

RECORDS MANAGEMENT POLICY

Haverford College is committed to meeting its administrative, fiscal, legal, and historical obligations through the systematic and consistent management of all records, regardless of medium or format, created and/or maintained by employees of Haverford College in the course of the College's academic and administrative business functions.

The effective management of the College's records will:

- meet legal standards for protection, storage, accessibility, and disposition;
- protect the privacy of students, faculty, and staff as required by law;
- ensure optimal and efficient usage of space and other resources;
- improve efficiency and access to information;
- promote a culture of clarity, accountability, and transparency;
- contribute to the documentation of the College's historical records; and
- support the effective governance and management of the College.

PURPOSE

The Haverford College Records Management Policy provides guidelines for properly establishing a records management program and aids the College and its individual departments and offices in effectively and efficiently designating, maintaining, and disposing of institutional records.

Haverford College has adopted the international standard ISO 15489: ISO 15489, Information and documentation – Records management, as the guiding framework for this policy.

The purpose of the Records Management Policy is:

- to preserve Haverford College history;
- to define terms relevant to records management;
- to establish accountability for records management and retention;
- to operate in conjunction with other College policies and programs relating to the generation or maintenance of records;
- to protect confidentiality and strengthen safeguards against the inadvertent disclosure of confidential records;
- to establish the length of time certain categories of records are required to be maintained and stored;
- to establish the time at which certain categories of records should be destroyed, absent exceptional circumstances;
- to establish appropriate records destruction practices; and
- to comply with all applicable laws and best practices with regard to the records it maintains, and to apply those laws and practices consistently across College offices and departments.

SCOPE

Records are defined by their content, not their format. This policy applies to all College records in all formats, including but not limited to paper records, electronic records, microform, or other media.

This policy applies to all College departments, offices, and employees responsible for creation/receipt, maintenance, storage, use, destruction, or preservation of college records in any format.

OVERSIGHT & RESPONSIBILITY

Oversight of the records management program is the responsibility of the Libraries for the Office of the Provost and the Office of Finance and Administration. The College Archivist & Records Manager is the ex-officio representative of the Libraries (which reports to the Provost). The incumbent will work closely with the designee of the Vice President for Finance and Administration in administering a campus-wide records management program.

COLLEGE ARCHIVIST & RECORDS MANAGER

The College Archivist & Records Manager is responsible to the College for the orderly retention and disposition of all records and oversees College-wide implementation of this policy. The College Archivist & Records Manager will promote and ensure that records are managed, retained, and safeguarded in accordance with the College's policies and procedures. Haverford College requires responsible handling of college records to ensure compliance with legal and financial requirements, to meet administrative needs, and to preserve permanently valuable records.

COLLEGE ARCHIVES

The College Archives serves as the repository of college records of enduring value, in any form, that are entrusted to its care. As such, the College Archives has the duty and authority to collect, appraise, describe, preserve, and make available college records of enduring value in compliance with appropriate laws and regulations, approved retention schedules and college policies.

A records management program is a common counterpart to academic and corporate archives. Records management and archives operate symbiotically and together offer a toolkit to manage an institution's records. The similarities can best be understood within the context of the Records Lifecycle model. The lifecycle of a record generally includes five stages: creation, active use, semi-active use, inactive use, and final disposition. Careful management of records ensure that institutional needs are met in a responsible and legal manner and permit the transfer of records of historical and enduring value to the Archives at the conclusion of the retention period.

RECORDS MANAGEMENT ADVISORY GROUP (RMAG)

The Records Management Advisory Group (RMAG) is a broadly representative body tasked by the Library (as representative of the Office of the Provost) and the Office of Finance and Administration to advise, assist, and support the development and maintenance of a

comprehensive records management program at Haverford College. The Records Management Advisory Group is comprised of the College Archivist & Records Manager, the Librarian of the College, and one or more persons appointed by the Office of the President and each member of Senior Staff as to provide substantive input into the development of policies, procedures, and protocols related to the management of records and other information resources.

DEPARTMENTS/OFFICES & EMPLOYEES

The primary responsibility for managing the College's records rests within each department/office. Each department/office shall establish a Records Custodian to work closely with the College Archivist & Records Manager. The staff or faculty member in charge of department records, or the staff or faculty member in charge of the records of official committees, is responsible for consulting with the College Archivist & Records Manager to determine proper storage and disposition of their college records in compliance with appropriate laws, regulations, and records schedules.

All employees are responsible and accountable for keeping accurate and complete records of their activities. All employees of Haverford College are responsible for managing and maintaining the records they create and administer in compliance with both this policy and records management procedures developed by the College Archivist & Records Manager. Employees may seek guidance from their department's Records Custodians or the College Archivist & Records Manager.

SAFEGUARD AGAINST UNAUTHORIZED OR ACCIDENTAL DISCLOSURE

Many college records contain confidential information which is protected by college policies and procedures, as well as state and federal laws and regulations including but not limited to the Family Educational Rights and Privacy Act ("FERPA"), the Health Insurance Portability and Accountability Act ("HIPAA"), the Gramm-Leach-Bliley Act, and the Fair and Accurate Credit Transactions Act of 2003. This policy shall be implemented in a manner consistent with all such policies, procedures, laws and regulations, as those may be amended from time to time.

Each department/office of the College must implement practices that protect confidential information contained in college records in accordance with relevant laws and college policies. Such protections must be applied throughout a record's lifecycle. Departments/offices are accountable for ensuring that employees, and others, are only granted access to confidential records essential to the performance of their duties. Further, each department/office must ensure that those granted access are trained and employ reasonable safeguards to protect the confidential records.

LIFECYCLE MANAGEMENT OF COLLEGE RECORDS

An integrated lifecycle approach denotes a consistent and coherent set of seamless management processes from the moment of creation or receipt of records, through classification, retention scheduling, storage, use, and destruction of records or the long-term preservation of records of

enduring historical value. The integrated records management lifecycle model requires enterprise governance, shared accountability, and a commitment to records stewardship in order to ensure sustainability of these critical management activities.

RECORDS CREATION/RECEIPT

All departments and offices are responsible for creating college records that accurately document their core activities. They are also responsible for properly handling records received from other College departments or from outside parties. To do this managers and employees should:

- determine what records they need to create/receive and use to conduct their business;
- determine which employees have the responsibility and authority to create and use departmental records;
- incorporate departmental records creation activities and responsibilities into departmental policies and procedures and provide periodic training on good recordkeeping practices;
- periodically review departmental records creation/receipt and filing procedures;
- to the extent possible, limit creation of records with Personal Information; and
- protect college records at all times from inadvertent loss or damage and from access by unauthorized persons.

RECORD USE AND STORAGE

The responsible office will store active records that are accessed on a regular basis and need to be retrieved quickly.

All departments and offices are responsible to maintain their active, semi-active, and inactive records in a safe, stable, and secure manner that supports their timely and accurate retrieval with appropriate controls on their accessibility. Storage will be determined by each Records Custodian after review with the College Archivist & Records Manager. Consideration should be given to confidentiality, space limitations, and the physical safety of the records and buildings.

RECORDS RETENTION

All college records must be maintained in accordance with the records retention schedule and this policy. The records retention schedule identifies:

- which office or department holds the official copy of record;
- how long such records are to be kept; and
- the ultimate disposition of these records.

DUPLICATE RECORDS

The responsible office may retain a record beyond the required retention period if good cause exists for doing so. In that situation, the responsible office will ensure that the record is destroyed in accordance with this policy once the need for its extended retention ends.

Departments/offices that are not designated to maintain the official copy of record are expected to only retain copies and drafts of such records to the extent necessary to conduct college business. The College Archives will not accept significantly duplicated material. Departments/offices are responsible to properly dispose of duplicate records once they are no longer necessary to the operation of the office maintaining the duplicate record unless subject to a litigation hold.

EXTENDED RETENTION PERIOD

The responsible office may retain a record beyond the required retention period if good cause exists for doing so. In that situation, the responsible office will ensure that the record is destroyed in accordance with this policy once the need for its extended retention ends.

LITIGATION/HOLD DIRECTIVES

When litigation involving the College, or its employees is filed or threatened, the law imposes a duty upon the College to preserve all records that pertain to the issues involved. Once aware that litigation exists or is likely to be commenced, the College's attorneys or the Vice President for Finance and Administration will issue a litigation hold directive to appropriate personnel. The litigation hold directive overrides the records retention schedule to the extent it may have otherwise called for the destruction of records covered by the hold directive until the hold has been lifted by the College's attorneys or the Vice President for Finance and Administration. The suspension applies equally to paper and electronic records, including duplicate records. No college employee who has been notified of a litigation hold may alter or destroy a record that falls within the scope of that directive.

Any college employee who becomes aware of litigation or threatened litigation prior to receiving a litigation hold directive shall inform the Vice President for Finance and Administration and the Provost immediately and shall suspend the records retention schedule, especially archiving or destruction until either (a) a litigation hold directive, defining the scope of the suspension, is issued by the College's attorneys, or (b) the employee receives confirmation from the Vice President for Finance and Administration that no litigation hold directive will be issued.

DISPOSITION

RECORDS TRANSFER

In preserving the documentary heritage of Haverford College, the College Archivist & Records Manager has a vital role: to help determine what college records (paper and electronic) will be preserved to document the history of Haverford and its faculty, staff, and students. Some records created by Haverford College have enduring historical value and should be transferred to the College Archives once they have served their useful life as dictated by the records retention schedules. These records should only be transferred to the College Archives once they are past their period of active use. Office and departmental records that have been transferred to the College Archives cannot be recalled and are subject to the same terms of use and reproduction as other collections stewarded by Haverford College Quaker & Special Collections.

If the records retention schedule indicates, "Permanent" the College Archivist & Records Manager will appraise the records for enduring historical value. Records identified as having

historical value will be transferred to the College Archives, while records that are identified as not having enduring historical value will be properly maintained by the responsible office. Following appraisal and selection by the College Archivist & Records Manager, the department should prepare a typed inventory of files being transferred to the College Archives and coordinate the transfer with the College Archivist & Records Manager.

Some records not listed in the records retention schedule may be important to preserve because of their enduring historical value. If your department has records you think may fall into this category, please contact the College Archivist & Records Manager to arrange an appraisal.

Examples of records not listed in the retention schedule which may be candidates for preservation in the College Archives:

- Publications, newsletters, booklets, memoranda, and other media distributed by Haverford College, including, but not limited to: bulletins, student publications, faculty/staff/administration newsletters, alumni publications, and major webpages of the College
- Photographic prints, film, tapes, reels, oral history interviews, and other media (including digital) documenting the College
- Documentation of campus life at Haverford College, especially materials which reflect the diversity of histories of the College, and of student organizations
- Documentation of significant events at Haverford College
- Maps, prints, and architectural renderings that depict the development of the College
- Artifacts relating to the history of Haverford College

RECORDS DESTRUCTION

Records that have met the retention requirements described in the records retention schedule must obtain authorization from the originating office before they are destroyed. Approximately one month prior to the disposition date, the designated Records Custodian for the department/office will notify the College Archivist & Records Manager of the material eligible for destruction. The College Archivist & Records Manager will evaluate these records for enduring historical value and the Records Custodian will either: arrange for the final disposition of approved destructions or transfer historically significant records to the College Archive. The originating offices may then:

- change the disposition dates in order to retain the material for a longer period;
- destroy the materials; and indicate the method of destruction (confidential shredding, recycle, or securely deleting).

TRAINING

The College Archivist & Records Manager will coordinate training with appropriate College partners.

REVIEW & AUDIT

The College will regularly audit and review its records management procedures and processes to ensure that they are being implemented according to College policies and requirements. Audit and review will be the responsibility of the Records Custodians within each individual department/office and in conjunction with the College Archivist & Records Manager. An audit will:

- identify areas of operation that are covered by the College's policies and identify procedures and/or guidance should adhere to the policy;
- follow a mechanism for adapting the policy to cover missing areas if these are critical to the creation and use of records, and use a subsidiary development plan if there are major changes to be made;
- set requirements by implementing new procedures, including obtaining feedback where the procedures do not match the desired activity;
- highlight where non-conformance to the procedures is occurring and suggest adjustments related to the procedures.

Physical, on-site compliance reviews of records management practices will be incorporated into the other operational reviews periodically undertaken by the College. The College Archivist & Records Manager may be asked to provide advice during the review process.

DEFINITIONS

Active Record

A record that is currently in use by the office in which it was created or received, i.e., regularly consulted in the course of business operations.

Appraisal

The process of evaluating records to determine which are to be retained as archives, which are to be kept for specified periods and which are to be destroyed.

Archives (general term)

Materials created or received by a person, family, or organization, public or private, in the conduct of their affairs and preserved because of the enduring value contained in the information they contain or as evidence of the functions and responsibilities of their creator, especially those materials maintained using the principles of provenance, original order, and collective control; permanent records.

College Record

Information created, received, and maintained as evidence and information by Haverford College or College employees, in pursuance of legal obligations or in the transaction of College business. Familiar formats include, but are not limited to paper and electronic documents, microforms, audio and video recordings, databases, and electronic mail messages.

College records include but are not limited to minutes; correspondence; memoranda; financial records, such as invoices, ledgers, purchase orders, grant documentation, and other information pertaining to fiscal matters; curricular and related materials produced in support of the mission of the college, including information about course, requirements, and programming; published materials, including reports and newsletters; moving images and photographs; sound

recordings; drawings and maps; and computer data or other machine readable electronic records, including electronic mail. Typically, but not necessarily, college records fall into some of the following categories: personnel (staff and faculty), student and curriculum, alumni, financial, research administration, health and safety, physical plant, and general administration and management records.

Not included in this definition are records created by staff members in activities outside of the College; personal private documents; and faculty research and writing. *Faculty's work in advising students, committee work or administrative roles do constitute College records.*

Confidential Record

The following types of records are considered confidential:

- "Education records" as defined by the Family Educational Rights and Privacy Act of 1974, as amended;
- Any record containing Personal Identifiable Information (PII), as defined by applicable state and/or federal law;
- Individual employment records, including records which concern hiring, appointment, promotion, tenure, compensation, performance, termination or other circumstances of employment;
- Records that include "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA);
- Records the use of which has been restricted by contract;
- All administrative and financial records of the College, unless specifically excluded by the Vice President for Finance and Administration;
- Records which might expose the College to legal liability if treated as non-confidential.

Disposition

For a record, the final action taken per the retention schedule, concluding with destruction, transfer, or permanent preservation in storage or in the archives.

Duplicate Record

A copy of a record maintained by a college office other than the Responsible Office. This is an unofficial copy that is maintained near the user for ease of access and reference. Also referred to as a reference copy or access copy

Electronic Record

Any record that is created, received, maintained and/or stored on in-premise servers and/or in College-managed cloud services, regardless of the application used (digital tools or other applications) to create that record. Examples of electronic records include, but are not limited to, electronic mail, word processing documents, spreadsheets and databases.

Family Education Rights and Privacy Act (FERPA)

FERPA is a Federal law that protects the privacy of student education records. The Act provides students with the right to inspect and review their education records; ensures that in most instances the contents of education records may not be disclosed without the student's consent; and permits students to request the modification of inaccurate or otherwise inappropriate education records.

Inactive Record

A record that is not long regularly used on a daily basis or to conduct current business but is required to be preserved until it meets the end of its retention period.

Litigation Hold

A litigation hold is an order to refrain from disposing of specific information resources, including carrying out a scheduled destruction of records, due to foreseeable or pending litigation, government investigation, audit, or special organizational requirements.

Long Term or Enduring Value

Long term or enduring value is the designation of a record that has been determined to have sufficient historical, administrative, legal, fiscal, or other value which warrants continuing retention.

Office of Origin

The office of origin is the organizational unit that creates or originally receives a record.

Office of Record

The office of record is the organizational unit designated to maintain the official record.

Official Record

An official record is the record that is retained for legal, operational, or historical purposes.

Paper Record

Any record maintained in a hard copy paper format, regardless of whether the record was originally created on paper or as an Electronic record.

Record

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. Refers to electronic and Paper records, collectively.

Records Custodian

Designated individual within a department/office who is primarily responsible for ensuring that the records management policies and any departmental or office procedures concerning management of College records are observed. Records Custodians are to serve as the intermediary between the College Archivist & Records Manager and the staff in their department/office. They are also tasked with the training and education of staff concerning records management policies and any departmental or office procedures for handling records.

Records Management Advisory Group

A broadly representative body tasked to provide guidance and support for the College Archives & Records Management Program.

Records Retention Schedule

A records retention schedule is one that describes records series broadly based on general business functions categories and can be applied across the College.

Records Series

A record series or "group" is defined as file units or other documents arranged according to a filing system or kept together because they relate to a particular subject, function, results from the same activity, document a specific kind of transaction, take a particular physical format, or have some other relationship arising out of their creation, receipt or use, such as restrictions on access and use.

The records series level is where the key activities occur- not at the document or folder level.

Retention Period

The retention period set forth in the College's Records Retention Schedule.

Retrieval

The process of locating material or information in storage and returning it for use.

Selection

The process of identifying materials to be preserved because of their enduring value, especially those materials to be transferred to an archive.

Semi-Active Record

Records that are no longer used or added to regularly but are still needed for occasional ready access. Semi-active records must not be destroyed or transferred to the Archives until the time indicated on their records retention schedules. Such records can, however, be relocated to another filing storage area within the office or a designated storage area.

Transfer

To change custody, ownership, and/or responsibility for records. Most often transfer refers to moving records with permanent value to the College Archives.

Transitory Document

A transitory document is one that is of short-term value and that can be destroyed immediately or after meeting its transitory need.

Vital Record

A record that is fundamental to the functioning of an organization and necessary to the continuance of its operations