

BELOIT COLLEGE

Policy: **Record Retention and Destruction Policy**
Effective: April 7, 2014
Source: VFPF
Purpose: The purpose of this Policy is to ensure that necessary records and documents of Beloit College are adequately protected, maintained and are destroyed when appropriate in a secure manner.

1) Policy

This represents Beloit College's policy regarding the retention and disposal of electronic and paper documents.

2) Administration

In order to comply with various federal and state regulations, many of the College's records must be kept for specified periods of time. In addition, accomplishing the work of the College may, in some instances, require that records be retained longer than the minimum required by statute. Consistency in handling such records is important and departmental procedures should be established and adhered to. Once the records have served their purpose and the regulatory requirements have been satisfied, these materials should be disposed of in an appropriate manner. Records containing personal or confidential information must be destroyed by shredding or otherwise permanently removing the information. Destruction of records in a manner inconsistent with the College or departmental policy can result in a liability for the institution and possibly for the individual.

3) Suspension of Record Disposal In Event of Litigation or Claims

In the event the College is served with a subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning the College or the commencement of any litigation, such employee shall inform their immediate supervisor and any further disposal of documents shall be suspended. Any notification requires consultation with Vice President for Human Resources and Operations. The VPHROP will decide proper action including consultation with legal counsel, if needed. The supervisor shall take such steps as necessary to promptly inform all staff of any suspension in the further disposal of documents.

4) Procedures

Because the College does not have a centralized record management function, each department is responsible for the retention and disposal of the records it generates or receives. Every department shall designate a person to coordinate a records retention process for that office.

The department coordinator shall review the records maintained by that office and submit a Record Retention Schedule to the Vice President for Finance's Office by May 15, 2014. The Vice President for Finance's Office reserves the right to review and set minimum standards for the retention of financial records that may be held in other departments.

Each subsequent year, the department coordinators shall review the Record Retention Schedule. If changes are needed, forward an amended Schedule to the Accounting Office. If there are no changes required in the Record Retention Schedule, the coordinator shall forward a letter to the Accounting Office certifying such.

Destruction includes:

- **Recycling** - generally appropriate for all non-confidential paper documents, including public documents of other organizations, magazines, annual reports, newsletters, announcements, and drafts or policies or other memos which are not confidential.
- **Shredding** - using a cross-cut or strip shredder for all documents that should not be read by others after they are no longer needed or that contain personnel or confidential information. This is essential for any document containing personal information, information that is student protected information under FERPA, health related information, or financial information.

This Policy applies to all records generated in the course of the College's operation, including original and reproductions of paper and electronic records, listed below:

- Financial and Tax Records
- Personnel and Gift Records
- Employment Records
- Faculty Records and Files
- Student Records
- Alumni Records
- Building and Facilities Records
- Compliance Records and Environmental Laws
- Campus Crime Reports
- E-Mail and Other Computerized Data
- Litigation Files