



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official:
Compliance Officer
Responsible Office: Compliance Office
Last Revised Date: February 2, 2017

RECORDS MANAGEMENT

Policy Statement

Schools and divisions that maintain George Washington University (“university”) records are responsible for establishing appropriate records management processes in line with the contents of this policy.

Reason for Policy

The university is committed to effective records management that includes meeting operational needs and legal requirements for record retention and privacy protection, optimizing the use of space, minimizing the cost of record retention, and properly disposing of outdated records.

Who is Governed by this Policy

The Records Management Policy applies to all University Records. Only those records created, received, or recorded outside the scope of employment are considered personal records.

Table of Contents

Policy Statement	1
Reason for Policy	1
Who is Governed by this Policy	1
Table of Contents	1
Policy	2
Procedures	3

Related Information	3
Contacts	3
Document History	4
Who Approved This Policy	4

Policy

The university requires that its records be managed in a systematic and logical manner according to plans developed by the schools and divisions that maintain university records. The university is committed to effective records management that includes meeting operational needs and legal requirements for record retention and privacy protection, optimizing the use of space, minimizing the cost of record retention, and properly disposing of outdated records. This policy applies to all records, regardless of whether they are maintained in paper, electronically, or in some other manner.

Schools and divisions that maintain university records are responsible for establishing appropriate records management procedures. The Office of the Senior Vice President and General Counsel (“OGC”), the Division of Information Technology (“DIT”), and the Compliance Office (“Compliance”), and the University Archives (“Archives”) shall provide standards to schools and divisions for drafting appropriate procedures.

In general, procedures for schools and divisions must include, at minimum, the following considerations:

- A. Any record that contains nonpublic data should be treated in accordance with the university’s [Information Security policy](#).
- B. All university records, regardless of whether they are maintained in paper, electronically or in some other manner should be covered by the procedures.
- C. Any record that is relevant to any pending or anticipated litigation, claim, audit, agency charge, investigation or enforcement action shall be retained at least until final resolution of the matter. OGC will provide guidance on storage or destruction of any documents related to pending or anticipated litigation.
- D. Any record that may have long term historical, administrative, or archival value to the university should be covered by the procedures.

Each school and division must have its records management procedures reviewed and approved by Compliance in collaboration with OGC, DIT, and Archives. Each school and division must also identify an individual responsible for implementing the respective records management procedures. This should be an individual in a

position with sufficient knowledge and understanding of the operations and business needs of the school or division.

The University Archives is the official repository of the university with a mandated responsibility to preserve the historically valuable documentation of university units and individuals, including faculty, staff, and administrators. As such, it has the duty and authority to collect, appraise, describe, preserve, and make available university records of enduring value in compliance with appropriate laws and regulations, approved retention schedules, and University policies.

Procedures

[Implementing Procedures for Records Management](#)

Related Information

[Information Security Policy](#)

[University Records Schedule](#)

Contacts

Contact	Telephone	Email
Office of the Senior Vice President and General Counsel	202-994-6503	gwlegal@gwu.edu
Division of Information Technology	202-994-6005	ithelp@gwu.edu
Compliance Office	202-994-3386	comply@gwu.edu
University Archives	202-994-7295	archives@gwu.edu

Document History

- **Last Reviewed Date:** May 10, 2018
- **Last Revised Date:** February 1, 2017
- **Policy Origination Date:** April 30, 2004

Who Approved This Policy

Board of Trustees

Louis H. Katz, George Washington Executive Vice President and Treasurer

Beth Nolan, Senior Vice President and General Counsel

This policy, as well as all [university policies](#), are located on the [Compliance Office website](#).