

Andrews University Archives and Records Center Records Shredding Policy

All University records to be shredded must be approved by the University Archives before destruction. See applicable Records Retention Schedules. Records Retention Schedule

Purpose

The policy is to protect against the improper shredding of the Andrews University Records.

Scope

This policy applies to all Andrews University offices, departments, and other entities. It encompasses all physical records, documents, and similar materials. The records may include, but are not limited to:

- Student records (grades, transcripts, personal information)
- Employee records (payroll, benefits, performance reviews)
- Financial records (budgeting, accounting, payment history)
- Legal documents (contracts, memoranda)
- Any other document containing confidential, proprietary, or historically significant information.

Policy Statement

Andrews University is committed to safeguarding confidential, personal, proprietary, and historically significant university records by ensuring the preservation of the records that should be kept and safely destroying the physical records that are no longer needed. This includes compliance with the following:

- Family Educational Rights and Privacy Act (FERPA)
- Health Insurance Portability and Accountability Act (HIPAA)
- Fair and Accurate Credit Transactions Act (FACTA)
- General Data Protection Regulation (GDPR)
- State or local laws related to the destruction of personal information
- Requirements of accrediting bodies.

4. Definitions

- Shredding: The process of destroying paper documents by cutting them into small, unreadable pieces, ensuring that unauthorized individuals cannot reconstruct or access the information. Shredding may occur in individual offices, at a central campus location [currently Custodial Services], or by an off-campus vendor that provides shredding services.
- **Sensitive Information**: Information that, if disclosed, could harm the privacy or safety of Andrews University, organizations the University deals with, or

- individuals. This includes personal identifying information, financial details, academic records, and proprietary University data.
- Records Retention Period: The period records must be kept before they are
 eligible for disposal by shredding or permanent retention. This retention may
 be in the office of origin, the University Records Center, or the Archives. The
 Records Retention Schedules consider legal, fiscal, accreditation, and
 historical factors. The records schedules are reviewed by the Legal Counsel
 and voted on by the University Archives Committee chaired by the Chief
 Academic Officer.
- **Shredding Eligibility**: Records that meet the required retention period and are no longer needed for the university operations are eligible for shredding. Each department is responsible for monitoring and managing the timely destruction of records they no longer require.

Shredding Procedures

- 1. The office or entity with records they wish to move out [i.e., transfer or shred] of their office or storage area should contact the University Archives.
- 2. The University Archivist will review the record series to be moved. The Archivist will determine if the record series should be:
 - a. Transferred to the University Archives and Records Center,
 - b. Disposed of by the office or entity in recycle bins or other similar manner.
 - c. Transferred to Custodial Services for shredding.
- 3. Any office that wants to shred records must complete the <u>Authorization to Shred form</u>. The archivist signs the form and then returns it to the requesting office. The office should then transfer the box of records and the signed shredding form to custodial services. Please **NOTE** that Custodial Services will not shred any records without the completed form.
- 4. In all cases, protect the integrity and confidentiality of the records while they are in your office or storage area.
- 5. The University Archives and Custodial Services will also protect the integrity and confidentiality of records in their areas.

Shredding

- Either in-office, on campus, or by a service provider, records must be kept secure and confidential.
- Shredding should be thorough, ensuring that documents are rendered entirely unreadable.

Audit and Review

- The University Archivist will periodically, in cooperation with Custodial Service, audit compliance with this policy.
- This policy will be reviewed annually or whenever significant changes to data protection laws or organizational practices occur. Any changes to the policy will be communicated to all relevant personnel.

Approved by: Andrews University Archives Committee Members **Date:** 03/12/2026