

RECORDS DESTRUCTION PROCEDURES

Records that have met the retention requirements described in the records retention schedule must obtain authorization from the originating office before they are destroyed. Approximately one month prior to the disposition date, the designated Records Custodian for the department/office will notify the College Archivist & Records Manager of the material eligible for destruction. The College Archivist & Records Manager will evaluate these records for enduring historical value and the Records Custodian will either: arrange for the final disposition of approved destructions or transfer historically significant records to the College Archive.

The originating offices may then destroy the records per approved method (confidential shredding, recycling, or secure deleting). The process below outlines the steps to follow in order to dispose of college records.

Check for Eligibility

In order to determine and properly undertake the disposition of their records and comply with the Records Management Policy, departments and offices should:

- Consult the Records Retention Schedule to determine if the records are eligible for destruction.
- Contact the College Archivist & Records Manager for assistance in interpreting the Records Retention Schedule or create a new schedule if needed.
- Ensure that they do not destroy college records that are currently part of, or are likely to be part of, any legal action or proceeding, litigation, audit, investigation, or review, even if the records retention schedule indicates that the records are eligible for destruction.

Prepare Records for Destruction

Inventory the Files

Perform an initial review of the files in order to classify them into broad categories (e.g. invoice vouchers, general ledger statements, student records, etc.) Identify the date range (e.g. FY09-FY12 or 1998-2005) and the volume of documents (in number of boxes, file cabinet drawers, or gigabytes). Record information in a spreadsheet. The Volume Estimation Guide may be a helpful resource for this task.

Identify Duplicates and Non-Records

Many documents in a department/office are likely non-records or duplicates, neither of which requires approval prior to disposition. The identification of college records versus non-records will be helpful at this step. If unsure as to whether a document is a record

or a non-record, contact the College Archivist & Records Manager to help identify non-record material.

Determine Destruction Type

The means of destruction depends on the type of information that is contained in the record. All departments/offices should authorize destruction of records in ways commensurate with their confidentiality and with methods which do not permit recovery, reconstruction and future use of confidential information.

Confidential Information

The following types of records are considered confidential:

- “Education records” as defined by the Family Educational Rights and Privacy Act of 1974, as amended;
- Any record containing Personal Identifiable Information (PII), as defined by Pennsylvania and/or Federal Law;
- Individual employment records, including records which concern hiring, appointment, promotion, tenure, compensation, performance, termination or other circumstances of employment;
- Records that include "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA);
- Records the use of which has been restricted by contract;
- All administrative and financial records of the College, unless specifically excluded by the Vice President for Finance and Administration;
- Records which might expose the College to legal liability if treated as non-confidential.

Confidential records must be destroyed by shredding. Electronic records must be overwritten, or the storage media physically destroyed. Employ the services of confidential record destruction or use a cross-shredder to shred paper records in-house. *Haverford College Purchasing has established contracts with DocuVault-document shredding vendor. Contact the Purchasing to coordinate vendor shredding.*

Non-Confidential Information

Non-confidential records are those that do not contain sensitive or personally identifiable information and that have a wide and open distribution at the time of their creation. Records may be destroyed by general trash services, recycling, and/or deleting electronic information.

Documenting Destruction

Please document your records destruction using the Records Destruction Form. You can use this form to keep track of the records you destroy and when.