

POLICIES AND PROCEDURES

Department:	Archives, Information Technology Services
Subject:	Records Management and Confidential Destruction Policy
Date Issued:	June, 2001
Updated and Reviewed By:	Information Security Council - May 9, 2025
Approved By:	President's Cabinet – August 27, 2025

I. Policy

This policy sets forth guidelines for the access, maintenance, retention, and disposition of records at Luther College.

II. Purpose

The purpose of the Records Management Policy is to provide guidance for the systematic review, retention, and disposition of records received or created by Luther College in connection with the transaction of College business. This policy covers all records and documentation, regardless of format. The policy contains guidelines for how records can be accessed, how long certain records should be kept, and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations (e.g. FERPA, GLBA), to mitigate accidental or innocent destruction of records and to facilitate Luther College's operations by promoting efficiency and freeing up valuable storage space.

III. Scope

This policy applies to all offices, departments and faculty/staff of Luther College.

IV. Terms and Definitions

1. **Archives:** The Luther College Archives. The Archives is responsible for collecting, preserving and making available the history and development records of Luther College.
2. **College Archivist Librarian:** Director of the Luther College Archives. The College Archivist Librarian is responsible for identifying records of historical value for preservation and facilitating records management on campus.
3. **Inactive Records:** Records that are rarely referred to during the course of business, typically 5-7+ years old. Inactive records are usually ready to be moved from an office or network drive and into the Archives.
4. **Records:** All material on which information is recorded or preserved, regardless of format or characteristics, which is created or maintained by any agency, officer, or employee of Luther College in the transaction of its business. This definition refers to all forms of recorded information or other material bearing upon the activities and functions of Luther College, any of its officers, and employees. This definition includes but is not limited to handwritten,

- typed, or printed material; publications; photographs; moving images; sound recordings; drawings; and electronic or other machine-readable data. Not included in the definition of records as used in this policy are: faculty research or lecture notes; library materials; and materials not published by the institution.
5. **Routine Materials:** Classes of records which can be safely destroyed routinely two years after their creation without consulting the Archivist Librarian. These records include but are not limited to: physical or electronic copies of receipts, requisitions, travel vouchers, and travel expense reports (originals addressed below); most printed or electronic material received from outside the College; drafts of documents; and duplicates of reports and memos generated by your office.

V. Procedures and Guidelines

Section 1: Mandate

- The Records Management Policy and the Records Retention Schedule serve as the formal institutional policy for the retention, maintenance, and disposition of all records at Luther College, regardless of format. These documents, along with the [Records Management Program Statement](#), will be made available on the Archives' website.
- Records produced or received by any office or employee of Luther College transacting College business are the property of the institution and subject to institutional policy for retention, disposal, access, and publication, including records produced or received by individuals in administrative and committee service capacities.
- No College records shall be discarded, deleted, destroyed or transferred from the custody of the home institution or otherwise disposed of except upon the prior approval of the Archivist Librarian.
 - The Archivist Librarian shall withhold the approval for the destruction of records until satisfied that the records involved need not be retained for legal or accounting reasons, as determined by appropriate officers.
 - Approval either to transfer inactive institutional records to the Archives or to destroy them after an agreed upon period may take the form of written records disposition schedules or other written agreements between the Archivist and those responsible for the custody of these records during their active life.

Section 2: College Archives As Depository

- The Archives is the depository for non-current institutional records having enduring and significant historical or research value.
 - At least two copies of every publication issued by the College or by any of its agencies should be forwarded to the archives.
 - Records identified on the [retention schedule](#) as "permanent" should be transferred to the Archives once they become inactive.
 - For other records not listed on the retention schedule that should come to the College Archives, please consult [Appendix B: Additional Records of Archival Interest](#).

Section 3: Transferring Records to the Archives

- Faculty and staff should follow the workflows for transferring inactive records to the Archives as identified on the [Records Management Guide](#).
 - If no workflow is available, contact the College Archivist Librarian for consultation.
 - Routine materials should be removed before records are transferred.
 - The College Archivist Librarian will publicize any changes to or introduction of new workflows.
- All transfers must have a [Records Transfer Form](#) completed by the original office or department.
- All boxes in a transfer must have a [Records Transfer Cover Sheet](#) completed and attached to each box.
- The College Archivist Librarian is available to advise at any point during the transfer process.

Section 4: Access to the College Archives

- In general, the records of the College are available to any faculty or staff member who needs access in the course of their official duties.
 - All visitors are expected to comply with the usage guidelines as identified in the [Archives' Access and Use policy](#). Failure to do so will result in the forfeiture of the privilege of using the Archives.
- The College Archives is operated year-round. Employees can schedule appointments with the College Archivist Librarian to review requested records. The Archives also may provide employees with reference services, such as:
 - Searching records to locate specific pieces of information
 - Making copies of particular documents
 - Making records available for consultation in the Archives
- Any office or department may call for records they created. These records can either be duplicated for their continued use, or the original file can be temporarily borrowed or permanently de-accessioned and returned.
- Original files will only be lent out to their originating department and faculty/staff representing that department. Access to files created by other departments can be provided in person or through duplication.
- Offices and departments which transfer records to the Archives may request the return of records to the transmitting office if and when subsequent administrative need reveals their transfer to have been premature.
- Further details regarding access to the College Archives can be found in the [Archives Access and Use policy](#).

Section 5: Restrictions on Records Access

- The College Archives strives to provide as broad of access to records as possible; however, there are situations where restricting certain records is appropriate.
- Offices and departments transferring records may negotiate restrictions on access and use during the transfer process.

- The following are general records restrictions:
 - Records protected by law are only accessible to the originating department or by special permission of the President. These include all forms of personnel records.
 - Employee requests for records containing confidential information not directly relating to the requestor's work require the approval of the originating office or department.
 - Non-Luther College users are restricted from accessing records that are closed to the public. Access to these materials may be granted with the permission of the Cabinet Member governing those records.

Section 6: Records Liaison Officers

- Each office and department on campus will designate an employee as Records Liaison Officer to represent themselves to the Archives in matters of policy and assist in the implementation of the records management program.
- The Records Liaison Officer will be responsible for:
 - Coordinating records management activities within their office, including the transferring of inactive records (both electronic and physical), and confidential shredding.
 - Ensure that records are being kept by members of the office and department as required by the Records Management Policy.
 - Representing their department when reviewing records management policies and procedures.
 - Liaising between the College Archivist and office when necessary.
- While Records Liaison Officers will assist the College Archivist in coordinating records management activity, all faculty and staff are responsible for knowing and adhering to the policies put forth in this document.

Section 7: Confidential Destruction

- Confidential materials that have reached the end of their use as identified by the [Records Retention Schedule](#) shall be transferred to the Archives for destruction.
 - Employees should complete the [Confidential Shredding Form](#) and follow the transfer procedure as described in the [Records Management Guide](#).
- In order to make the most efficient use of our time and resources, only confidential material listed on the Records Retention Schedule or discussed with the Archivist Librarian should be sent for destruction. Widely-available materials, such as advertisements and publications, should be recycled.
- No electronic media should be sent to the Archives for destruction; if the item is not to be archived, employees should follow the [Electronic Media Disposal](#) policy.

Section 8: Additional Documentation

- [Appendix A: Records Retention Schedule](#)
- [Appendix B: Additional Records of Archival Interest](#)
- [Records Transfer Form](#)
- [Confidential Shredding Form](#)
- [Records Transfer Cover Sheet](#)

All departments and staff/faculty are responsible for the maintenance of records in accordance with the guidelines and procedures as set forth in this policy. The records retention schedule will be reviewed periodically by the Archivist Librarian and the appropriate departments for updates and additions. If you have any questions or comments about the information in this policy, please feel free to call the College Archivist Librarian at 563-387-1725.