Lawrence University Records Management Policy

I: Introduction and Purpose
Records created in the course of Lawrence University’s academic and administrative operations serve to support current administrative needs, meet legal requirements, and provide a rich source for historical research. Because the University does not have a centralized records management office, each unit (office or department) is responsible for the retention, disposal, and transfer of the records it generates.

The purpose of this document is to:
- establish a records management policy for Lawrence University;
- define key concepts specific to the policy; and
- describe a framework for implementing this policy through a records management program.

II: Policy Statement
Lawrence University is committed to meeting its administrative, fiscal, and legal obligations by systematically managing the records created in the course of the University’s academic and administrative operations. The management of records includes appropriate practices for creating and organizing those records, effective retention of those records determined to have permanent or enduring value, and proper destruction of those records determined to have no permanent or enduring value once operational needs and legal requirements have been met.

This policy and relevant materials developed as part of the records management program, including procedural guidelines, will be made available to members of the Lawrence University community for their ongoing reference.

III: Scope
This policy applies to all records created at Lawrence University during the course of its educational and other activities. Records created by employees of Lawrence University (staff and faculty) in the normal course of business are the property of Lawrence University. For faculty, these include records that are created or received in the conduct of student advising, grading, committee work, or program or department administration. Records that faculty members create or receive in the conduct of their teaching, research, or professional activities are not University records and are therefore excluded from this policy.

IV: Definitions
Records are generally defined as information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business. In the University context, records consist of recorded information that is created or received by University employees in the course of performing official functions on behalf of the University. Records are defined by content rather than by format and thus include those that are paper, analog, electronic, or any other format from which information can be retrieved. Records include, but are not limited to, official University publications (including
web pages), fiscal data, correspondence (including email), minutes of meetings, reports, academic records, and employee files.

**Active records** are those that are frequently referred to or that are needed to support the current business activity of a unit.

**Inactive records** are records that have not been needed for at least one year or for which the active period has passed. Inactive records should be securely stored until the end of the designated retention period. Unless these records have been defined as permanent records they should be destroyed after the designated retention period has elapsed.

**Permanent records (or archival records)** are those which have enduring historical, administrative, or research value to the University and which the University retains indefinitely.

**Retention schedules** are documents describing types of records, providing a length of time they should be kept, and including instructions for disposition. State or federal law, professional best practices, or operational needs may determine the period that certain records must be kept.

**V: Responsibilities**

The University Archives serves as the steward of University records of enduring value, in any form, that are entrusted to its care. As such, it has the duty and authority to collect, appraise, describe, preserve, and make available University records of enduring value in compliance with appropriate laws and regulations and approved retention schedules. In addition to carrying out these duties, the University Archivist is responsible for advising on and providing assistance in the management of the University’s records through ongoing discussions concerning the creation and security of records, the creation of records retention schedules, and training opportunities for Lawrence University employees.

The Records Management Advisory Group is responsible for developing further institutional records management policies and proposing changes to such policies as needed, advising the University Archivist on the development and implementation of records management procedures, reviewing the performance of the policies and procedures, reviewing and approving records retention schedules, and promoting the records management program on campus.

Each unit is responsible for managing its records from creation to disposition. With approval from Technology Services, units may contract with commercial vendors for records storage, imaging, and destruction services; however, they remain ultimately responsible for the proper management of their records. Each unit must appoint at least one Records Coordinator, as appropriate, to be responsible for: understanding the records created within the unit, where those records reside, and on what storage medium; ensuring that all employees in the unit are aware of the records management policy and follow it; consulting the University Archivist on matters related to retention and disposition of records and, if necessary, assisting in the development of an internal records retention schedule for the records of the unit; establishing the level of confidentiality and security appropriate to specific types of records and helping the unit maintain and monitor confidentiality and security, and assisting in the preservation and retrieval of records of the unit subject to a litigation hold.

All employees of Lawrence University are responsible for managing and maintaining the records they create in compliance with this policy and the records management program developed by the University.
VI: General Procedures

Records Creation
All University units must create records that accurately document their core functions and activities.

Records Retention and Storage
The University Archivist, in consultation with the Records Management Advisory Group and legal counsel, will work with University units to develop records retention schedules according to federal and state laws and regulations, professional best practices, and operational needs. A General Records Retention Schedule will provide guidance for records commonly created across the University; this will be supplemented by approved unit-specific schedules as necessary.

All units must store their records in a safe, stable, and secure manner that supports their timely, accurate and cost-effective retrieval and applies appropriate controls on their accessibility.

Records Disposition
All units must destroy University records scheduled for destruction in accordance with the appropriate records retention schedules. This will often necessitate confidential destruction, through shredding or deletion. All units must maintain documentation of records destroyed in accordance with retention schedules.

Litigation Hold
Circumstances may arise that require the immediate suspension of document disposal routines and activities and require the preservation of records beyond these time periods set forth in University record retention schedules. The Vice President of Business and Operations should be notified immediately of all service of legal process or of any new, threatened or potential litigation matters or government investigations, audits or proceedings so that a litigation hold analysis may be conducted. In the event of a litigation hold, the University will take steps to identify all paper and digitally maintained files that may contain documents relevant to the case, including emails, and will notify members of the University community to preserve such documents indefinitely. The directives in a litigation hold supersede all other University or unit-specific retention and disposal guidance.

Transfer to Archives
All records transferred to the Lawrence University Archives for permanent retention will undergo the archival appraisal process and will be processed and described according to current archival standards. All University records will be open to researchers on a non-discriminatory basis in the absence of any restrictions. University records may be restricted only after consultation with the University Archivist or in accordance with legal restrictions, and only for a specific and reasonable period of time.

VII: Related University Policies
Confidentiality of Records (HR Policy #5-2.07)
Computer Use (HR Policy #5-2.02)

Approved by the Audit Committee of the Board of Trustees, May 18, 2012