

Lebanese American University RECORD RETENTION & DISPOSAL POLICY

Policy Statement:

The Lebanese American University generates significant amounts of information in carrying out its activities. For effective governance of the University, it is necessary to establish a Record Retention Policy for all records created, and maintained, by the various University departments. LAU shall maintain complete, accurate, and high quality records in a secure and confidential way. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual or legal requirements, or for other purposes as stated in this Policy.

Policy Purpose:

The University is committed to effective records' retention to meet legal standards, ensure privacy, optimize the use of space, minimize the cost of record retention, and ensure that outdated records are properly destroyed or disposed of.

It is the intention of this Policy to ensure that all University records are maintained in accordance with all applicable legal and policy requirements, in order to ensure that University records are not improperly, or prematurely, disposed of by University Departments.

This Policy seeks to give guidance to University employees in achieving the following:

- Promoting the efficient management, sharing, and transfer of information among authorized University members with prescribed security standards;
- Effectively utilizing limited office space for active records, and utilizing low-cost, remote storage space for inactive records;
- Disposing of records no longer needed, as per the relevant and applicable procedures;
- Ensuring that no record is disposed of unless authorized;
- Ensuring that the means of destruction are appropriate for the type of record under consideration;
- Ensuring the preservation of records of permanent value.

Types of Records:

Records and documents outlined in this Policy include paper, electronic files, (including e-mail) and voicemail records, regardless of where the document is stored. This Policy applies to all records, regardless of their form (i.e. softcopy, hardcopy, facsimile).

Retaining of University Records:

Some University records, because of their on-going administrative or research value, should be preserved permanently. Many other records have a temporary administrative value only, and little or no research value. When no longer needed for administrative purposes, these records should be disposed of to make room for those of current and continuing value, provided there are no legal or LAU policy requirements to keep such records for a set period of time.

All records created by University officers or employees in the course of their duties, on behalf of the University, are retained for as long as they are required to meet the administrative and operational requirements of the University, after which time they are either destroyed or transferred to the University archives. The final disposition of records is carried out according to set procedures.

Departments may, at their discretion, keep the records for a longer period of time, if it is deemed necessary.

Disposal of University Records:

University records may be disposed of upon meeting the following criteria:

1. The disposal of the records complies with contractual or legal obligations.
2. The records to be disposed of do not relate to, or contain, information regarding current, pending, or potential litigation involving the University. Any questions regarding this criterion should be addressed to the Office of the Legal Counsel.
3. Records containing student information, or sensitive and/or confidential information, must be shredded, or otherwise rendered unreadable, prior to disposal.

If an employee seeks to dispose of certain University records, the employee must obtain approval, as prescribed by the applicable procedures governing that type of record.

Inquiries regarding this Policy may be directed to the Office of the General Counsel.

All records not retained as archives will then be confidentially destroyed in one of the following ways:

- a. Recycle non-confidential paper records.
- b. Shred or otherwise render unreadable confidential paper records.
- c. Redact or delete electronically stored data.
- d. Document and track the disposal process.
- e. Paper records.
- f. Erase or destroy electronically stored data.

Confidential Information:

In addition to providing for the orderly retention, and disposition, of records, the University must protect its confidential and sensitive information against accidental, or unauthorized, access, modifications, disclosures, or destruction.

Effective Date:

The foregoing Record Retention and Disposal Policy of the Lebanese American University was amended by the Board of Trustees on September 6 & 7, 2018 and approved on September 7, 2018. The Board of Trustees initially approved the Policy on September 7, 2007.

Guidelines for Procedures

Each Department utilizing this Policy should devise its own procedures to include the following:

- The type of record(s) under its custody and subject to retention.
- The period of time after which these records may be disposed of.
- The methods of retaining the records.
- The methods for disposing the records.
- If the records are to be archived, when, and how they are going to be under the custody of the relevant department (i.e. an archiving office or the head of the department developing the document).
- The forms to dispose of a record, or to send a record to the Archiving Office, should be attached to the Procedures.
- Attached to the Procedures there should also be a form to be used by the Department when a record is deemed worthy of retention beyond the legally required period of time, and the justification thereof.