DOCUMENT/RECORD RETENTION POLICY   
for BERMUDA COLLEGE

## Policy Statement

This policy has been created to outline a process to manage the records created in the course of the College’s academic and administrative operations. The Policy covers all records and documents, (including electronic documents), and contains guidelines for how long certain documents should be kept, and how records should be destroyed.

It is designed to accomplish the following objectives:-

* promote compliance with the Public Access to Information (PATI) Act 2010 (2) (6)
* minimize accidental or innocent destruction of records
* facilitate College operations by promoting efficiency of storage space

1. **Purpose**

This Policy will provide guidelines for records retention at Bermuda College. It will be available on the College website (include link) for continued reference.

*The management of records includes appropriate practices for organising and archiving those records determined to have permanent or enduring value, and proper destruction of those records deemed not to have permanent or enduring value once operational needs have been met*.

The Policy applies to all Bermuda College employees. It also applies to all student employees, independent contractors and volunteers whose work or services for Bermuda College require the management of the College’s records. Managers are responsible for ensuring that records in their respective areas are managed appropriately.

1. **Records at Bermuda College**

A **record** is anything containing information reflecting College educational and business transactions regardless of its format (paper, digital, photographic, audio and video recordings, databases and text messages.) Typical records include official publications, fiscal data, incoming/outgoing correspondence (including e-mail), and minutes of meetings, reports and student files. Not all records need to be retained, and may be destroyed at any time if they are no longer needed by the office holding them. They include:-

* large quantities of duplicate materials and all duplicates of ‘official copies’
* non-Bermuda College published magazines and newspapers
* published reports produced by other entities
* purchased data from other sources
* blank letterhead or other blank forms
* routing slips or telephone messages
* catalogues, journals, or other printed matter used for information purposes
* routine letters of transmittal and “FYI” notes
* notices or memoranda that give only ‘timely information’, such as a change of venue or time for a meeting
* notes or working papers once a project is completed, unless it provides more complete information than the final report

Records can be unofficial or official.

**Unofficial records** can be classified as those private or personal documents that are not created or received in the course of Bermuda College’s business. **Unofficial records are not subject to his policy**.

**Official records** include correspondence, minutes, memos, architectural drawings, maps, computer data, reports, newsletters, published materials, institutional policies and procedures, financial records (including invoices, journals, ledgers, purchase orders, and other records pertaining to fiscal information). Official records can be classified by

* Subject matter category (e.g. General, Financial, Legal, Student, Personnel, Publicity/Marketing, Regulatory/Compliance, Campus Safety, Library, Institutional Research, Electronic, etc.)
* Frequency of access to the record that is required. These may be further classified as Active, Inactive, or Permanent (archival).

**Active** records are those which continue to be used by the originating administrative unit for conducting regular business, and are maintained in active office files. These official records remain active for varying periods of time depending on the purpose for which they were created.

**Inactive** records are official records that are no longer required by the originating administrative unit or other units to carry on current business and therefore are ready for final disposition.

**Permanent records**, also called archival records, are ‘records’ which have historical, administrative or research value to the College and which are intended to be kept indefinitely. The Heads of Departments/Divisions are responsible for ensuring that these records identified are true archival records, and that they are transferred to the College Archives in the Bermuda College Library once they become ‘inactive’. Examples include meeting minutes, architectural drawings, organisation charts, real estate records, endowment agreements, and photographs of events and buildings. [Extra physical storage space will need to be identified as the Library storage space is limited.]

**Essential** records are a subset of official records and contain information essential to re-establish or continue the operations of the College in the event of a disaster. Essential records are necessary to recreate Bermuda College’s legal and financial status and determine the rights and obligations of the Board, employees, donors, parents, students and alumni. Examples include personnel records, leases and contracts, land deeds, construction files, student records, accounting records, etc.

1. **Records Retention Schedule**

This is a table describing categories of records, providing the length of time they should be kept with instructions for disposition.

1. **Records Retention Period**

This is the minimum period of time for keeping records by law or institutional policy. Certain units or offices within the College may find that there are professional standards dictating best practices for records retention, (e.g. SERR or the Business Office). The Record Retention Period may be designated as “permanent”, “until superseded” (used usually to denote that the change in the revision of the documents and its transmittal to the concerned agencies has now been replaced with the newer revision), “until obsolete” (i.e. the business need ceases), or for a certain number of years or months.

1. **Records Retention Officers**

Everyone who creates records is responsible for managing those records while they are using them. Maintaining records in a safe, secure and retrievable way is the primary responsibility of the creator while the record is serving its useful purpose. The Vice President, Finance & Operations or his/her designee has ultimate responsibility for the record retention programme. An outside vendor may be contracted for record storage and destruction.

All department and committee Chairs of Bermuda College are responsible for properly managing their Official Records and may designate an employee who will be primarily responsible for compliance with this Policy. Similarly, employees, consultants and independent contractors are responsible for being familiar with the Records Retention Policy and for managing records within their possession, custody or control in accordance with this Policy.

Most records will eventually have multiple copies, possibly in various offices. There is only one ‘official copy’, and the custodian in the office holding or responsible for the ‘official copy’ is the ‘official custodian’. He/she is responsible for its retention and possible classification as an archival record. Copies of the ‘official record’ may be kept as long as they are useful. Whenever another office is designated as the ‘official custodian’ of a record, all other offices should consult with the official custodian before destroying a copy of a record that the custodian is maintaining.

1. **Record Retention**

**Financial Aid Records** – The Bermuda College Business Office shall keep original signed promissory notes and signed re-payment schedules for students on payment plans. Any imaged media format used to keep required records must be capable of reproducing an accurate, legible and complete copy of the original document, and when printed, this copy must be approximately the same size as the original.

The Registrar shall keep all education/student records in accordance with the principles set forth by the American Association of Collegiate Registrars and Admissions Officers’ Retention of Records: Guide for Retention and Disposal of Student Records. (electronic link)

Financial Aid Awards - Bermuda College shall keep records relating to the institution’s programme SEVEN YEARS after the end of an award year for which the aid was awarded and disbursed under that programme. Bermuda College must keep payment records, including records relating to adjusted and cancelled awards from the date an award is adjusted, cancelled or disbursed to the student

. Records questioned in an accounting or legal audit must be kept until the questions are resolved or until the end of the Record Retention period, whichever comes last.

**Personnel Records** – All records related to an employee shall be retained and maintained by the Human Resources Department. Departments and offices may keep duplicate copies for convenience, but all material that is kept by the department or office must be copied to the HR Department as official custodians. Students who work in jobs that are not part of their educational experience are treated as all other employees for the purposes of record keeping. However, if the job is part of an internship or work placement, their employment information is maintained as a student record with the unique obligations associated with student records.

**Academic Division Records** - Department and programme files are critical for documenting the history of the College and should be kept, managed and archived in a manner consistent with the guidelines provided in this Policy. If a department chair maintains the records in his or her own office, or on his or her own computer exclusively, the department chair is responsible for transferring all electronic and paper records to the Division administrative assistant when his or her term as chair ends. The Division’s administrative assistant is a key link in long-term maintenance of divisional and departmental records. The administrative assistant should be entrusted with knowledge of all divisional/departmental records and assist in their maintenance, even if the records are physically kept in the Dean or department chair’s office.

Records for other units, such as accounting, campus safety, legal, library and institutional records are addressed in the Retention Schedule (appendix A).

1. **Storage**

Storage areas for Inactive Records awaiting destruction or disposal must be physically secure and environmentally controlled, to protect the records from unauthorised access and damage or loss from temperature fluctuations, fire, water damage, pests, theft and other hazards. In the event of limited storage space, an external vendor can be contracted to provide such services. Active and Archival Records containing confidential or personally identifiable information should not be stored on the local hard drive or a desktop or laptop computer, floppy or zip disk, unencrypted thumb drive, CD-ROM or DVD. Instead, they should be stored on the College’s server or an encrypted electronic medium. Historic and Essential Records should be stored as hard copies in fireproof containers in a manner accessible on an as-needed basis. Electronic copies should be stored in an encrypted medium and filed in a fireproof filing cabinet.

1. **Disposition/Destruction of Records**

In the age of identity theft and data breach reporting requirements, it is important that records are disposed of in a manner that protects the College, its employees and students. Accordingly, a copy of an Official Record shall be destroyed in the same manner as the Official Record from which it originated. Official Records should be destroyed at the conclusion of the Record Retention Period outlined in this Policy.

Following the guidelines of the retention schedule, records should be securely maintained for the period of retention either in the office or department where they were created or used. Records that have been identified as ‘archival’ must be sent to College Archives for permanent retention. Records that will not be listed in the retention schedule, and therefore may be destroyed, have been identified earlier in this Policy.

All paper records that have been designated confidential or that contain confidential or personally identifiable information, and are subject to destruction, shall be shredded. All records that would pose a security risk or risk of identity theft shall be shredded. Electronic Records should be purged in a manner that ensures they are not accessible on the College server and that provides for destruction of all confidential or personally identifiable information. The Director of Information Technology can also provide assistance about proper methods of electronically purging records.

If an Official Record is to be maintained permanently as an Essential or Archival Record, it may be transferred to Archives for storage. Departments/Divisions may be required to physically preserve hard copies or digitally archive Official Records. Archival Records shall be authorised for destruction by the head of Department/Division in consultation with the Information Officer (currently the Director of Communications).

1. **Data Systems**

College-wide electronic data systems generally contain information that, if lost, corrupted, or disclosed without authorisation, could result in the impairment of business functions at the College. Some data on these systems contain private data that if lost, corrupted or disclosed without authorisation, could also result in claims involving invasion of personal privacy, loss of creditability, violation of Government laws or college contracts. These systems are general only made available to approved users. Examples include the Campus Management System/Student Information System, etc. All data in the system will have an individual responsible for the integrity of the data in the system, verifying that the data is authentic, and ensuring adherence to policies regarding access, loss prevention and security, to prevent corruption.

Bermuda College backs up its data in order to ensure business continuation in the event of a disaster or crisis. Therefore individual offices only need to retain their copies while they are useful. One notable exception involves special compilations of data that offices or departments may create using data from the SIS. Any report created from special compilations, as opposed to merely printing data from the system, should be retained by the office or department creating it as the ‘official copy’. Some administrative offices, academic divisions, or units have created electronic data systems by purchasing software to help manage a specific database for research or other purposes. If these records need to be maintained for a specific period, or permanently retained, the maintenance of the software license and the availability of it can be very important. Before purchasing or using specialised software, the official custodian should discuss the purchase and any agreement needed about backing-up the data system with the Director of IT.

1. **Electronic Mail**

Electronic mail should be treated like any other electronic record. Mail that has information that should be retained according to the Retention Schedule, should be printed and filed as would any other paper record. Even though e-mail is backed up centrally, it is not kept as a system of record. Each e-mail user is responsible for retaining e-mail containing important information. “Files” embedded in your account are NOT permanent storage and should not be used for permanent or long-term storage purposes. Saving e-mail using the “save as” function saves the content as a file, but does not save the embedded data in a regular e-mail that gives the properties of the message, such as the identity of the sender’s computer, or the route the message took before arriving in your mailbox. Saving e-mail as archived mail does preserve these properties and may be important if there is ever a dispute about the origin of the e-mail. E-mail correspondence related to contracting and other activities in which verification of the sender is important, should be archived as e-mail for the retention period.

1. **Records Related to Websites**

Websites have replaced many institution’s publications. They are a significant archival record of the College and its operation. Webmasters and others involved in maintaining the BC webpage content should capture copies of the website’s content as e-files on CD or DVD and send them to the College archives for permanent retention. What is IT’s current policy, as there is already a back-up server? Note that websites are not routinely backed up. If a website is changed without preserving the original content it cannot be retrieved from the College servers.

1. **Litigation Holds**

In the event that Bermuda College determines that litigation is likely, the College will take appropriate steps to initiate a litigation hold on relevant records so that this information can be preserved. A memo providing details of the case will be sent by the VP, Finance & Operations to the appropriate Director or Dean, and the President. Records that are subject to a litigation hold shall not be destroyed in accordance with Bermuda College’s standard destruction procedures. Such records should be immediately segregated from other records so that they are protected from routine purges. This especially holds true for e-mails or other electronic documents that may be subject to a computerised purge cycle.

Appendix A  
Record Retention Schedule

LEGEND:

* ACT = While active, employed or enrolled
* PERM = Permanent

Documents that are superseded or identified for destruction must be shredded.

| RECORD | RETENTION |
| --- | --- |
| FINANCIAL RECORDS | |
| Audited Financial Statements | PERM |
| Audit file supporting documents | 7 years |
| Financial Aid: |  |
| * Student Aid Reports/Student Information Records | 3 years from the last day of the financial award year |
| * Applications for financial aid | ACT + 3 years |
| Payroll data | 3 years |
| INSTITUTIONAL & LEGAL RECORDS | |
| Articles of Incorporation | PERM |
| Charter | PERM |
| By-Laws | PERM |
| Names/addresses of BOG | Retain until superseded |
| Minutes of Board meetings | PERM |
| Minutes of Board sub-committee meetings | PERM |
| Licenses | PERM |
| Policy Statements | 10 years |
| Contracts | ACT + 4 years |
| Bermuda College Annual Report | PERM |
| Bermuda College Catalogue | PERM |
| Accreditation | PERM |
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| LITIGATION RECORDS | |
| Court Documents/records | PERM |
| Litigation files – cases involving an action on a judgement or decree | 20 years from the date the matter is closed |
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| REGISTRAR (Admissions, enrolment, etc.) | |
| Admissions and enrolment final reports, including original targets and current enrolments | 5 years |
| Applicant files, including acceptance letters, applications/data forms, correspondence, test scores, letters of recommendation and access waivers, transcripts | 7 years after graduation or date of last attendance |
| Admission Records: Students denied admission | 3 year after application submitted |
| Admission Records: Unregistered students | 3 years after date planned to enrol |
| Student address change forms | 1 year after graduation or last date of attendance |
| Bermuda College Academic transcripts | PERM |
| Applications for admission and supporting documents | 5 years after graduation or last date of attendance |
| Test scores (entrance exam and institutional testing | 5 years after graduation or last date of attendance |
| Academic Review committee action (other than dismissal) | 5 years after graduation or last date of attendance |
| Academic Review committee action - relevant to dismissal | PERM |
| General correspondence in student file | 5 years after graduation or last date of attendance |
| Degree audit records | PERM |
| Permission to transfer credit forms | 5 years after graduation or last date of attendance |
| Request for withdrawal or leave of absence | 5 years after withdrawal or leave of absence |
| Transfer credit evaluations | 5 years after graduation or last date of attendance |
| Enrolment statistics | PERM |
| Transcript requests | 1 year after submitted |
| Final graduation lists | PERM |
| Registrations and changes in course registration (add/drop/withdrawal/audit) | 3 years after graduation |
| Applications to graduate | 1 year after graduation |
| Commencement programmes | PERM |
| Grade statistics | 10 years |
| Racial/ethnic statistics | PERM |
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| LIBRARY RECORDS | |
| Circulation records (bills and fines) | 1 year after completion of transaction |
| Catalogue of holdings | Until superseded |
| Order records | Retain 1 master; others until superseded |
| Contract and licensing related files | Retain for 5 years after expiration or final payment |
| Friends of College Library (FOCL) records | PERM |
| Reference statistics records | 4 years |
| Special projects/events/memorabilia | PERM |
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| HUMAN RESOURCE/EMPLOYEE FILES | |
| Job applications, resumes, or any other form of employment enquiry whenever submitted in response to an ad or notice of job opening, including records pertaining to failure or refusal to hire any individual | 1 year from date record made or personnel action taken |
| Records relating to promotion, demotion, transfer, selectin for training or apprenticeship, layoff, recall or discharge (through termination or resignation) of any employee | 1 year from date record made or personnel action taken, until end of employment |
| Employee evaluations | 1 year after end of employment |
| Employee contracts | PERM |
| Student Opinion Surveys | 1 year after end of employment |
| Original hiring documentation, official transcripts | PERM |
| Ads or notices relating to job openings, promotions training or opportunities for overtime work | 1 year from date record made or personnel action taken |
| Records of workplace accidents or injuries (student/employee) | 5 years after report |
| Copies of general and specific notes given to employees | ACT + 3 years |
| Employer policies and procedures | Until superseded |
| Resumes of staff hired | Until superseded or end of employment |
| Overall payroll records, including leave, beginning and end dates of each pay period, name and SSN for each employee, date/amount of wages paid for each pay period, employee information, regular rate of pay, additions, deductions, etc. | 7 years |
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| OTHER | |
| Accreditation | PERM |
| BC Journals and publications | PERM |
| Employee Code of Conduct | Until superseded |
| Faculty Handbook | Until superseded |
| Paper or electronic transcripts of meetings | Until minutes have been approved |
| Student Code of Conduct | Until superseded |
| Student Handbook | Until superseded |