Swarthmore College Records Management Policy

Effective records management is crucial to supporting efficient administrative processes, ensuring compliance with legal requirements, safeguarding historical documents for posterity, and maintaining accountability and transparency. This document establishes a records management policy and implementation framework for Swarthmore College.[1]

1. Policy Statement and Rationale

Information is a valuable asset that, if improperly managed, can become a liability. Swarthmore College is committed to implementing a records management program that will support its educational mission.

- The ability to quickly locate and access records as needed is crucial to administrative processes. The Swarthmore College records management program promotes optimal efficiency of the administration of the College.
- Certain records at Swarthmore College are subject to legal requirements that dictate the level of security and/or period of retention that must be applied. The Swarthmore College records management program assists departments in adhering to these regulations and ensures compliance across the institution.
- Swarthmore College affirms the importance of transparency and accountability in its operations. College processes and activities will be documented in an open and verifiable manner, and these records will be made available to staff, the campus community, and other parties as appropriate (except as restricted by law or institutional policy).
- Swarthmore College is proud of its remarkable history and the heritage that are part of its distinctive character and traditions. The Swarthmore College records management program establishes an official Swarthmore College Archives, under the stewardship of the Friends Historical Library, and shores up pathways to deliver important historical documents to be preserved there for posterity.

2. Scope and Definitions

This policy applies to all records that relate to the functioning, management, and administration of the College and its constituent offices, departments, and components. As a rule of thumb, documents that fall under the College's claim in its Intellectual Property Policy[2] are records and are subject to this Records Management Policy. For example, most products of staff work and output from faculty administrative work fall under the governance of this Records Management Policy; traditional products of faculty teaching and scholarship generally do not.

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[1] The foundation of this policy is ARMA International's "Generally Accepted Recordkeeping Principles," 2014, http://www.arma.org/docs/sharepoint-roadshow/the-principles_executive-summaries_final.doc.
[2] The Swarthmore College Intellectual Property Policy is available at http://www.swarthmore.edu/its/intellectual-property.

(Other documents created by students, faculty, other members of the campus community, while not institutional records, may still be of value in documenting the history of Swarthmore College. Such materials may be transferred or donated to the College Archives or the College Libraries, per agreements between document creators and the College Archives Committee.)

Records are "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."[3] Records can take any form, including (but not limited to) paper documents, audio/video recordings and photographs, or electronic documents (emails, databases, webpages, etc.). Some records are classed as **confidential**, meaning that due to legal regulations,[4] contractual obligations, privacy issues, or other compelling concerns, they must be protected from unauthorized disclosure, modification, or destruction.

Active records are those records which are referenced or used on a regular basis and are maintained by the originating department or office. **Inactive records** are no longer actively used or referenced by the department or office that created it, but must be retained temporarily according to an approved retention period. **Archival records** have been deemed to have enduring value to the College and should usually be transferred to the College Archives for permanent preservation.

Official records are in a final form and have been authenticated by an authorized person or business application. **Duplicate records** may be created for the convenience of other departments, offices, or employees. **Drafts and working files** are preliminary versions of records. Draft and duplicate records may be kept as long as administratively useful, but should normally not be retained longer than the official record copy (except for specific cases such as audit working papers).

3. Implementation and Accountability

This policy is the guiding document of the Swarthmore College Records Management Program. The application of the policy to specific departments is determined by retention schedules, to be developed collaboratively between the department in question and the Information Security Committee. **Retention schedules** list record types, the length of time each record should be retained and the reason for retention, and, if applicable, the mode of disposition (trash/recycle, secure shred, or transfer to archives). Each schedule will also designate a **custodian of records** for each department.

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[3] Definition 3.15, International Organization for Standardization, *ISO 15489-1:2001(en) Information and Documentation*, https://www.iso.org/obp/ui/#iso:std:iso:15489:-1:ed-1:v1:en.

[4] Applicable legal regulations include, but are not limited to: "education records" as defined by the Family Educational Rights and Privacy Act of 1974 (FERPA, as amended), records that include "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and "customer information" protected by the Gramm-Leach-Bliley Act of 2000 (GLBA).

- The Office of General Counsel has general oversight of this policy, and is responsible for revising and updating it periodically. This Office also issues litigation holds in the event a legal claim is filed or reasonably anticipated, overriding disposition schedules and as appropriate, may temporarily assume custody of the records in question.
- The Information Security Committee is responsible for developing and administering a records management program for the College, and will help employees understand how to implement that program. All retention schedules must be approved by the Committee, and may undergo review by the College's legal counsel. The Information Security Committee coordinates with Information Technology Services, Facilities, and other departments on campus on records storage, standards, disposition, and other logistical issues to support the good records management practices.
- Each department is responsible for developing and updating its records retention schedule as appropriate, in coordination with the Information Security Committee. The designated custodian for each department will supervise the implementation of the departmental schedule, the maintenance of records in a safe and stable environment and then the destruction or transfer of records accordingly. The department works with Friends Historical Library staff to identify historically significant materials that should be preserved in the College Archives. The custodian will evaluate requests made by internal or external sources for access to active and inactive records, and will only provide appropriate access as allowed by law and College policy. Before providing access of records to external sources, the custodian may contact the Information Security Committee or the Office of General Counsel for additional guidance. Hold directives issued by the Office of General Counsel always take precedence over the retention schedule.
- All employees of Swarthmore College are responsible for managing and maintaining their records in compliance with the Swarthmore College Records Management Program and its corresponding directives, policies, and schedules. A failure to comply with this policy or the Swarthmore College Records Management Program may be grounds for College action against responsible employees, as appropriate.
- The Friends Historical Library collects and preserves the institutional archives of Swarthmore College. FHL appraises records for their long-term value, preserves materials in the archives, and makes them accessible to the campus community and/or the public according to documented access policies.

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