

Title: Records Management

Policy ADM 1.70

Date: 9/27/10

Areas Affected: Academic and Administrative Records

PURPOSE AND SCOPE

The purpose of this policy is to ensure the integrity, confidentiality, and security of all documents and records created, received or maintained in the course of institutional business, protect the interests of faculty, employees, students of the Bon Secours Memorial College of Nursing ("the College"), facilitate appropriate access to such documents, and records, and inform all faculty, employees and administrators of the College of the standards, requirements, and responsibilities for the management, retention and disposition of all records of the College.

RECORDS DEFINED

The term "record" under this policy means all documents and records, whether written, electronic or recorded matter regardless of its physical form or characteristics, that are created, produced, received or maintained by faculty, employees or components of the College during their activities for or on behalf of the College or in the transaction of College business. Records may also include documents that were acquired by the College as the result of a business acquisition or by written agreement to serve as custodian. Examples include, but are not limited to, academic files, administrative files, student files, financial and accounting records, correspondence, letters, memoranda, forms, charts, reports, maps and drawings, plans, photographs and films, spreadsheets, computer records, microfilm and microfiche, electronic files, electronic mail, data processing output in media, video and audio recordings, and micrographics or any digitization magnetic tape or other electronic storage of any of these things. This policy does not apply to non-records which include preliminary drafts not circulated for comment, duplicate copies of correspondence, duplicate copies of records used for short-term reference purposes, blank forms, stocks of publications, magazines, publications from professional organizations, newspapers, public telephone directories, electronic mail ("e-mail) created during incidental use and transitory messages such as voice mail, telephone messages, self-sticking notes and other messages which are used primarily for the informal communication of information.

Active records are defined as information that is regularly accessed while students are enrolled.

Inactive records are those which are rarely accessed and, if not electronic, may be stored at a secured off-site storage. Records custodians should retain detailed storage information of documents stored offsite in order to retrieve them on demand or at the end of the 'retention period, at which time the custodian is responsible for disposal of those specific records.

Reference Policy # _____

Approved by:

Signature

Title

Date

Approval History:

Committees and Dates:

Faculty Forum – _____

Faculty Organization - _____

Key words: _Records Retention

POLICY

It is the policy of the College that all records (as defined above) are the property of the College and neither the personal property nor the property of a specific school, department, division, unit, institute or center, that such records are maintained in accordance with all applicable laws and regulations, the requirements of accrediting and other external agencies, and the standards and procedure prescribed herein, and that records that are no longer needed or of no value are discarded or disposed of as specified in this policy.

RESPONSIBILITIES

All College personnel are responsible for ensuring that all records and created, used, maintained, preserved, and disposed of in accordance with this policy. Electronic records are to be managed consistent with the requirements for traditional records in compliance with this policy. Records containing confidential and proprietary information shall be securely maintained, controlled, and protected to prevent unauthorized access. The unauthorized use, removal, or destruction of College records is prohibited. No College record or document may be falsified or inappropriately altered in any manner. Information pertaining to the unauthorized use, removal, or destruction of the College's records or regarding falsifying or inappropriately altering information in a College record should be reported either directly to the Provost of the College.

All College records shall be retained in a readable format regardless of changes in technology or equipment obsolescence. Printing documents and saving to a file, maintaining old equipment and software applications, or converting records to new technology, may meet this requirement. Electronic mail ("e-mail"), i.e., is subject to this policy. E-mail senders (originators) are responsible for retaining messages and documents relating to the transaction of College business in compliance with the attached Records Management Schedule. E-mails may be retained in electronic form or printed.

Each functional area of the College shall have a designated records custodian responsible for implementing records management practices consistent with this policy, establishing and monitoring the level of confidentiality and security appropriate for specific types of records, educating staff in understanding records management practices, preserving records of legal, fiscal, or administrative value, and destroying inactive records upon expiration of the application retention period. Custodians are responsible for reviewing Records Management Schedule annually and the informing the College's administration of any necessary changes.

RECORD DISPOSAL

Records that have satisfied their legal, fiscal, administrative, and archival requirements are to be disposed of or destroyed in accordance with the Records Management Schedule (see Appendix). Records must be destroyed in a manner that ensures the confidentiality of the records and renders the information no longer readable and recognizable as College records prior to disposal. The approved methods to dispose records include, but are not limited to, recycling, shredding, burning, pulping, pulverizing, and magnetizing. Written documentation of such disposal shall be kept and maintained by the designated records custodian. Deletion of confidential or privacy-protected information in computer files or other electronic storage media is not acceptable. Electronic records must be "wiped" clean or the storage media physically destroyed by or under the direction of Bon Secours Information Services (or by its designee). These methods of destruction are specified so that records may not be viewed or used by unauthorized persons after they are disposed.

LITIGATION HOLDS

Where the College has information regarding current, pending, threatened litigation or governmental investigation, it has the obligation to take steps to preserve documents that might be implicated in such litigation or investigation. In such event, the College is under legal obligation to preserve all relevant records pertaining to the issues and will take steps to identify all paper and digitally maintained files (including e-mail and computer accounts of separated employees) that may contain information relevant to the case. The College's Provost will notify appropriate personnel to preserve such documents indefinitely until receiving a written release by the Provost. In the event of a litigation hold, all policies for the disposition of documents must be suspended for the subject of the hold. Failure to preserve documents after having received a preservation notice can have extremely serious consequences for the College. This hold includes the preservation of electronic media and obligates the College to copy and preserve emails and computer hard-drives of involved personnel for future forensic investigation. Accordingly, failure to comply with a litigation hold will be deemed misconduct and will subject personnel to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

American Association of Collegiate Registrars and Admissions Officers (2010). AACRAO's Retention of Records: Guide for Retention and Disposal of Student Records. Washington, DC: AACRAO.

U. S. Department of Education (2011). Record Keeping Electronic Processes & Privacy: Federal Student Aid Student Financial Aid Handbook. Washington, DC: U.S. Department of Education.