



Responsible Department: Enterprise Risk Management

Recommended By: Provost, SVC Business and Financial Affairs

Approved By: Chancellor

Policy Number
RISK 1.10.025

Effective Date
1/14/2022

I. INTRODUCTION

The purpose of this policy is to assist the University in complying with external record-keeping requirements, managing University risk and preserving the history of the University. The University creates, manages, and uses a wide variety of records to conduct its affairs and support its educational mission, vision, values, and goals. Recognizing this, the University has instituted this Records Management Policy and a set of supporting procedures governing the care and management of its records.

II. POLICY OVERVIEW

A. Scope

The University's Enterprise Risk Management Department will provide recommendations, procedures, and tools for the effective and efficient management of University records. This includes assisting units with properly destroying outdated records, optimizing the use of storage space, and minimizing the cost of legal discovery. The Enterprise Risk Management Department will also assist in identifying, securing, and updating the vital records that play an integral role in the daily functioning of the University. The Enterprise Risk Management Department will not mandate the creation of additional records beyond those required for compliance with the law but will assist units in the managing of whatever University records they create in the course of business.

B. Policy Statement

1. Definition of a University Record

A "record" at the University is evidence, regardless of its format, of the University's business transactions, activities, organization, or history that is created, received, recorded, or legally filed in the course of fulfilling the University's mission.

University records may include, but are not limited to, student records, personnel records, financial records, contracts, grant materials, curricula, University publications, committee meeting minutes, memoranda, and correspondence. Records created or received by faculty in administrative and University committee capacities are University records.

Records may be physical or digital, and may take the form of email, voice mail, instant messages, paper documents, photographs, video, audio, drawings, or any media that houses a University record.

Items that are not considered records include, but are not limited to, personal correspondence, reference/use copies of University records and non-University publications (magazines, journals).

The Enterprise Risk Management Department will work with units to publish records retention schedules by defining what types of information are considered University records.

2. University Records Retention Schedule

The University Records Retention Schedule will define how long records should be retained, the Office of Primary Responsibility ("OPR") for a record, and the ultimate disposition of the record: destruction or permanent retention in an archival environment. The Office of General Counsel will review schedules for compliance with all applicable statutory and regulatory requirements. As a general guideline, records containing personal data should be retained only as long as needed to comply with applicable legal requirements and as long as needed for business purposes. Personal data retained for solely archiving purposes should be retained in accordance with the principle of data minimization, which may include the use of pseudonymization.

3. Electronic University Records

University records are increasingly being created and maintained in electronic format. The University is committed to managing the most authentic, sustainable, complete, and useful version of a University record, regardless of format. Electronic records must be managed in accordance with the requirements outlined in the University Retention Schedule.

4. Ownership of University Records

University records are the property of the University of Denver and not of the University representatives who create them or to whom they are entrusted.

III. PROCESS OVERVIEW

A. Office of Primary Responsibility

The OPR is the unit that is accountable for the official/master record. Other units may have access to reference or use copies of these records, or even have created the records, but final responsibility for retention and disposition lies with the OPR. Reference or use copies of records may be kept as long as required to serve business purposes, but no longer than the retention period of the official/master record. The OPR will be listed for each record type identified in the University Records Retention Schedule.

B. Disposal of University Records

Official/master records are not to be destroyed or otherwise disposed of except in accordance with the procedures and records retention schedules established by the Enterprise Risk Management Department. When it is necessary to dispose of paper or electronic documents that contain “personal identifying information,” as defined by C.R.S. §6-1-713, such documents must be destroyed by shredding, erasing, or otherwise modifying the personal identifying information in the paper or electronic documents to make the personal identifying information unreadable or indecipherable through any means.

C. Legal Hold of University Records

There are circumstances when the normal and routine destruction of records at the University must be temporarily suspended to meet legal, audit, or investigative requirements at the University. Records that pertain to ongoing litigation, or which are reasonably anticipated to relate to foreseeable legal action, must be preserved without alteration or destruction until the legal hold is released by the Office of General Counsel.

D. Responsibility Structure

1. Oversight

Oversight of University records management is vested with the Senior Vice Chancellor of Business and Financial Affairs and the Provost and Executive Vice Chancellor (Provost). The Executive Risk and Compliance Committee provides guidance and supports the Senior Vice Chancellor of Business and Financial Affairs and the Provost regarding University records management issues.

The Enterprise Risk Management Department is responsible for establishing records management policies, procedures, and retention

schedules, and for the general day-to-day operations of the University-wide program.

The Enterprise Risk Management Department provides information, advice, and training to units regarding best practices, standards, systems requirements and design, metadata, and workflow related to University records and University records systems.

2. University Personnel

University personnel, including all University officials such as faculty, visiting faculty, staff, student workers, volunteers and others whose scope of work may include management of records, are entrusted with the day-to-day management of records in their units according to University Records Management Policy and the University Records Retention Schedule.

3. University Special Collections and Archives

The University Library's Special Collections and Archives unit oversees the long-term management of permanent University records wherever they reside and regardless of format.

IV. DEFINITIONS

1. "**Record**" – see Section II. B. 1

Revision Effective Date	Purpose
<i>6/28/2021</i>	Minor revisions
<i>1/14/2022</i>	Revision to include a reference to C.R.S. § 6-1-713 aligning policy with practice