

THE TRUSTEES OF TRINITY COLLEGE
POLICY ON MANAGEMENT OF COLLEGE RECORDS

Trinity College Policy No. 11.3

Policy Statement

Trinity College recognizes that efficient, transparent, and trustworthy management of its records, regardless of their form or medium, is essential to college operations, to comply with legal and regulatory obligations, and to contribute to the preservation and curation of college history. Trinity College records shall be managed in a systematic, transparent, and legal manner, from creation through final disposition. Each department handling college records shall develop and implement processes and procedures to meet the requirements outlined in this policy.

Reason for the Policy

The purpose of this policy is to provide guidance regarding creation, storage, accessibility and protection of records that should be retained for operational, legal, or historical reasons, and for the disposal of records that are of no further value.

Definitions

Record

Record means any data or information created, received, used, recorded or filed by college employees in the course of performing official duties on behalf of the institution. Records are maintained to meet the operational, legal, and historical needs of the college. Records include evidence of college organization, functions, policies, decisions, procedures, operations, and internal or external transactions. Records can be stored on any media (e.g., paper, electronic, etc.).

Technology Resources

“Technology resources” means:

- any computer or electronic resources that are used in the search, access, acquisition, transmission, storage, retrieval, or dissemination of Trinity College data;
- any technologies or services that are owned or managed by the college, that connect to the college network, connect to another college technology or service, or store college data or information; and
- any services or applications used by the college in hosted environments in which the college does not own or operate the technology infrastructure.

Scope of Records Management

This policy applies to all records created or maintained by college employees in performing their official duties, including:

- Administrative and operational records from all college departments and locations
- Records created by teaching faculty when performing administrative roles (e.g., department chairs, program directors, or committee members)
- Records from college committees, programs, and institutional initiatives

The following materials fall *outside* the scope of this policy:

- Personal correspondence and materials of employees
- Teaching faculty's academic and professional materials, except when such materials become part of an official college record
- Individual research materials and scholarly works

Records Retention Schedule

To effectively manage its records and comply with applicable legal requirements, the college must maintain its records for specific periods of time. Records must be kept only as legally and operationally required, and obsolete records must be disposed of in a controlled manner.

The College Retention Schedule is a non-exhaustive timetable that dictates the time that a record must be maintained. The College Retention Schedule is organized by record class. Record classes are groupings of records that support similar business processes and that have related operational and legal retention requirements. Retention periods listed in the College Retention Schedule are based on law and college policy. If there is a conflict between the schedule and any other regulatory records retention requirements, the longer retention period shall apply.

Trinity College Records Management Framework

Records created or received by the college and its employees in the course of their official duties are the property of Trinity College. Through its Data Stewardship Program, the college shall develop, document, implement, and periodically update records management resources to guide the management of college records throughout their lifecycle.

Collectively, the Data Stewardship Program's Data Strategy Council (DSC) is responsible for:

- Providing guidance, support and strategic vision for records management activities at Trinity College;
- Identifying and allocating resources to support records management activities; and
- In conjunction with the Office of General Counsel and other Trinity College senior leaders, review, update, and approve revisions to the College Retention Schedule.

Collectively, the Data Stewardship Program's Data Standards and Sharing Committee (DSSC) is responsible for:

- Developing campus records management guidance related to records creation, accessibility, storage, preservation, transfer to the College Archives (see College Archives Policy), and/or destruction processes;
- Communicating, documenting, and translating key records management decisions, impacts and expectations to their respective departments; and
- Provide input to the DSC regarding the College Retention Schedule and departmental exceptions to the schedule.

Within their departments, Primary Data Stewards are responsible for:

- Maintaining a records inventory and ensuring records are stored or transferred to the College Archives (see College Archives Policy) according to the time limits prescribed by the College Retention Schedule;
- Protecting records against inappropriate access, misuse, misplacement, damage, destruction, or theft;
- Implementing departmental practices that allow for timely response to record requests;
- Conducting departmental training regarding records management practices; and
- Annually reviewing and approving the disposal of departmental records that have reached their maximum retention period.

All Data Stewards are responsible for:

- Using college data only to conduct official college business within the scope of the user's employment, affiliation with the college, or enrollment as a student and for the use of college data in accordance with applicable federal, state, and local laws and regulations, as well as in accordance with college policies, standards, and procedures;
- Following records management guidance issued by the college, including record protection and destruction guidance; and
- Promptly reporting any violations of this policy or records management guidance to their Primary Data Steward and Data Trustee.

Record Storage

The method used to store records during their retention period must guarantee that they are maintained in their original condition while providing efficient retrieval. Records must be protected to avoid unauthorized access, misuse, misplacement, damage, destruction, or theft. Library and Information Technology Services (LITS), through the agency of Information Technology Services and the College Archives, will issue guidance regarding the appropriate storage methods for records maintained within college technology resources.

It is the responsibility of individual departments, led by the Primary Data Steward for that department, to follow college policies, in effect from time to time, to ensure that appropriate protective measures are observed for maintaining official records containing personal or other confidential information.

Special Instructions for Litigation Hold

Record retention activities will be suspended when a record or group of records is placed on a litigation hold. A litigation hold requires the continued preservation of designated records under specific circumstances, such as litigation, investigations, or audits. A record's regular retention schedule is suspended when that record is subject to a litigation hold.

The Office of General Counsel (OGC) is authorized to identify and determine the records that require a hold and issue a litigation hold. The OGC shall issue written notification of a litigation hold to departments with custody of records subject to the hold. A litigation hold remains in effect until a written notification of release is provided by the OGC.

Preservation of Records of Enduring Value

Trinity College is committed to preserving its history through support and maintenance of its College Archives, which preserves and makes accessible the college's records of enduring value. The College Archivist has created guidelines regarding the definition, collection, and preservation of records with enduring historical value.

Record Disposal

Records should be disposed of when their retention period, as specified in the College Retention Schedule, has expired. All records that are ready for disposal shall be disposed of in a manner that protects the confidentiality of the information contained in the record. For example, paper records should be shredded, and digital storage media such as CDs or DVDs should be destroyed.

LITS will issue guidance regarding the appropriate disposal methods for records maintained within college technology resources.

Policy Responsibilities

The roles and responsibilities for the administration of this policy include:

President. The President of the college has general responsibility and control of all of the business and affairs of the college. The President and President's Cabinet are accountable for providing executive oversight and support of the college data stewardship program, including records management activities.

General Counsel. The General Counsel is responsible for guiding Trinity College leadership concerning records management and retention legal and regulatory requirements. General Counsel serves as the responsible officer for this policy.

Vice President for Library and Information Technology Services. The Vice President for Library and Information Technology Services serves as an executive sponsor of the college data stewardship program and is responsible for overseeing the implementation and enforcement of the college's information security program and for guiding Trinity College leadership concerning the appropriate use of technology resources.

Associate Vice President and Chief Data and Analytics Officer. The Associate Vice President and Chief Data and Analytics Officer serves as an executive sponsor of the college data stewardship program and has primary responsibility for the implementation and ongoing administration of the college data stewardship program.

Vice President of Academic Affairs and Dean of the Faculty. The Vice President of Academic Affairs and Dean of the Faculty serves as an executive sponsor of the college data stewardship program and has primary responsibility for overseeing the implementation and enforcement of all academic records at the College.

Compliance

Trinity College is committed to upholding compliance standards for the use of its technology resources and data, in alignment with all applicable laws and regulations. This includes strict adherence to the Family Educational Rights and Privacy Act of 1974 (FERPA), the Gramm-Leach-Bliley Act (GLBA), and other relevant legislation. All members of the college community are required to act responsibly and are expected to follow guidelines that ensure the security and confidentiality of college data and resources.

Responsible Officers

Vice President, Library & Information Technology Services

Key Offices to Contact Regarding the Policy and its Implementation

Questions or clarifications regarding this policy should be reported to the Vice President, Library & Information Technology Services.

Questions regarding the College Retention Schedule for specific classes of records should be directed to the leader of the indicated operational area.

Related Procedures or Forms

Guidance regarding records management:

Trinity College Retention Schedule

Trinity College Archives' Collecting Guidelines:

<https://www.trincoll.edu/lits/watkinson/collections/college-archives/trinity-college-archives-collecting-policy/>

Guidance regarding the data stewardship program:

Trinity College Data Stewardship Program SharePoint Site (authentication required)

Policy Establishing the College Data Stewardship Program

Guidance regarding data protection:

Information technology policies and procedures regarding the protection of data can be found at: <https://www.trincoll.edu/lits/technology/security/information-technology-policies-procedures/>

Effective Date of Initial Policy: April 1, 2025