

# BELOIT COLLEGE

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Policy: **Record Retention and Destruction Policy**  
Effective: March 1, 2024  
Source: VFPF  
Purpose: The purpose of this Policy is to ensure that necessary Beloit College records (electronic and physical) are adequately protected, maintained, and destroyed appropriately in a secure manner.

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## 1) Policy

This represents Beloit College's policy regarding the retention and disposal of electronic and physical records. Examples of electronic and physical records include, but are not limited to computer files, external hard drives, paper, microfiche, and film.

## 2) Administration

In order to comply with various federal and state regulations, many of the College's electronic or physical 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 by all stakeholders. Once the records have served their purpose and the regulatory requirements have been satisfied, these materials should be disposed of in an appropriate manner. 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) Confidentiality Requirement

Many electronic and physical records subject to record retention requirements contain confidential information (e.g., dates of birth, Social Security Numbers, and financial aid). These records are protected by federal, state, and local statutes, including the Health Insurance Portability and Accountability Act (HIPPA), the Family Educational Rights and Privacy Act (FERPA), and the Gramm-Leach-Bliley Act (GLBA). Electronic or physical records containing personal or confidential information must be destroyed by shredding or otherwise permanently removing the information.

## 4) Suspension of Record Disposal in the Event of Litigation or Claims

Upon notification by the Vice President for Finance & Planning (VFPF) of a subpoena, litigation, or governmental investigation/audit, the College shall temporarily suspend this Records Retention and Destruction Policy until the impacted records are identified and segregated. The VFPF will decide proper action including consultation with legal counsel, if needed.

## 5) 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.

Annually, the Department Coordinator shall review the Records Retention Schedule and identify all records that must be destroyed. After the proper disposal of all applicable records, the Certificate of Disposal Form must be submitted to the Office of the Vice President for Finance & Planning (VPFP). If changes are needed to the Records Retention Schedule, each department is responsible for forwarding the amended Schedule to the VPFP's office.

Destruction includes:

- **Recycling** - generally appropriate for all non-confidential records, including public records 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 records 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 records containing personal information, information that is student-protected information under FERPA, health-related information, or financial information.
- **Deleting** - Erasing or destroying electronically stored data across all electronic platforms and drives.

This Policy applies to all records generated in the course of the College's operation, including original and reproductions of electronic and physical records, listed below, but not limited to:

- 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