1. POLICY STATEMENT

This policy provides for the systematic review, retention, and disposition of records received, created, or maintained by Westminster College (College) in connection with College business. This policy contains a schedule for how long certain records should be retained and how they should be disposed of (unless they are under a legal or other similar investigation, or are otherwise subject to a litigation hold). This policy is intended to enhance compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate the College's operations by promoting efficiency and freeing-up valuable storage space.
2. TO WHOM THIS POLICY APPLIES

This policy applies to all departments, offices, committees, boards, and employees of the College and the types of records in the retention schedule in Appendix A.

3. DEFINITIONS

A. **Records**: Records include any documents or records created, received, or maintained by College departments, divisions, offices, and employees of the College in connection with College business, regardless of physical form (hard copy or electronic form, including email) and regardless of whether they are located on campus or elsewhere.

B. **Confidential Information**: Confidential Information includes, but is not limited to: any personally identifiable information, student and parent records, financial records (including social security and credit card numbers), and health records; contracts; research data; alumni and donor records; personnel records other than an individual's own personnel records; College financial data; computer passwords, College proprietary information/data; and any other information for which access, use, or disclosure is not authorized by: 1) federal, state, or local law; or 2) College policy or operations.

C. **Financial Records**: Financial records includes any records containing social security numbers, financial account information, tax returns, asset statements, bank or credit card account numbers, income and/or credit information, or any other records containing personally identifiable financial information regarding students, parents, employees, alumni, potential donors, and other third parties.

D. **Internal-Use-Only Data**: Data that requires protection against unauthorized disclosure, modification, destruction, and use, but the sensitivity of the information is less than that for Confidential Information. Examples of Internal-Use-Only data are internal memos, minutes, correspondence, and other documents whose distribution is limited as intended by the author.
4. POLICY

A. Document Retention

Westminster College will retain documents in accordance with the Westminster College Record Retention Schedule set forth in Appendix A. Documents not listed in the schedules that are substantially similar to those listed in the schedules, or that pertain to a particular transaction or matter documented by a record listed in the schedules, should be retained for the length of time required for the substantially similar/related document. Questions regarding the required retention period for documents not identified in the schedule should be directed to the Office of General Counsel.

B. Electronic Records

Electronic records will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the schedule, or that represent a substantially similar/related document as discussed in paragraph A above, will be maintained for the scheduled length of time. E-mail messages and/or other electronic files that need to be retained under this policy should be stored in an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis by the Chief Information Officer.

C. Disaster Planning and Preparedness

College disaster planning and preparedness records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the College operating in case of an emergency will duplicated and backed-up on a regular schedule by the Chief Information Officer.

D. Maintenance of Records by Faculty, Administrators, and Supervisors

When leaving a faculty, administrative, or supervisory position, employees must leave all records which need to be retained according to this policy with their successor, or in the case of records containing confidential information, transfer them to the Office of General Counsel for review and recommendation as to the appropriate maintenance or disposition of such records.
E. Document Disposition

- **Disposition Oversight.** Departments are responsible for the safe and secure maintenance, storage, and disposition of departmental records, with oversight by the relevant cabinet member. The Office of General Counsel will serve as a resource for the ongoing process of identifying records that meet the required retention period.

- **Disposition Method.** The following hardcopy records will be destroyed by shredding: 1) college financial records; 2) personally identifiable financial, medical, student, or personnel records; and 3) any other documents or records containing confidential information or internal use only data. If in doubt as to the proper method to destroy a document, shred it.

- **Disposition Log.** Departments should keep a log of records disposed of that are covered by the retention schedule, specifying the records disposed of (including the years covered), their retention period, the date and method of disposition (including the identity of any third party vendor handling the destruction), and the department head authorizing destruction. Departments should be specific and consistent in their descriptions of records disposed of. A record retention disposition form can be found as Appendix B to this policy and is available on the college website.

F. Litigation Hold

Record disposition will be suspended immediately and all potentially relevant records and documents, whether listed on the record retention schedule or not, must be preserved and maintained when a lawsuit is filed or is reasonably anticipated. Documents that are subject to a "litigation hold," as determined by the Office of General Counsel, shall be preserved and retained until such time as the Office of General Counsel specifically authorizes the disposition of records.
5. COMPLIANCE AND COOPERATION

The College expects all employees to comply with this policy with regard to all college-related records and documents regardless of where located and to cooperate with any College request for disclosure of records subject to this policy. Violations of this policy may result in sanctions and corrective actions, up to and including termination.

6. RESPONSIBLE ADMINISTRATORS

Members of the president’s cabinet are responsible to enforce this policy.

7. RELATED DOCUMENTS

- Appendix A – Westminster College Record Retention Schedule
- Appendix B – Westminster College Record Retention Disposition Form

8. HISTORY

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<th>Action Taken</th>
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<tr>
<td>August 27, 2019</td>
<td>Interim Record Retention and Disposition Policy Approved</td>
<td>President’s Cabinet</td>
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9. SIGNATURE, TITLE, AND DATE OF APPROVAL

Approved: /s/________________________________________
Bethami Dobkin, President