Records Management Policy
Pepperdine University

1.0 Purpose and Scope of Policy
The Records Management Policy is designed to provide guidance regarding creation, preservation and security of records that should be retained for legal, operational, or historical reasons, and to encourage disposal of records that are of no further value. Refer to the Information Classification and Protection Policy for definitions of confidential and restricted information, as well as security controls that apply to records management.

Specifically, department managers should:
- Create only the records the department needs.
- Retain records according to the Records Retention Schedule.
- Maintain records in appropriate storage and locations.
- Limit access to records of confidential information on a 'need to know' basis.
- Secure access to records of restricted information (e.g. SSN, HIPAA, etc.) either by:
    - encrypting digital records
    - keeping physical records locked or supervised at all times.
- Preserve records of historical significance.
- Dispose of records no longer required in the proper manner.

The Records Management Policy applies to all University Records. Only those records created, received, or recorded outside the scope of employment are considered personal records.

2.0 Definition of University Records
Records shall mean information stored on any media (*e.g.* paper, electronic and so forth).

University records shall include all forms of recorded information created or received by officers or employees of Pepperdine University acting in the course and scope of their duties, in the course of University business or filed pursuant to the University's legal obligations. University records include but are not limited to: printed or handwritten text; moving images and photographs; sound recordings; drawings and maps; and computer data or other machine-readable electronic records. University records are the property of the University, except as prescribed in other University policies on intellectual property.

3.0 Responsibility for Management of University Records
The primary responsibility for managing the University's records rests with each department. Departments shall maintain and dispose of all University records in accordance with the "Records Retention Schedule." Although departments and offices may contract with third party commercial vendors for records storage, imaging and destruction services, each department remains ultimately responsible for the proper management of their records. In addition, each department is strongly encouraged to designate one day or a portion thereof each year to allow its employees to focus on the requirements in the Records Management Policy.

Departments with external reporting or audit requirements or which generate records that require permanent retention are encouraged to develop written procedures for complying with this policy.

4.0 Records Retention Schedule
The "Records Retention Schedule" may be referenced from the current University policies web page, and is updated annually or as needed by General Counsel. The schedule is a non-exhaustive timetable stating a recommended retention period. Where possible, it provides the legal authority for a minimum retention period. The retention periods in the timetable apply to the official record copy of certain records. The data manager will retain an official record copy, in accordance with this records management policy. Additional "convenience" copies may be retained or disposed as necessary, but shall not be retained longer than the official record copy.

The various federal and state laws may not be the only factor to consider when determining the period of time to maintain records. Other University or department policies, or contracts that Pepperdine has entered into may dictate an extended retention period. Further, University records retention may need to be extended for

operational reasons (*i.e.*, records that are needed so the user can do his or her job).

5.0 Records Storage

5.1 Physical Records Storage
When storing records in boxes or filing cabinets you should consider adequate space and accessibility, security, temperature and humidity control and damage prevention. Record storage boxes and file drawers should be clearly marked with a description or workable code that is sufficiently effective to retrieve the information later.

A third-party storage facility may be used to store records for a department so long as the storage facility is able to meet the department's operational needs and any legal requirements. All members of the University contracting with third parties must convey any relevant University information management policies to third party storage contractors, and make privacy and security obligations of those contractors enforceable by contract.

5.2 Digital Records Storage
In addition to maintaining appropriate organization and physical storage environments for digital records, departments shall arrange for backup of University digital records. This backup shall be maintained throughout their retention period, such that hardware, software, human error or other failure will not abridge the required or suggested retention period of those digital records.

Before contracting or implementing a digital records storage system involving restricted information (e.g. SSN, HIPAA, CCN, etc.), a department shall: 1) provide a written description of the restricted information and a copy of all proposed contracts or project specifications to the information security office and 2) obtain written permission to proceed.

6.0 Records Disposal
Records should be disposed of in accordance with the "Records Retention Schedule." When large quantities of records are disposed of each department is encouraged, where appropriate, to document the destruction of such records. An optional records disposal log form may be obtained as part of the "Records Retention Schedule". Digital media, computers and devices containing University Records shall be disposed of in accordance with the Information Technology Electronic Device Transfer and Disposal Standard.

7.0 Records Holds
Records otherwise due for disposal may become subject to a litigation hold or "preservation order". General Counsel shall notify departments of records that are subject to a litigation hold, and such records should not be disposed of until the hold has been lifted. Departments shall maintain records subject to a hold in such a way that they are not inadvertently disposed.

8.0 Historical Records
Some records should be maintained for historical value. The University Archive is the repository of the historical records of the University. The University Archivist is available to review records to determine their archival value and/or to provide advice regarding the necessary procedures to properly archive materials.

Revision History		
Added link in 2.0 to University Intellectual Property policies	ISO	June 2012
Updated by UMC	UMC	Mar 2012
Original Policy	UMC	Jan 2007