

## **University of Hartford Record Retention Policy**

### 1. Policy Statement:

It shall be the policy of the University of Hartford to retain its records consistent with sound business practice and in accordance with applicable regulatory and other legal standards, professional association recommendations and contractual obligations, and to destroy those records which no longer need to be retained according to those principles. Record retention and destruction shall be managed at the officer level consistent with the principles set forth in this policy. Coordinated records retention enables the University to preserve its history, ensure that critical records are available to meet business needs, support the University's and departmental continuity and business recovery plans, preserve documentation necessary in the event of an audit, litigation or other external action, comply with applicable legal and contractual requirements, optimize its use of space, minimize its record retention cost and ensure that outdated and useless records are destroyed. This policy shall apply to all University records in whatever format they are maintained, including without limitation records maintained on paper, on film or microform, or electronically.

### 2. Responsible Personnel:

Responsibility for implementation of this policy shall lie at the officer level, subject to delegation by each officer to appropriate unit managers in the officer's discretion. All University faculty and staff responsible for the maintenance of University records shall comply with the provisions of this policy.

### 3. Schedule of Records Retention and Destruction:

- a. For each department or other unit of the University, a "Records Retention Table" will be created with the following information for each category of records maintained by that unit:
  - i. A description of category;
  - ii. Whether the unit is the primary or a secondary record-keeper for that category of document;
  - iii. The "Retention Period" – i.e., length of time that records in that category shall be maintained by that unit – after which the records shall be destroyed, subject to paragraphs 4 and 5, below.
  - iv. The means by which records in each category should be destroyed – e.g., shredding versus trash; and
  - v. The format or formats in which the category of records is maintained -- e.g., electronic, hard copy.

- b. The length of time for retaining records by each unit in each category shall be determined using the following criteria:
  - i. The operational needs and business continuity and recovery needs of the unit, including consideration of how long after active operational use the records should be maintained;
  - ii. Any regulatory or other legal obligations for maintaining the records;
  - iii. Any contractual obligations with third parties for maintaining the records;
  - iv. Whether the records have any archival or historical value;
  - v. The business continuity and business recovery needs of the unit; and
  - vi. Any other relevant factors identified by the unit.
- c. Subject to Paragraphs 4 and 5, below, records which have reached the end of their retention period shall be destroyed according to the methodology identified in the Records Retention Table. Records which contain personally identifiable information, confidential or privileged information, and other information of a sensitive nature shall be destroyed by shredding or comparable methodologies.
- d. Records stored by each unit shall be reviewed at least annually to determine whether the unit's Records Retention Table is being complied with.
- e. All said Records Retention Tables shall be provided to the General Counsel.

4. Legal Holds and Extensions of Retention Periods:

- a. Any document which may contain information of relevance to litigation or threatened litigation or other formal or informal claim of a dispute arising between the University and any other party, service of legal process (e.g., subpoenas, summonses), or internal or external investigation or audit shall not be destroyed until the Office of the General Counsel or Office of Internal Audit, as applicable, informs the unit that the records may be destroyed, notwithstanding the Retention Period for that category of records.
- b. Certain records may need to be retained beyond their Retention Period pursuant to applicable law, court order, contract or other binding obligation. Each unit's senior official is responsible for maintaining records beyond the applicable Retention Period whenever that individual knows or is notified that those particular records are subject to such a law, order, contract or obligation.
- c. Records shall be retained beyond their Retention Period if the unit is instructed to do so by the Office of the Provost, the Office of the Vice President for Finance and Administration, the Office of Internal Audit or the Office of the General Counsel.

5. Records Storage:

Records shall be maintained during their Retention Period in a manner keeping them safe from deterioration. Units storing records electronically, on microform or film, or in other non-paper media shall confirm annually that the records are still accessible on University equipment.

6. Archival Materials:

Before records are destroyed, the unit's senior official shall review the records to determine if they may have archival or other historical interest. If any records are identified as having potential archival or historical interest, the University archivist will review the records and determine whether they should be retained for archival purposes.

7. Off-Site Storage:

Records may be maintained at an off-site facility approved by University Purchasing for records which have not yet reached their Retention Period but are not required for normal operational needs of the unit.

8. Storage of Personal and Confidential Records:

Records which contain information about one or more individuals and which can be identified to one or more individuals should be treated with particular regard to confidentiality and security, unless the information is generally available to the public. Such records shall be maintained in accordance with applicable laws and University policies, including without limitation FERPA, HIPAA and the University's information security policy.