

Saint Mary's College of California Document Retention and Destruction Policy

I. Introduction

Saint Mary's College of California ("Saint Mary's") is committed to effective record retention to meet legal standards, minimize the cost of record retention, optimize the use of space, and ensure that outdated records are destroyed. This Policy serves as a set of guidelines for the retention and destruction of documents and other records generated in the course of business at Saint Mary's. This policy applies to all records, whether maintained in paper copy, electronically, or in some other fashion and to all records generated by employees and staff of Saint Mary's. For the purpose of this Policy, "documents" will be used to refer to both paper and electronic records.

II. Scope

This Policy applies to all Saint Mary's documents that record an activity, administrative decision, action or outcome or other business transaction or material information related thereto.

III. Policy

It is the Policy of Saint Mary's that individual Schools, departments, offices and functional areas ("Departments") be responsible for the retention and destruction of documents generated in their respective areas, according to the individual needs of the Department and consistent with applicable retention requirements.

To the extent that different Departments have a need to maintain the identical documents, the Departments will determine among them which shall maintain the original record and which will maintain the duplicate record. The retention of duplicate records are for the convenience of the Department having a need to maintain such records and as such may follow a retention schedule suitable to the particular purpose.

This Policy serves as a framework for Saint Mary's record retention. Each Department should consult this Policy as a guideline while implementing or revising its record retention practices.

Since the appropriate time periods for record retention are subject to change, each Department should periodically review its retention practices to ensure consistency with applicable requirements.

Notwithstanding any Department's retention and destruction procedures, Saint Mary's has a duty to preserve documents when it is reasonably anticipated that there may be litigation or other reason to suspend normal destruction schedules. Any record that is relevant to pending or anticipated litigation, or that pertains to a claim, audit, agency charge, investigation or enforcement action, shall be retained at least until final resolution of the action. If faced with litigation, or anticipated or threatened litigation, a Department's normal document destruction program needs to be able to be temporarily suspended.

IV. Confidentiality

Many records subject to record retention requirements contain confidential information (e.g., social security numbers, date of birth, financial information, bank account or credit/debit card information). A Department that maintains such information must take reasonable and appropriate steps to maintain and secure confidential information in a manner as to minimize the risk of unauthorized disclosure.

V. Disposal and Destruction of Records

Documents should be retained as long as they are needed for business reasons and for the full duration of any applicable legal retention period. Once a document's retention period has passed, it may be disposed of in a secure manner. This can include but is not limited to shredding or otherwise destroying in a manner that will prevent access to confidential information and erasing or destroying electronically stored data in a manner that ensures complete destruction (e.g., moving to the "recycle" or "trash" bin does not necessarily destroy the file). Non-confidential documents and documents not containing sensitive or proprietary information can be appropriately recycled.

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