Destruction/Shredding of Confidential Documents and Records

Objective

To specify responsibilities and methods for retaining and disposing of paper and electronic documents and records that contain confidential information that if not securely maintained and destroyed in accordance with this policy, can expose security breaches to individuals and the Institution.

Overview

Russell Sage College generates, receives, and stores many documents and records of a confidential nature. If confidential documents and records are not securely maintained and periodically destroyed/shredded, there is potential danger that individuals' confidential information can be obtained and misused for illicit purposes such as identity theft; fraud; and wrongful access to facilities, materials, and information. Therefore, for the protection of all members of the College community-faculty, staff, students, donors, etc.-and for the protection of the College as an institution of higher education, this policy is hereby enacted May 1, 2007, and is applicable to the entire institution.

A. DEFINITIONS

Confidential Documents and Records

Those containing any or all of the following information:

- Social security number,
- Name and date of birth,
- Credit card number,
- Bank account number,
- Academic information regarding students identified by name and/or social security number. This includes, but is not limited to: graded exams, term papers, transcripts, class rosters, and student/team projects,
- Other information regarding students, including, but not limited to: records of disciplinary proceedings, judicial records, housing records, membership in student organizations if social security numbers are used,
- System/Programming Codes,
- Personnel records,
- Health/Mental health records,
- Donor or alumni/ae information,
- Place of birth,
- Mother’s maiden name,
- Income tax records,
- Drivers license numbers,
- Any other information considered confidential in accordance with the provisions of the Federal Educational Right to Privacy Act (Buckley Amendment), 20 USC, Section 1232 (FERPA), Health Insurance Portability and Accountability Act (HIPAA), Gramm-Leach-Bliley Act (GLBA), and other applicable state and federal legislation.

Information Guardian

The Information Guardian is typically the office manager who is most closely associated with the information. Each Information Guardian may designate one or more individuals on his or her staff to perform the below duties. However, the Information Guardian retains ultimate responsibility for their actions.

Information guardians:

- Define the collection's requirements for confidentiality, integrity and availability (see Appendix D for classifications),
- Convey the collection's requirements in writing to the managers of departments that will have access to the collection,
- Work with other managers to determine what users, groups, roles or job functions are authorized to access the information in the collection and in what manner (e.g., who can view the information, who can update the information),
- Determine when no longer needed documents can be shredded/destroyed in keeping with the College's Records Retention Schedule

Information guardians are as follows:

Information Collections Pertaining to …	Information Guardian
Students:	
The physical or mental health of any Sage student	Associate VP for Student Life for Student Wellness
Applicants	Director(s) of Admission (UG & GR)
Student academic information	Registrar
Student disciplinary/judicial information	Director of Residence Life
Faculty and Staff:	
Work-related injuries for active employees or those on long- and short-term disability	Director of Human Resources
Faculty job applicants	Provost
Administrative/staff job applicants	Director of Human Resources/Senior Officers
Current faculty and their related staff	Provost
Staff/admin (non-faculty)	Director of Human Resources/Senior Officers
Alumni and Donors:	
Alumni (personal information)	VP for Advancement
Donors	VP for Advancement
College Operations:	
Academic/Administrative department	Department chair or Dept Coordinator/ Dept Director
Community Affairs	VP for Enrollment Management
Facilities	Sr. Director of Facilities Maintenance & Planning
Financial Operations:	
General financial matters	VP for Finance & Administration
Receivables	Director of Student Accounts
Financial aid	Director of Financial Aid
Other Operations	
Public safety	Director of Public Safety
Library matters	Director of Libraries

Retention

A college record is any recorded information that is created, received, used or filed in the course of college business. Record retention guidelines are needed to ensure that the College community maintains records in accordance with all applicable legal and policy requirements. The Records Retention schedule, included at the end of this document, is intended to provide employees with information about appropriate guidelines for retention of commonly used records.

The records retention schedule should not be followed for any documents that are currently part of or are going to be part of any legal action or proceeding, litigation, subpoena, audit, or review.

Records Retention Schedule

See Appendix G for the Records Retention Policy.

B. Procedures

The Confidential Records Coordinator or other designated individual in each area should:

1. Collect and store all documents and records containing confidential information, as defined above, in a secure location within the area's building. A secure location shall be any storage area, i.e., closet, that can be securely locked and/or is supervised throughout the business day, and which is not readily accessible to persons not authorized to move about freely within the area. The records/documents have met the retention requirements set forth by the Records Retention Schedule (see Appendix G) and they are not involved in any on-going audit, litigation or academic or administrative process and/or if the document(s) or record(s) are no longer needed after having been reviewed, read or otherwise processed within a short period of time (i.e. less than one (1) eight-hour work day).

2. If any unit/area does not have a suitable location for collection and storage and receives and/or produces a relatively small amount of confidential documents or records, they may coordinate with other units in their building to identify and utilize a shared location suitable for the secure storage of confidential documents and records.

3. At the discretion of the Manager/Department head, he or she may require the Confidential Records Coordinator or other designated individual to maintain a log of confidential documents and records that are stored within a secure location and/or which are shredded.

   If such a log is required, it may contain the following:

   a. Nature of confidential documents or records (i.e. "Fall Semester, 2001, Class Rosters/Names and SSNs of Students Taking MAN3109).
   b. Form of confidential documents or records (i.e. computer print-out, report, letter, memorandum, etc.).
   c. Date that Confidential Records Coordinator or other designated individual placed confidential documents or records in the secure location.
   d. Duration of time (to exact date) that records must or should be stored.
   e. Date and method of destruction/shredding after proper documentation and approval is received.

5. In lieu of a log, an appropriate matrix sheet may be designed containing spaces for the information discussed in Section 4 a - e, above. Such matrix sheet should be affixed to the storage container and filled in at the time confidential documents and records are placed in the storage container and destroyed/shredded.

6. Confidential documents and records shall be destroyed/shredded according to the following:

a. They shall be shredded by an authorized vendor in accordance with the contract provisions between The Sage Colleges and the vendor. If an authorized vendor is utilized, the vendor shall be contacted by a designated individual, who shall arrange to have the storage containers picked up. In turn, the vendor shall either shred the records or documents on campus by use of a shredding machine within its truck, or transport the documents and records via secure truck to the vendor's off-campus shredding location.
b. When using an authorized vendor, the Colleges' designated individual shall be responsible for complying with the contract provisions in terms of vendor pick-up schedules, required storage containers, and required volume of records and documents to be shredded.
c. If destruction/shredding are completed to meet records retention requirements, the Records Disposition Document must be completed with the destruction method and date, authorized signature and witness signature.
d. The original Certificate of Destruction from the vendor will be kept on file by the Colleges' designated individual. If needed, Confidential Record Coordinators or Information Guardians can obtain a copy of the certificate from this individual for their own records.

7. Confidential records, found by any employee in a location other than where they are to be properly stored, such as in trash receptacles, recycle bins or other locations, should be brought to the attention of the employee's supervisor for further action consistent with this policy.

C. Specific Instructions for Shredding or Purging of Confidential Material

Russell Sage College reserves the right to use an appropriate vendor for shredding needs. This approved vendor will provide the routine and purge shredding needs (as outlined below).

1. Routine Shredding

    a. Routine shredding is documentation that contains confidential information that doesn't need to be retained in accordance with Appendix G. These documents shall be placed in a designated locked shredding storage container located in an area listed below.
    b. Do not place trash or documentation without confidential information in the shredding containers.
    c. When the container is 2/3rds full, contact the Maintenance Department to have your container scheduled for swapping out with an empty replacement.
    d. Do not move containers from their designated positions unless approved by the Maintenance Department.
    e. Only the Maintenance Department will call 3N to coordinate a container pick-up and swap out. Other departments and offices shall not call the company for pick-up.

2. Purge Shredding

    a. Purge shredding is when a Department or Office plans on shredding a large amount of confidential documentation at any one time. Typically this will occur once or twice a year depending on your area's specific documentation storage cycle(s).
    b. Contact the Maintenance Department to coordinate a purge pickup.
    c. Specify the number of 68 or 96 gallon containers that will be needed for this purge. This will depend greatly on your location and accessibility.
    d. On the specified date the containers will arrive in the morning.
    e. Place all documents into the containers and locate the containers as instructed by the Maintenance Department.
    f. The vendor will return in the afternoon at the coordinated time to pick up the containers.

3. General Information

    a. The designated shredding containers can be found in all of the colleges buildings.
    b. Main Shredding Contact – Physical Plant (x2253), or other designated individual as may be appointed.
    c. Changes to container location or to increase/decrease the number of containers in an area shall be coordinated through the Physical Plant.
    d. The Troy central collection site is the Hart Hall area.
    e. The Albany central collection site is the rear of the Graphic Design building.
    f. The shredding containers are locked covered 68 gallon bins with a slot on the top. They will remain locked at all times. Keys for the containers are maintained by the Physical Plant. If at any time your area needs to retrieve documentation from a container, contact the Physical Plant.
    g. Staples, paper clips, and plastic ringed bindings are allowed into the shredding containers. Color, plastic, thick or thin paper is also allowed into the containers.
    h. Remove large clips (a.k.a., binder clips or bulldog clips), heavy metal or any large amount of foreign material used to bind documentation.
    i. The Certificate of Destruction to be kept on file in the Physical Plant.

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