



NORTHWESTERN
UNIVERSITY

Responsible University Official: Provost &
Senior Vice President for Business and
Finance

Responsible Office: Office of the Provost &
Office of the Senior Vice President for
Business and Finance

Origination Date: June 30, 2009

RETENTION OF UNIVERSITY RECORDS

Policy Statement

Northwestern University and various federal and state laws require that different types of records be retained for specific periods of time. The University has designated official repositories and a retention schedule for maintenance of these records. These records should be managed according to procedures that are outlined in this document.

Reason for Policy/Purpose

The University is committed to effective records retention to meet business needs, preserve its history, comply with legal standards, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed.

Table of Contents

Page

| | |
|--------------------------------------|---|
| Policy Statement..... | 1 |
| Reason for Policy/Purpose | 1 |
| Table of Contents | 1 |
| Who Approved This Policy..... | 1 |
| Who Needs to Know This Policy..... | 2 |
| Website Address for This Policy..... | 2 |
| Contacts/Responsibilities..... | 2 |
| Definitions | 2 |
| Policy/Procedures | 2 |
| Forms/Instructions | 4 |
| Appendices... .. | 5 |
| Related Information..... | 5 |
| History/Revision Dates | 5 |

Who Approved This Policy

Provost
Senior Vice President for Business and Finance

Who Needs to Know This Policy

- Deans, Directors, and Department Heads
- Administrative staff responsible for the maintenance of University records
- Anyone accessing University records

Website Address for this Policy

http://policies.northwestern.edu/docs/Retention_of_University_Records_030410.pdf

Contacts

If you have any questions on the policy, you may:

1. Call the Office of General Counsel at 847-491-5605, IT Information and Systems Security/Compliance at 847-467-1512, the Office for Audit and Advisory Services at 847-491-3304 or the University Archivist at 847-491-3354
2. Send an e-mail to policy@northwestern.edu

Definitions

| | |
|-----------------------------------|---|
| Archivist | An individual with responsibility for management and oversight of an archival repository of records. |
| Official Repository | The office/department listed on the Records Retention Schedule that is responsible for maintaining Records. |
| Permanent records | A Record that by virtue of the importance of the information it contains should be retained in perpetuity by the University. |
| Record | Recorded information of any kind and in any form including writings, drawings, graphs, charts, images, prints, photographs, microfilms, audio and video recordings, data and data compilations, and electronic media, including e-mail. |
| Records Retention Schedule | A descriptive schedule that provides a guideline for the minimum length of time that selected Records should be retained before they are deleted/destroyed or placed in archival preservation. |
| Retention period | The length of time a Record must be kept before it should be deleted/destroyed or placed in archival preservation. |
| University Archives | The repository, housed in the Charles Deering Library, for permanent, non-current Records of enduring value. |

Policy/Procedures

University Records Management Program

The primary reasons for retaining Records are that they are required for business or legal purposes or they have enduring value.

This Records Retention Schedule is a guideline that sets forth the minimum length of time that Records should be retained by the Official Repository. The schedule allows the University to meet its business and legal needs, and to optimize the use of space, minimize the cost of record retention, and ensure that outdated or useless Records are deleted/destroyed.

Offices/departments should review their retention practices with the office/department identified as the Official Repository.

Record Preservation: Record retention periods for selected Records may be increased for various reasons including government regulation, judicial or administrative orders, contracts, pending or threatened litigation or audit requirements. Such changes in the Records Retention Schedule supersede the requirements listed in this schedule. Suspension of records destruction required for any reason will typically be accomplished by a notice sent out to affected units by the office requesting the modification to the Retention Schedule (e.g. Office of General Counsel, Office for Audit and Advisory Services, Office of IT Information and Systems Security/Compliance, Office for Research Integrity, etc.). Upon receipt of instructions directing the preservation of Records, employees in the affected department are responsible for ensuring that the Record Retention Schedule is suspended and that Records are not altered or deleted/destroyed until further instruction.

Records Management: When needed, the University Archivist provides advice as to what non-current records of enduring value should be transferred to the Northwestern University Archives at the Charles Deering Library. An office/department's archival records may be transferred to the University Archives following these procedures:

<http://www.library.northwestern.edu/archives/donor.html>

University Records Disposal

Records for which there is a retention requirement in the Retention Schedule are recommended to be deleted/destroyed by the Official Repository when they have reached the conclusion of their retention period *unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.*

Offices/departments other than the "official repository" should delete/destroy any duplicate records promptly *unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.*

Records for which there is no retention requirement in the Retention Schedule should be deleted/destroyed promptly *unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.*

Records created, retained, or stored electronically should be retained or deleted/destroyed on the same basis as traditional/paper records.

Records should be deleted/destroyed in ways commensurate with their confidentiality and with methods which do not permit recovery, reconstruction or future use of confidential information. For example:

Paper records containing confidential information (such as personally identifiable information) should be shredded, not placed in recycle bins and not simply thrown out with other classes of records or with miscellaneous trash.

Electronic or machine readable records containing confidential information should be deleted/destroyed through thorough degaussing, multiple overwrites, or physical destruction of drives, disks, tapes or other magnetic or electronic storage media to ensure proper destruction. It is the responsibility of the office/department or individual in possession of a University owned computer(s) to ensure that data has been properly removed from the hard drives of computers before removal or redeployment by one of the following two methods:

For computers that are **slated to be removed** from University ownership, utilize University Services' Computer & Peripherals Recycling Program to handle the proper removal of data and recycling of hardware
<http://www.northwestern.edu/userservices/office/computer/index.html>.

For **computer redeployment** within the University or for disposal not by University Services, follow the *Disposal of Northwestern University Computers Policy* <http://www.it.northwestern.edu/policies/disposal.html>.

Film, audio, recording and videotapes containing confidential information should be physically destroyed, not simply thrown away. It is possible to overwrite audio and videotapes with other, non-confidential sound and images, but if this is done, it is recommended that it be done by an authorized member of the staff in the office that originated the records.

Destruction performed by vendors shall be subject to the same procedures as those which are described in this policy and which apply to all University employees.

E-Mail

E-mail should be handled as any other Record in terms of retention and disposal.

Forms / Instructions

NA

Appendices

A – Retention Schedule

http://policies.northwestern.edu/docs/RUR_Appendix_A061913.pdf

Related Information

NA

History/Revision Dates

Origination Date: June 30, 2009

Last Amended Date: March 4, 2010

Next Review Date: 2019