

## Suffolk University Records Management Policy

### I. Overview

This Records Management Policy (“Policy”) provides a framework for the implementation of a university-wide Records Management Program (“RMP”). The principle goals of the RMP are to:

- maintain records in accordance with legal, fiscal, regulatory and operational requirements;
- achieve continuous, efficient and uninterrupted business operations;
- reduce the retention of non-essential records that no longer serve a business purpose;
- ensure the orderly and appropriate destruction of records as appropriate; and
- permanently preserve records that document the University’s accomplishments and form its institutional history.

### II. Applicability

The Policy applies to all faculty, administrators, and staff, as well as all agents, contractors, and representatives of the University, including any third party service provider providing services to the University who create, use or otherwise access or interact with any University Records.

### III. Definitions

**Records:** any written or recorded information that is created, executed, or received by any employee or unit of the University in connection with University business. Examples of records include: documents, forms, email messages, electronic files, data and information in computer files or systems, photographs, films, audio recordings, or other documentary materials, and any copies thereof. Nonessential records are records such as drafts, duplicates, and convenience copies, are not required to be maintained once their administrative use ceases.

**Retention Period:** The length of a time a Record must be preserved before it may be disposed of in accordance with this policy.

**Records Retention Schedule:** The Records Retention Schedule lists records commonly found in many divisions throughout the University, indicating their respective retention periods and other instructions for the disposition of those records. The RRS provides instruction on how long to keep records (retention) and when they can be destroyed or transferred to the Archives (disposition).

**Legal Hold Notice:** A notification issued by the Office of General Counsel to affected offices or departments, stating the obligation to preserve information Records related to litigation, audit, or governmental investigation.

### IV. Roles and Responsibilities

#### **Office of the General Counsel (OGC)**

OGC is directly or through delegation and oversight responsible for:

- Reviewing retention periods in the Records Retention Schedule for compliance with legal and regulatory requirements; and
- Providing notification and advice on retention periods when a Legal Hold Notice has been issued.

### **University Archivist**

The University Archivist is directly or through delegation and oversight responsible for:

- Providing oversight of the Records Management Program including the development of appropriate policies and procedures;
- Identifying and facilitating the transfer of permanent Records to the Archives;
- Preserving, cataloging and maintaining permanent Records in a condition and format that ensures their integrity and allows for their efficient retrieval and appropriate future use; and
- Providing access to permanent Records by authorized users.

### **University Records Manager**

The Records Manager is directly or through delegation and oversight responsible for:

- Developing, reviewing and maintaining the University Records Retention Policy and Record Retention Schedule (RRS) and assisting in overseeing compliance with both the Policy and Schedule;
- Developing appropriate training for personnel responsible for Record storage and maintenance;
- Establishing and overseeing an appropriate, centrally coordinated physical and electronic repository for the management of University records in accordance with this Policy, the University's "Written Information Security Program" (WISP), and the RRS;
- Providing consultation and assistance to administrative offices and academic departments, including transferring records to the Archives, identifying records eligible for destruction, and assisting in the transfer of records to offsite storage; and
- Providing support and subject matter expertise related to Records retention.

### **Department Records Resource (DRR)**

The Department Records Resource (DRR) is identified by the appropriate Dean or Vice President and is responsible for:

- Assisting with the maintenance, storage, and destruction of Records within the DRR's individual department in accordance with this Policy and the RRS;
- Ensuring the DRR's department's, as well as any contracted vendors', compliance with this Policy and the RRS;
- Representing their assigned departments in reviewing and recommending changes to the RRS periodically to identify any modifications required due to operational needs or industry recordkeeping requirements;

## **V. Policy**

### **A. General Policy**

It is the policy of the University that all Records created or maintained by the University or any of its constituent departments, units, offices, or employees in the course of institutional business are:

1. Retained in accordance with the requirements of applicable law, and for as long as needed by the University for any business purpose.
2. Appropriately maintained by designated institutional officials in a condition and format that ensures their integrity and allows for their efficient retrieval and appropriate future use during the retention period;
3. Appropriately disposed of in accordance with this Policy and the Record Retention Schedule; and

4. Appropriately maintained by third party service providers or vendors engaged to store Records in accordance with this Policy and the RRS.

**D. Record Retention Schedule Maintenance**

On an annual basis, the University Records Manager, University Archivist and the Office of the General Counsel will review the RRS to reflect changes in University operations, recordkeeping practices and legal and regulatory requirements.

In connection with the annual review, each Department Records Resource will submit to the Records Management Office any requests for RRS modifications or additional Record categories on behalf of their individual department.

**E. Record Disposition**

No Records may be destroyed or otherwise disposed of except in accordance with approved and established procedures and records schedules. Records that have (1) passed their retention period as identified in the RRS and (2) are not subject to a legal hold notice, must be destroyed (or in the case of permanent records, transferred to the University Archives) in a timely manner in accordance with the WISP and facilitated through the University Records Manager.

Records containing Confidential or Personally Identifiable information must be destroyed securely so that the data cannot be practicably be read or reconstructed in accordance with the [WISP](#).

**F. University Archives**

Suffolk University requires that permanent Records that contribute to the institutional history of the University be transferred to the Archives where they will be cataloged, preserved, and made accessible to authorized users. The RRS indicates which Records have been identified as permanent or require review by the Archives.

**VI. Violation of Policy**

Any violations of this Policy will be enforced by the Human Resources Office. Any individual that detects or suspects violations of this Policy should immediately report such actual or suspected violations to the Human Resources Office.

Policy violations may result in disciplinary actions by the University, up to and including dismissal and in some cases, may subject an individual to civil or criminal liability.

Any questions about this Policy or about the applicability of this Policy to a particular situation should be directed to the Records Manager.