

WESTMONT COLLEGE RECORDS MANAGEMENT POLICY

POLICY STATEMENT

The College is committed to effective record management to preserve its history, meet legal standards, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed. To that end, the College enacts this policy for the management of active and inactive departmental records.¹

PROCEDURE

Departments that maintain college records have established appropriate record retention management practices that are outlined in this policy. Each department:

- Implements the department's record management practices
- Ensures that the practices are consistent with applicable law
- Educates staff on appropriate records management
- Ensures access to confidential records is restricted

When the record's retention period has passed each department makes a determination of whether to preserve or dispose of the documents.

- Preservation: Transfer inactive records of historic value to the college archivist²
 - Contact college archives at extension 6209 or by email at archives@westmont.edu
- Destruction: Destroy inactive records that have passed their retention period and have no archival value
 - Where destruction of records is appropriate:
 - Non-confidential records: recycle using bins in respective offices
 - Confidential records: shred; or discard for shredding by college's confidential document destruction service
 - Electronic: Purge electronic records from local drives and server

RECORDS SCHEDULE

The following table, while not exhaustive, represents the retention and destruction schedule for records of administrative departments. Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such modifications supersede the requirements listed in this policy. Suspension of record destruction

¹ A record is the original or copy of any writing, sound or video recording, in any format, generated and/or received by a department for its administrative use. Active records are current writings, sound and/or video recordings, in any format, necessary for departmental administrative purposes and retained for a requisite statutory period. Inactive records are writings, sound and/or video recordings, in any format, that have passed their retention period, are no longer necessary for departmental administrative purposes and outside of archival use.

² The purpose of the Westmont College Archives is to appraise, collect, organize, preserve, exhibit, make accessible and permanently retain items relating to college history.

required for any of these reasons will be accomplished by a notice sent out to affected department and/or individual personnel by College Counsel.

OFFICE	RECORD TYPE	STORAGE LOCATION	DURATION
ACADEMIC DEAN	<ul style="list-style-type: none"> • Faculty Contracts • Candidate applications • Promotion & Review Evaluations 	<ul style="list-style-type: none"> • Academic Dean's Office cabinet files 	<ul style="list-style-type: none"> • 3 years applications • 3 years • Promotion and Review Evaluations indefinitely
ADMISSIONS	<ul style="list-style-type: none"> • Denied & Incomplete Applications • Supporting material for confirmed and/or enrolled students 	<ul style="list-style-type: none"> • Office of Admissions cabinet and electronic files 	<ul style="list-style-type: none"> • 1 year cabinet file storage retained electronic retention for indefinite period thereafter
ADVANCEMENT (OCA)	<ul style="list-style-type: none"> • Prospect and donor contact reports • Gift backup • Pledge agreements • Correspondence • Research • Endowment reports • Trustee giving reports • Credit card receipts (merchant copy) • Voided checks for recurring EFT transactions • Matching gift forms • Gift in kind forms • Grant agreements/contracts 	<ul style="list-style-type: none"> • OCA cabinet files located in "Great Room" and electronic files 	<ul style="list-style-type: none"> • Credit card receipts 2 years • All other documents retained indefinitely
ADVISING & DISABILITY SERVICES	<ul style="list-style-type: none"> • Student Advising Records • Student Disability Services records 	<ul style="list-style-type: none"> • Office of Advising and Disability Services cabinet and electronic files 	<ul style="list-style-type: none"> • 5 years all records

BUSINESS	<ul style="list-style-type: none"> • Invoices • Notes Receivable • Investment Records • Account Statements 	<ul style="list-style-type: none"> • Business office electronic files 	<ul style="list-style-type: none"> • 7+ years
FINANCE	<ul style="list-style-type: none"> • Contracts for sale/purchase of land • Housing agreements • Wills & Trusts 	<ul style="list-style-type: none"> • Campus Storage – Kerrwood Hall Basement • Business Office Safes 	<ul style="list-style-type: none"> • 6 years • 10 years
HUMAN RESOURCES	See Separate Schedule Attached		
PAYROLL	<ul style="list-style-type: none"> • Time cards • Withholding Forms • Schedule of pay • Deductions • Levy Notices • Paid Time Off Reports • Tax Records 	<ul style="list-style-type: none"> • All records kept in the Business Office 	<ul style="list-style-type: none"> • 7 years all records
PROCUREMENT	<ul style="list-style-type: none"> • Service provider contracts • Purchase agreements 	<ul style="list-style-type: none"> • Office of procurement cabinet and electronic files 	<ul style="list-style-type: none"> • 7 years all records
REGISTRAR	<ul style="list-style-type: none"> • Transcripts • Student schedules • Subpoena for student records 	<ul style="list-style-type: none"> • Electronic PDF storage 	<ul style="list-style-type: none"> • Permanent retention
STUDENT LIFE	<ul style="list-style-type: none"> • Discipline records • Consent to release records 	<ul style="list-style-type: none"> • All records stored electronically in Advocate system 	<ul style="list-style-type: none"> • 5 years • 1 year

RECORDS REQUESTS

Internal Requests

Internal requests for inspection, review and/or copy of college records can be made to the office where the records are maintained. Generally, the law provides the college with a reasonable amount of time to comply with student and employee requests to access their personnel or educational record. Employees may request to inspect their own files by appointment with the office of Human Resources; and will be provided copies of any documents bearing their signature within a reasonable time upon request.

Students may request to inspect and review their educational record by contacting the Office for Student Life. In accordance with federal law, multi-student records³ will require redaction in order to protect the privacy of the non-requesting student(s).

Inter-office requests for records of other types for legally appropriate and legitimate business purposes is determined in accordance with regular practice.

External Requests

External requests for inspection, review and/or copy of college records should be directed to College Counsel.

POLICY REVIEW

The college will review this policy periodically to ensure its consistency with applicable law and make modifications where appropriate. For questions regarding records covered under this policy, contact the department responsible for maintaining the records in question. For questions about the policy, contact College Counsel, Toya Cooper, at extension 6832 or by email at tcooper@westmont.edu.

³ A multi-student record is an educational record which includes information directly related to more than one student. The Family Educational Rights and Privacy Act of 1974 requires that educational institutions redact all information leading to the identity of the non-requesting student where the requesting student record includes information about any other student.

HUMAN RESOURCES DOCUMENT RETENTION SCHEDULE

RECORD TYPE	DURATION	DESTRUCTION DATE
Employee Files	3 yrs	Kept even after termination
Reference letters	3 yrs	Kept even after termination
Offers	3 yrs	Kept even after termination
Applications	3 yrs	Kept even after termination
Performance reviews	3 yrs	Kept even after termination
Changes in pay, title, etc.	3 yrs	Kept even after termination
Interview records	3 yrs	Kept even after termination
Applicant information on those not hired	2 yrs	2 years
Legal files	Until final disposition of case	Not destroyed
First Aid and Worker's Comp claims	5 yrs after date of injury	have paper files back to 1978
Pre employment physical results	1 year	Every 2 years
Asbestos exposure results	30 yrs	keep indefinitely
Respirator testing	30 yrs	keep indefinitely
OSHA log	5 yrs	keep indefinitely
Classified ads	2 yrs	(have stored electronically back to 2001)
I-9 forms	3 years after hire date or 1 year after termination, whichever is later	Records examined and purged as required.
Immigration files	1 year beyond the last date an H-1B is employed	Not destroyed
FMLA/SDI files	3 years, if no claim is pending	(have paper files back to 1992)
Insurance bills	6 years	Every 6 years
Retirement plan contracts	1 year from termination of plan	Not destroyed
Background checks not kept at Westmont College-database w/ vendor only	5 yrs	(saved electronically by vendors)
Unemployment claims	3 yrs	indefinitely
Temporary agency contracts	1 yr	2 yrs
Benefits bills	6 yrs	6 yrs

Plan descriptions	duration of plan and 1 yr after termination of plan	indefinitely
Contracts	1 yr after termination of plan	indefinitely
COBRA	indefinitely	indefinitely
HIPAA docs	6 yrs	6 yrs