

C22.0 RECORDS MANAGEMENT POLICY

1. Introduction

This Policy seeks to ensure that RIT Records, especially those that are required for compliance with the law, are retained for a sufficient period of time. In addition, this Policy seeks to ensure that RIT Records which document the history of RIT are preserved.

This Policy should be read together with the other policies of RIT. RIT's policies are available online at www.rit.edu/policies. The electronic version of this Policy will, from time to time, contain "Frequently Asked Questions" which interpret and detail the applicability of the Policy to various practical situations.

2. Effective Date

This Policy will be effective on May 13, 2009 ("Effective Date"). It will apply to all divisions, departments and academic units of RIT.

3. Definitions

Terms not otherwise defined herein have the meanings listed below.

A. **Active Record** means a record with current administrative use for the division, department, or academic unit that created it. Records remain active for varying numbers of years, depending on the purpose for which they were created.

B. **Archival Record** means a record that is inactive, not required to be retained in the office in which it originated or was received, and has permanent or historic value. Archival records are retained and preserved indefinitely in the University archives.

C. **Hold Notice** means a communication issued by the Office of Legal Affairs as a result of a current or anticipated government regulation, investigation, litigation or other matter that warrants the suspension of this Policy.

D. **Record** means any document, communication, or similar item generated or received by RIT, by RIT personnel, or on RIT's behalf.

E. **Official Repository** means the division, department, or academic unit designated as having responsibility for retention, timely destruction of particular types of official University records, or forwarding to RIT Archives. Such responsibility is assigned to the division, department, or academic unit's vice president, director, dean, or designee.

38 F. **RIT Archives** means a department of the RIT Wallace Library that promotes knowledge and
39 understanding of the University's origin, aims, programs, and goals; and facilitates effective
40 record management.

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42 G. **RIT Record** means the original or copy of any record which must be held for official business
43 or regulatory purposes in accordance with the university's Records Retention Schedule. RIT
44 Records do not include records that are not created in the official course of business, serve no
45 legitimate or necessary business purpose, or are created for personal purposes only.

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47 H. **Personnel** means all RIT staff and faculty, full-time and part-time, including student
48 employees acting within their scope of employment, non-employee consultants, visitors,
49 adjuncts and others using university resources.

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52 I. **Scope of Employment** means all activities related to the employment responsibilities of
53 personnel.

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55 J. **Confidential Record** means a record that contains personal information protected from
56 disclosure by law or RIT policy.

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58 K. **Electronic Record** means a record maintained on a RIT network, email server, back-up
59 tape, CD-ROM, hard drive, or data storage location.

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61 L. **Student Employee** means students, who are also RIT employees, acting within the scope of
62 employment.

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64 M. **General Correspondence** means emails, letters, or notes received in the course of
65 business that is directly related to the mission of a particular department, division, or academic
66 units.

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68 4. General Provisions

69 A. Purpose

70 The purpose of this Policy is to require consistent treatment of Records. This Policy is intended
71 to ensure that RIT meets legal standards, preserves RIT's history, and destroys outdated and
72 useless records.

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74 B. Scope

75 All personnel shall comply with this Policy, as amended from time to time. This Policy is
76 considered part of the conditions of employment for RIT personnel.

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78 C. Management of University Records

79 Divisions, departments, or academic units that are Official Repositories for RIT Records are
80 responsible for establishing appropriate records retention management practices.. Each
81 division, department, or academic unit's vice president, director, dean, or designee must:

- 82 1. Implement the division, department, or academic unit's record management practices;
- 83 2. Identify a records custodian for the division, department, or academic unit with
- 84 responsibility to ensure that these record management practices are consistent with this
- 85 Policy;
- 86 3. Educate staff within the division, department, or academic unit in understanding the record
- 87 management practices;
- 88 4. Preserve inactive records of historic value and transfer those records to the RIT Archives;
- 89 5. Ensure that access to confidential files is restricted; and
- 90 6. Destroy inactive records that have no archival value upon passage of the applicable
- 91 retention period by the Office of Legal Affairs.

92 D. **Suspension of Policy / Legal Holds.** This Policy may be suspended for any Record due to a
93 requirement by a consent order, private or governmental contract, pending or anticipated
94 litigation, investigation, or audit requirement. Such suspension supersedes the requirements
95 listed in this Policy and shall be made by the Office of Legal Affairs, which has the authority to
96 suspend and revise any retention schedule. The Office of Legal Affairs will implement such a
97 suspension by sending out a Hold Notice for relevant records to affected divisions, departments,
98 or academic units. This Hold Notice shall be in effect until rescinded by the Office of Legal
99 Affairs.

100 5. Implementing Record Management Practices

- 101 A. **Retaining of Records.** In establishing appropriate record management practices, each
102 division, department, or academic unit's vice president, director, dean or designee will be
103 responsible for setting up a process for the identification of RIT. In addition, in connection with
104 setting up record management procedures, the following should be considered and
105 incorporated:
- 106 1. Archival Records. Generally, Records which document the history of administration,
107 academic programs, and the social and cultural life of RIT should be preserved. To decide
108 if the RIT records are of historic value, consult the RIT Archivist, who has the authority to
109 designate which records are Archival Records.
 - 110 2. Electronic Records. The retention and preservation of electronic records shall be in
111 accordance with this Policy. If an electronic record falls within one of the retention
112 schedule's categories of records, then the record must be treated the same way as a
113 similar hard copy record.
 - 114 3. Email. In considering the nature of email for retention purposes, an email and its
115 attachments should be considered as a whole. If one retention period applies to an email
116 and a different retention period applies to the email attachment(s), the entire email with
117 attachment(s) should be retained for the longer of the two retention periods. If a person is
118 merely copied on an email (either listed as a "cc" or "bcc"), he/she should treat the
119 document as a duplicate in accordance with sub section 5 below.
 - 120 4. Disaster Recovery. Electronic records maintained by the Information Technology Services
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123 (ITS) for disaster recovery and backup purposes only shall be retained and preserved by
124 ITS in accordance with a uniform rotation schedule. This uniform rotation schedule shall
125 require that no ITS backup of electronic records shall be maintained for longer than thirty
126 (30) days.

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- 128 5. **Duplicates.** Generally, only one copy of each record shall be retained. A duplicate is an
129 exact replica of the original and shall be destroyed as soon as it does not serve a
130 legitimate business purpose and as long as is not subject to a Hold Notice indicating
131 otherwise. Prior drafts, revisions, or original documents that have additional hand written
132 notes are not considered duplicates of the original and shall be subject to the same
133 requirements as an original record.

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- 135 B. **Destruction of Records.** Records that are neither Active Records, Archival Records, RIT
136 Records, nor the subject of a Hold Notice should not be maintained. In addition, when the
137 required retention period for RIT Records has passed, a determination of whether to preserve
138 the record as an Archival Record or to dispose of the record must be made. The division,
139 department, or academic unit's vice president, director, dean, or designee should make this
140 determination, in consultation with the RIT Archivist. The division, department, or academic
141 unit's vice president, director, dean, or designee shall certify annually in writing to the Office of
142 Legal Affairs that compliance with this policy has been achieved for the prior academic year.

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- 144 C. **Using the Retention Management Schedule.** Divisions, departments, or academic units may
145 establish their own records management policy, with the approval of the Office of Legal Affairs,
146 to determine the retention period for the Records created and/or kept in their respective areas.
147 Current retention schedules for RIT divisions are located on the Office of Legal Affairs website.

- 148 1. If two or more categories with different retention periods are applicable to a record,
149 the record shall be retained for the longest applicable retention period.
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- 151 2. Records required to be destroyed must not be destroyed before the prescribed
152 retention period has expired. Records that are required to be destroyed and are
153 subject to specific retention periods shall be destroyed within a reasonable period of
154 time following the expiration of the retention period unless subject to a Hold Notice.
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- 156 3. The default retention period for records whose retention period has not been
157 specifically determined shall be six (6) years.

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- 161 D. **Exceptions.** Requests for exceptions to this Policy should be granted rarely and only with
162 good cause. Requests for exceptions to this Policy should be submitted to the Office of Legal
163 Affairs.

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- 165 E. **Training.** Each division, department, or academic unit's designee or records custodian will be
166 responsible for ensuring their personnel are informed of the Policy and procedures established
167 pursuant to the Records Management Program and devising the appropriate training to ensure
168 appropriate implementation.

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172 **Please refer to the Office of Legal Affairs website for the official current retention schedules governing**
173 **each RIT division.**

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175 **Responsible Office:**
176 Office of Legal Affairs

177 **Effective Date:**
178 Approved May 13, 2009

179 **Policy History:**
180 Edited August 2010

181 Edited September 2012 (conversion edit)

182 Edited September 22, 2014 (ICEC) – sections III.G, H.; IV.B, C; V.A, C, G, I; VI.A, C

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