

POLICY NO: IS-G-1.6  
POLICY NAME: Disposition/Destruction of Confidential Documents and Records  
Guidelines  
SOURCE: Office of the Vice President for Information Services  
DATE ISSUED: October 5, 2004

---

## **OBJECTIVE**

To specify the methods and responsibilities for the destruction/shredding of confidential documents and records that, if not securely maintained and destroyed/shredded in accordance with this policy, can cause irreparable harm to individuals and the University.

## **OVERVIEW**

West Chester University 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 University community-faculty, staff, students, donors, etc.-and for the protection of the University as an institution of higher education, this policy is hereby enacted immediately, and is applicable to all executive offices, divisions, colleges, schools, departments, centers, and institutes.

### ***A. DEFINITIONS***

#### **Confidential Documents and Records**

Those containing any or all of the following information:

- Anything containing a social security number.
- Anything containing a name and date of birth.
- Anything containing a credit card number or WCUID 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, housing records, membership in student organizations if social security numbers are used.
- Faculty and Staff personnel records.
- Medical records.
- Faculty and Staff disciplinary proceedings, letters or other related materials
- Any other information considered confidential in accordance with the provisions of the Federal Educational Right to Privacy Act (Buckley Amendment), 20 USC, Section 1232, and above-referenced PA Statutes and PA Administrative Code.

## **Confidential Records Coordinator**

It is recommended that each academic and administrative unit of the University, including executive offices, divisions, colleges, departments, centers, and institutes, have a Confidential Records Coordinator. The Confidential Records Coordinator shall be delegated the responsibility for collecting, storing, and destroying/shredding confidential documents and records.

## **Transitional Documents**

Transitional document(s) are documents that contained personally identifiable data, that could be readily reproduced or record(s) that are not needed after having been reviewed, read or otherwise processed within a short period of time (e.g., less than one work day). This data would include items such as screen shots, class lists, etc. It could also include M204 reports, PeopleSoft screen prints, grade sheets, etc. In short, any personnel data, student record data, medical data, disciplinary data, financial and salary data, or contract data should be treated in the manner – “When in doubt – treat it as confidential.”

## ***B. PROCEDURES***

Notwithstanding the procedures discussed with WCU Records Retention Policy, the Confidential Records Coordinator or other designated individual in each University unit should:

1. Collect and store all documents and records containing confidential information, as defined above, in a secure location within the unit's facility. A secure location shall be any storage area, i.e., closet, a cabinet, that can be securely locked, is supervised throughout the business day, and which is not readily accessible to persons not authorized to move about freely within the unit's facility.

No confidential documents or records shall be stored within any unit's secure storage facility if such documents or records are required to be stored in the State Records Management Center in accordance with the provisions of the PA Statutes, PA Administrative Code, and/or Rules of the PA Office of Administration.

2. If any unit does not have a suitable location within its facility, and receives and/or produces a relatively small amount of confidential documents or records, units 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 unit head, confidential documents and records may be destroyed by shredding by the Confidential Records Coordinator or other designated individual, without first being securely stored, if:
  - a. A shredding machine is available in the facility.
  - b. There is not enough volume of confidential documents and records to make it feasible to store them within a secure location.

4. At the discretion of the unit 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, 2004, Class Rosters/Names and SSNs of Students Taking WRT121).
  - 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 from the WCU RMLO.
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. If used, 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 (after proper documentation and approval is received from the WCU RMLO).
  6. Confidential documents and records shall be destroyed/shredded according to the following:
    - a. They shall be shredded "in-house," provided a shredder is available within the unit or building facility, and all retention requirements, as discussed previously in Sections 3 a - b above, have been met.
    - b. They shall be shredded by an authorized vendor in accordance with the contract provisions between the Purchasing Department and the vendor. If an authorized vendor is utilized, the vendor shall be contacted by the Confidential Records Coordinator or other designated individual, who shall arrange to have the storage containers picked up by designated Facilities Division Personnel. 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.

When using an authorized vendor, the Confidential Records Coordinator or other 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 is 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. If these documents do not fall under the requirements of the Records Management Program, then if deemed necessary by the unit head, documentation of destruction/shredding shall be accomplished by completing the log or matrix sheet as discussed in Section 4 e, above, or by obtaining a Certificate of Destruction from the vendor.
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. NON-SUPERSEDURE OVER EXISTING DEPARTMENTAL POLICIES AND PROCEDURES.***

It is the purpose of this policy to enact procedures for the secure storage and destruction/shredding of documents and records containing confidential information for those University units that have no policies and procedures in place.

However, this policy recognizes that certain University units deal continuously with confidential information, and already have enacted specific security and destruction/shredding policies (i.e. Public Safety, Student Health Center, Human Resources, Registrar's Office, Financial Aid, etc.).

Therefore, this policy shall not be construed to supersede the policies and procedures of University units that have developed and implemented their own specific policies for the storage and destruction of confidential documents and records unless they are less restrictive than those cited in this policy.