Refer citizens or Division personnel requesting access to Division records other than their own or for official duties to the Public Records Section. Requests may be submitted using any of the following methods:**

- a. In person**
- b. Online submission form available on the “Public Records Request” page of the Division’s public website (www.columbus.gov/police)**
- c. Public Records Request, form E-10.101, submitted in person, by email, U.S. mail, alternate delivery service, or fax**
- d. Any other written format to include a letter, fax, or email**
- e. Telephone: (614) 645-4925**

Note: While not prohibited, telephone requests should only be considered when other means are unavailable or impractical.

- 2. Advise the requester that additional information about accessing public records, submitting a request, and related costs is available on the “Public Records Request” page of the Division’s public website.**
- 3. Encourage the requester to provide a written request to include his or her name, mailing address, telephone number, and the reason for the request using any of the methods listed in Section II,A,1.**
 - a. Advise that neither a written request nor the reason are required; however, both are helpful for processing the request.**
 - b. Offer a copy of the Public Records Request form available through the “Online Forms” link on the Division’s intranet and provide assistance in submitting a request to the Public Records Section when needed.**
 - c. If the requester declines to provide a written request or when otherwise impractical, send an email to PublicRecords@columbuspolice.org with the date of contact; requester’s name, mailing address, and telephone number (if provided); reason for the request (if provided); and any additional information available.**

B. Public Records Section Personnel

- 1. Pick up records for storage as requested.**
- 2. Prior to taking control of records prepared for storage, ensure the records meet the established guidelines. Do not accept records unless they meet established guidelines.**

3. Conduct an annual review to determine which stored records are eligible for destruction.
4. Schedule the destruction of records as needed. Complete and submit the RC-3s:
 - a. Through the Public Records **Section** chain of command to the Support Services Subdivision Deputy Chief.
 - b. To the designated City and State agencies.
5. Destroy records in accordance with established procedures.
6. Maintain documentation of records destruction.
7. Maintain updated instructions on the Division intranet for Division personnel regarding records storage and destruction.
8. ***Process public records requests in accordance with the Public Records Bureau SOP.***