POLICY

Effective Date: June 5, 2018

Authority: RCW 40.10; 40.14; 40.16; 40.20
RCW 42.56; WAC 434-600 to 663

Approved by: President Sabah Randhawa

See Also: POL-U4910.01 Managing University Archival Records

POL-U4910.03 MANAGING UNIVERSITY RECORDS

*This policy identifies and affirms existing institutional obligations relating to the identification, retention, and disposition of university records. The policy applies to all units and employees of Western Washington University and to all university records.*

Definitions:

**Recordkeeping Unit:** For the purposes of this policy, any organizational entity consisting of one or more employees whose activities are purposeful and therefore accountable through the records it creates or with which it interacts. Recordkeeping unit includes but is not limited to, departments, offices, programs, centers, institutes, boards, committees, commissions, and task forces.

**Recordkeeping Unit Authority:** A term used in this policy to identify the person organizationally responsible for one or more recordkeeping units.

**Records Coordinator:** A recordkeeping unit's designee who acts as a liaison with University Archives and Records Management (UARM) for the purpose of aligning the unit's records management practices with the requirements outlined in this policy.

**Records Disposition:** The legally-authorized actions carried out upon completion of records’ mandated retention periods. Disposition actions may include destruction/deletion or transfer to archival storage for permanent preservation.

**Records Officer:** A position required by RCW 40.14.040, and assigned to University Archives and Records Management, whose role is to supervise the institution’s records management activities and to represent the institution in all contacts with the State Records Committee and the Secretary of State’s Division of Archives and Records Management.

**Records Retention:** The controlled maintenance of records prior their legal disposition. Typically, records will have a legally-mandated retention period relating to the function for which they are created and before which they may not be disposed.

**Records System:** For the purposes of this policy, any combination of human, digital, and/or non-digital components intended to facilitate the creation, use, access, security, retention, and disposition of records and related metadata. A records system can be simple or complex, digital or non-digital. For example, the term applies equally to an individual employee's office file and to an enterprise-level information system.
State Records Committee: An independent state committee with sole legal authority to approve, modify or disapprove the recommendations on retention schedules of all files of public records held by state agencies and institutions. Established by RCW 40.14.050, the State Records Committee consists of the State Archivist, an appointee of the State Auditor, an appointee of the State Attorney General, and an appointee of the State Director of Financial Management.

University Records: As defined in public records statutes RCW 42.56.010 and RCW 40.14.010, any recorded information prepared, owned, used, or retained by any employee, recordkeeping unit as defined in this policy, or authorized proxy of Western Washington University relating to the conduct of its affairs or the performance of any institutional or proprietary function, regardless of medium, format, physical characteristics, or subject matter. This definition includes drafts and secondary copies of records. As defined in law, certain documents or records may be exempt from this policy.

1. University Records are the Property of WWU and Washington State

All university records are “public records” as defined in law and remain the property of Western as a Washington State institution. Individuals who participate in the creation or use of the records are obligated to manage them according to this policy and leave any existing records intact to their successors.

2. University Record Status is Independent of Record Format

As defined in law, university records attain public record status irrespective of their format. University records are defined by their use and context in supporting the various functions of the University, and therefore may exist in paper, digital, or other formats.

3. The University Will Account for all of its Records

By law, the University is responsible and must account for all of its public records. Accountability requires an ongoing institution-wide commitment to managing the creation, identification, retention, and disposition of all public records.

4. Only Records Retention Schedules Approved by the State Records Committee Provide Authorization for the Retention and Disposition of Public Records

The State Records Committee must approve all records retention schedules developed by the University. Only records retention schedules that have been approved by the State Records Committee can be used to dispose of public records.

5. University Archives and Records Management is Responsible for Maintaining and Publishing Approved Records Retention Schedules
University employees can only implement approved retention schedules provided by University Archives and Records Management.

6. **The Records Officer Will Coordinate the Development of the University's Records Retention Schedules and Act as Liaison to the State Records Committee**

The Records Officer will work with Records Coordinators and the University Archivist to develop retention schedules for recordkeeping units. The Records Officer will represent the University during the State Records Committee approval process.

7. **Recordkeeping Unit Authorities are Responsible for Compliance with this Policy in the Recordkeeping Units that report to them**

Recordkeeping Unit Authorities provide strategic oversight in aligning unit recordkeeping systems with the requirements set forth in this policy.

8. **The Recordkeeping Unit Authority Will Act as, or Designate, a Records Coordinator to Represent the Recordkeeping Unit in Communications With the Records Officer**

The Records Coordinator will work with University Archives and Records Management to:

- a) Inventory the recordkeeping unit's records
- b) Identify the recordkeeping unit's records retention needs
- c) Implement and carry out records retention and disposition for the recordkeeping unit's records
- d) Manage the recordkeeping unit's records.

9. **Records Systems Must Ensure the Creation and Retention of Authoritative University Records**

Records that possess the characteristics of authenticity, reliability, integrity, and usability are authoritative records.

A. **Authenticity** - An authentic record is one that can be proven to:

- a) be what it purports to be;
- b) have been created or sent by the agent purported to have created or sent it; and
- c) have been created or sent when purported.
B. Reliability- A reliable record is one:
   a) whose contents can be trusted as a full and accurate representation of the transactions, activities, or facts to which they attest; and
   b) which can be depended upon in the course of subsequent transactions or activities.

C. Integrity- A record that has integrity is one that is complete and unaltered.

D. Usability- A usable record is one that can be located, retrieved, presented and interpreted within a time period deemed sensible by stakeholders.

10. Records Systems Must Provide for Authorized, Routine, and Documented Disposition of Public Records

In order to ensure legal and accountable disposition of public records, all records systems must:

a) Ensure that an approved records retention schedule governs the retention and disposition of every university record in the system. This means that every university record in the record system must be mapped to a relevant retention and disposition authority on an approved records retention schedule.

b) Facilitate the systematic and regular disposition of university records, including methods and workflows for review, approval, reporting, recording, and auditing of dispositions (a process either managed by the system or by university employees).

c) Ensure that authoritative disposition is documented and that the documentation is retained indefinitely.