

1.c Records Management Policy

Responsible Office	Information Technology		
Created	11/1/2011		
Revised	11/06/2019; 1/13/2021		
Effective	11/1/2011		
Compliance	NWCCU 2.C.4, 2.I.1, and ER 15		
Classification	<input checked="" type="checkbox"/> Institutional	<input type="checkbox"/> Board of Directors	<input type="checkbox"/> Local unit(s):
Approving Body	<input checked="" type="checkbox"/> President's Council	<input type="checkbox"/> Board of Directors	<input type="checkbox"/> Unit VP

Policy

This policy outlines requirements for retaining, securing, and destroying University records. It shall be carried out in conformity with state and federal law. This policy covers all records which must be maintained to meet the fiscal, legal, historical, or administrative needs of Heritage University, or any records that contain confidential or restricted data.

Storage of Active Records

All active records must be maintained in a secure and reliable manner and be readily available for authorized use. Data security measures will be implemented commensurate with data value, sensitivity, and risk. Each Custodial Office shall ensure that any copies of records are handled with care to maintain the best interests of the University.

Retention Schedules

Each Custodial Office is responsible for determining the appropriate retention period for covered records for which it is the primary producer or holder of that information.

Storage of Inactive Records

As records become inactive all additional copies should be collected and destroyed. Each custodial office will keep records per requirements established by state and federal regulations. Records should be clearly marked with the retention expiration date.

Permanent Storage – Archives

Any record determined to have historical value by the President's Office will be stored permanently in the University Archives.

Destruction of Records

Each Custodial Office is responsible for the appropriate and timely destruction of records per their retention/destruction schedule. Destruction must be thorough and irreversible. Document destruction must be suspended immediately upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Definitions

Records: All documentation, email, data, regardless of physical form, generated while conducting business, which must be maintained to meet the fiscal, legal, historical or administrative needs of the organization.

Custodial Office: The office or department that originated and/or has been charged with maintaining and managing the record.

Active/Inactive Records: Active records are those kept on hand for regular use in conducting business. They should be arranged according to the needs and convenience of those who use them, but must be secured if they contain confidential or restricted data. The inactive phase of a record begins at the conclusion of an ongoing matter, such as completion of a contract or the departure of an employee.

Record Retention Schedule: A schedule details the current record retention practices of each Custodial Office that manages records covered by this policy. In many cases, schedules reflect the current legal requirement for retention of those records. The schedule takes effect as soon a record becomes Inactive. Offices that have copies of documents that are the responsibility of another office need to adhere to the retention and destruction schedule of the Custodial Office. Retention schedules are appended to the end of this policy.

Data Classifications: To ensure the security of and appropriate access to sensitive data, records are managed according to the classification of the data they contain--Confidential, Restricted or Public.

- Regulated/Confidential - Data which is legally regulated; and data that would provide access to regulated/restricted information. Records containing this data must be stored in a secure location with limited access. These records must be destroyed according to their retention/destruction schedule by cross-cut shredding or other University sanctioned means to ensure that all sensitive information can no longer be read or interpreted.
- Restricted/Limited - Data which while not legally protected could be misused to the detriment of the University, its students, faculty, staff, partners, alumni or other third parties; and data protected by contractual obligations.
- Public - Data for which there is no expectation of privacy or confidentiality.

Related Documents

[Email Retention](#)