

**Records Management: Records Retention and Disposition Policy**  
Saint Anselm College

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## 1.0 AIM AND SCOPE

The historical record of Saint Anselm College is affected by how we, as an institution, create and manage the records we receive and use on a daily basis. The decisions related to how we maintain and discard our records are, in many cases, bound by state and federal laws and are crucial to our good standing. They also have a lasting impact on our institutional memory and the continuance of our mission.

The Records Retention and Disposition Policy will serve as a framework for the college's records retention and disposition program. The policy will:

- define what constitutes an official college record and how the policy will be applied at Saint Anselm College;
- outline records retention and disposition requirements in order to meet statutory obligations, audit requirements, and relevant standards and codes of practice;
- provide an overview of the recordkeeping responsibilities of college employees; and
- discuss the role and responsibilities of the College Archives in administering the records management program.

This policy is intended for Saint Anselm College employees—administration, faculty, and staff—who create, receive, and use college records.

## 2.0 DEFINITIONS

### 2.1 Record

An official college record is any recorded information (regardless of format) created or received by a college employee that is evidence of job functions/activities and has value for a specified period of time. It is the content, or information, of a type of record (letter, email message, meeting minutes, etc.) that determines a record's status rather than the format (paper, booklet, email, photographs, etc.). Some examples of records include:

- Meeting minutes;
- General ledgers;
- Credit card receipts;
- College policy documents;
- Non-Academic disciplinary records; and
- Email messages.<sup>1</sup>

This policy applies to all documents appraised as records.

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<sup>1</sup> For the most part, electronic records such as email messages shall not be treated any different than paper records. For example, email is a system of delivering electronic messages, but not a record. An email message, however, sent by an employee that provides evidence of business activities (e.g., donor correspondence) is a record and should be managed the same manner as if it was in paper format.

## **2.2 Non-Record**

A non-record is material that does not support an employee's direct job functions/activities. Many times non-records are retained for a variety of reasons, including:

- Convenience or Reference Purposes. These materials may include copies, duplicates, or publications that an office receives but does not create and are kept for reference purposes.
- Non-College Related Purposes. An example can be personal correspondence (paper or electronic) not consistent with a college employee's job functions/activities.

After it is no longer useful, a non-record should be discarded. Any non-records that are created or received shall be disposed of in a manner that respects the confidential or sensitive information they may possess. See Section 3.2.1 for information on records destruction.

Non-records are not covered by this policy.

## **3.0 POLICY**

Saint Anselm College creates, manages, and uses a wide variety of records to conduct business and support its educational mission. As an institution of higher education, Saint Anselm College is committed to meeting its administrative, legal, fiscal, and historical obligations by systematically managing records created in the course of the college's academic and administrative operations.

Records are the natural product of conducting college business. As such, records must be maintained and disposed of in a manner that supports the college's mission and meets local, state, and federal recordkeeping requirements. All college employees who generate, as part of their job functions/activities, records (regardless of format) have a responsibility to retain and dispose of those records in an appropriate manner.

The purpose of this records policy is to address the proper identification, retention, and disposition of college records created or received as a part of official college business. To this end, the College Archives provides Saint Anselm College with a records management program that will:

- Comply with laws and regulations, and business best practices;
- Identify, appraise, locate, and manage college records and information resources throughout their life cycle;
- Maintain consistent recordkeeping practices; and
- Provide advice on filing systems and file naming standards.

Records retention and disposition standards and systems developed at the college must ensure that transactions and related authorizations are fully supported in the event of audit, litigation, or other external action.

### **3.1 Records Retention**

An inherent risk is present when managing organizational records. Regardless of what they document, records should be retained only for as long as they are needed. In cases of audits or litigation, keeping certain records for too long can prove to be as equally damaging to an institution as keeping records for too short of time. This risk can be mitigated through records retention and disposition schedules (hereafter referred to as ‘records schedules’) of a records management program.

A records schedule is a document that describes a records series,<sup>2</sup> addresses how long records shall be maintained by an office, and outlines the disposition method after records are no longer in active or semi-active use by an office. All records have fixed retention periods that are addressed in the records schedule.<sup>3</sup> These schedules also discuss employees’ responsibility for maintaining and disposing of records.

Records schedules provide the authority for retention and disposition and will be developed with guidance from the college’s administration. Once the records of an office have been inventoried through a records survey, records schedules are created. The Archivist will assist any office that needs to prepare records schedules. All college records will be controlled by records schedules.

At a minimum, records will be retained in accordance with local, state, and federal guidelines and consistent with sound business practices. In cases of pending, anticipated, or threatened litigation, an office’s normal records retention and disposition schedules need to be temporarily suspended and records shall be retained at a minimum until final resolution of the action.

### **3.2 Records Disposition**

According to a records schedule, records that are no longer in active use can be disposed of in one of two ways: destruction or transfer to the Archives.

#### **3.2.1 Destruction**

Records containing sensitive or confidential information<sup>4</sup> and are not scheduled for permanent preservation (i.e., transfer to the Archives) must be rendered undiscoverable depending on the record format: either paper or electronic.

##### **3.2.1.1 Paper documents**

Paper records can be destroyed through one of two methods: confidential destruction or recycling. Confidential destruction must involve documents being shredded either on-site or through a trusted shredding service.

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<sup>2</sup> A records series is a group of records filed as a unit (e.g., business correspondence, meeting minutes, annual reports, etc.).

<sup>3</sup> Retention times can vary between three years and permanent preservation.

<sup>4</sup> Examples of sensitive or confidential information include credit card numbers, personal identifiers, personal financial information, social security numbers, and student academic information.

The other method of disposal for paper documents is through recycling. This method can only be employed if the paper documents do not contain confidential and/or sensitive information.

### **3.2.1.2 *Electronically stored data***

The safeguards to protect covered data and information are discussed in the Saint Anselm College Information Security Program policy. There are methods, however, to ensure that electronically stored data and information cannot be compromised in the destruction process. These methods include erasing or destroying the data through electronic and/or physical methods.

### **3.2.2 *Transfer to the Archives***

All records that have outlived their primary value to offices and have been appraised for permanent preservation (by a records schedule) must be transferred to the Archives. These inactive records will be accessioned into archival collections for permanent storage. Access to archival records will depend upon the existence of any access provisions in local, state, or federal regulations, in addition to business best practices that have been addressed in the records schedules.

## **4.0 CONFIDENTIAL RECORDS**

Many college records and information resources contain confidential or sensitive information that must be safeguarded and appropriately disposed of in order to protect individual privacy. Many of these records are protected by local, state, and federal laws and regulations, including, but not limited to, the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPPA). All college employees must understand their recordkeeping responsibilities, especially in terms of managing confidential records.

Whether retained in college offices or in the Archives, confidential records will not be accessed by any unauthorized persons. Access privileges will be clearly defined in the records schedules.

## **5.0 BENEFITS TO THE COLLEGE**

This records policy is one piece of a successful records management program. A records management program focused on providing solutions for managing college records has a variety of benefits, including:

- Greater assurance of legal compliance to minimize liability and discovery impacts;
- Improved staff productivity with effective records management systems;
- Reduced office storage issues through elimination of unnecessary and duplicate documents;
- Ensured safety of vital records; and
- Increased likelihood of the preservation of important documentation on the college's history.

## **6.0 RESPONSIBILITIES OF MANAGING COLLEGE RECORDS**

The role of the Saint Anselm College Archives is to protect institutional records and information resources throughout their life cycle. This includes complying with state and federal laws and regulations, identifying vital records, and implementing strategies for preserving information and records of long-term value in any format.

The College Archives administers a complete records and information management program for the college, which includes preservation and records management activities. Preserving college records that document the history of the college begins with an effective records management strategy. Records management is the systematic control of all college records, regardless of format, from their creation or receipt, through their processing, distribution, organization, storage, and retrieval to their disposition.

### **6.1 College Archivist as Records Manager**

All college records management activities are administered by the College Archivist. As records manager for the college, the Archivist shall have the right of reasonable access to, and examination of, all college records. The Archivist's responsibilities include:

- Surveying office's records and recordkeeping practices;
- Drafting records retention schedules;
- Assisting the college's administration with issues of records and recordkeeping;
- Advising offices on questions of records retention and disposition; and
- Offering training and guidance in records management, including classification and file management, and the management of electronic records.

### **6.2 Records Liaisons**

Recognizing that records creators are an important part of any successful records management program, the College Archivist will work with office's in creating retention and disposition schedules for records in their charge. From each office, a Records Liaison should be appointed to serve as the point of contact with the Archivist on records management issues. A proactive approach to records appraisal—by engaging records creators to assist in managing records—will generate fewer, but stronger records for the Archives of tomorrow. This pre-archival control will result in a more refined historical record of the college.

## **7.0 CONTINUING EVALUATION AND ADJUSTMENT**

This policy will be subject to periodic review and adjustment by the college's administration and the College Archivist.

## 8.0 SOURCES

### ***Related College Policies***

Office of Information Technology, Saint Anselm College. *Saint Anselm College Information Security Program*. Rev. March 1, 2004. Accessed 26 May 2009. Saint Anselm College Intranet.

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