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Area Administration/
Governance
(Procedures)

Chief Or Office of

Legal Affairs

Responsible Office

Records Information Management (RIM) Standard Operating Procedure

Authority for Procedure granted by UWG PL #1008, Records Information Management (RIM)

# **Authorities/Responsibilities**

The Chief Legal Officer or designee shall oversee the Record Information Management (RIM) Program to ensure the appropriate maintenance of University records. All employees are responsible for following the Records Retention Schedules, UWG's Record management procedures, and using proper and approved Forms and templates.

### Procedures 4 1

Records are maintained to provide evidence of the conformity, implementation, and effective operation of the Record Information Management (RIM) procedures and other business activities of the University. All Records must be legible, accurate, readily identifiable, and appropriately retrievable. Units are required to maintain Records (electronic or paper, if necessary) to ensure compliance with federal, state, Record Management regulations and policies by promoting the management of Records throughout their life cycle in an economical, efficient, and effective manner.

#### A. Records and Maintenance

All work activities must be documented and maintained to ensure information is identifiable, searchable, and retrievable. Unit Records may include but are not limited to:

- 1. Emails for official business
- 2. Electronic Records
- 3. Memorandums
- 4. Meeting minutes and agendas

- 5. Work plans
- 6. Records such as corrective and preventive actions, complaints & feedback, audit and assessment results, document change requests, transmittal notices, master lists, and standard operating procedures.
- 7. Personnel and training Records

### **B. Record Identification**

All University Records must be identifiable for retrieval. Records may be identified by Record series, process/product, person or event to which they pertain, dates, and contain the person and/or unit who established the Record.

# C. Recording and Error Correction

- 1. All work performed must be recorded legibly,
- 2. Electronic Records must have an audit trail to document change(s), and
- 3. Data or information must not be discarded without explanation and approval.

# D. Maintenance and Storage of Electronic Records

- 1. Electronic Records and Data files are systematically backed-up regularly to safeguard and preserve against the loss of information due to equipment malfunction, failure, catastrophe, or human error.
- 2. External labels for storage media are recommended to facilitate accurate filing and retrieval of electronic Records.
- 3. Electronic Records must be scheduled, managed, and Disposition (handled) in accordance with approved Record Retention Schedules. System controls must be in use to ensure Electronic Records are authentic, not altered or tampered with, auditable, and produced in systems that utilize security measures to ensure integrity. Security controls are in place to limit risk, mitigate loss, misuse, or unauthorized release of information.

## E. Access

- 1. Access to all Records is restricted to prevent unauthorized use or alteration of information.
- 2. Records containing sensitive or confidential information are to be secured at all times.
- 3. Electronic Records should have password, file protection, or read-only capabilities, where applicable.
- 4. Employees shall comply with all system access control standards, procedures, and requirements used in the performance of their duties.
- 5. Employees shall act ethically, take the initiative, and accept responsibility for safeguarding information resources under their control.

6. Employees shall keep alert to threats and vulnerabilities, stay abreast of security policies and issues, and report all known or suspected incidents to the appropriate contact.

#### F. Record Retention

Each unit should regularly review the current USG Records Retention Schedules and, when required, propose updates to current schedules as the needs evolve.

# **G.** Disposal of Records

After the Retention Period has expired, Records are either destroyed if authorized, or transferred to University Special Collections after receiving approval of acceptance.

## H. Violation of the Act

O.C.G.A. § 50-18-102. Records as public property; disposing of records other than by approved retention schedule as misdemeanor; a person acting under article not liable.

# A. Purpose

The purpose of this procedure is to establish a consistent, university-wide framework for creating, maintaining, accessing, and Disposing of Records in compliance with the Georgia Records Act (O.C.G.A. §§ 50-18-90 – 50-18-103) and other applicable laws. This ensures transparency, accountability, and the preservation of Public Records.

# B. Scope

This procedure applies to all University employees, departments, and units responsible for creating, receiving, managing, storing, or Disposing of University Records, regardless of format (e.g., paper, electronic, audiovisual, or other media).

# C. Roles and Responsibilities

<u>Chief Legal Officer or designee:</u> Ensures compliance with the Georgia Records Act and the University Records Management policy and associated procedures.

Records Management Officer (RMO): Oversees the University Records Management Program and provides guidance on University Records policy, Records Retention Schedules, best practices, and USG-wide compliance standards. Serves as the University's liaison with the University System of Georgia.

Information Technology Services (ITS): Ensures Electronic Records systems are secure, reliable, and regularly backed up; supports access controls, audit trails, and disaster recovery for University Records.

<u>UWG Special Collections:</u> Provides guidance on Permanent Records, transfers, and archiving in accordance with USG and University Retention policies.

<u>Office of Record - Unit, department, or division responsible for the retention and timely destruction of Official University Records and assigned to the Unit Administrator or designee.</u>

<u>Unit Administrators:</u> Oversees the proper retention and timely destruction of Official University Records within their unit, department, or division. Ensures faculty and staff comply with approved Records Retention Schedules, maintain accurate Records, and safeguard sensitive or confidential information from unauthorized access or disclosure.

Employees: Create and manage accurate, complete, and timely Records of Official activities within their respective departments, comply with Record Retention Schedules, and safeguard Public Records in their control. Employees shall act ethically, take initiative, safeguard information resources, and remain vigilant to threats. All employees are responsible for following the Records Retention Schedules, UWG's Record Management procedures, and using proper and approved Forms and templates.

## D. Record Classification

Proper identification of records is essential for effective management and compliance with the Georgia Records Act. Employees must distinguish between Non-Records, Official Records, Unofficial Records, and Personal Materials to ensure proper Retention, protection, and Disposal.

#### 1. Official Records

Final, complete, and authoritative documents retained for business, administrative, fiscal, historical, or legal purposes by the designated Office of Record. Records are considered Official once they are finalized and approved, and no further substantive changes will be made. Official Records shall be maintained for the entire retention period specified in the Records Retention Schedules.

**Examples:** final policies, procedures, reports, executed contracts or agreements, approved minutes, and budgets and financial statements.

#### 2. Unofficial Records

Drafts or duplicates of official records kept only for convenience or reference purposes. Unofficial Records may be destroyed when no longer needed for reference, provided the Official version is maintained by the Office of Record.

Examples: working drafts, duplicate copies, preliminary notes, and Informational copies.

### 3. Non-Records

Reference materials, drafts, working documents, or duplicates **not subject to Record Retention**Schedules and may be destroyed without formal authorization when no longer needed.

**Examples:** convenience copies, reference materials or publications, blank forms or templates, and personal notes.

## 4. Personal Materials

Non-business-related documents or items belonging to an individual and unrelated to University business. Employees must keep personal materials separate from University Records to prevent

<u>inadvertent disclosure or misclassification. These materials are not considered public records and are</u> excluded from this procedure.

**Examples:** Personal correspondence, photos, calendars, journals, financial or medical records, and notes.

## E. Records Creation and Maintenance

All records Records created or received in the performance of duty and paid for by public University duties and supported by Public funds are deemed public property and shall constitute a record of public acts of the State of Georgia (O.C.G.A. § 50-18-102).

The destruction of records shall occur only through the operation of an approved retention schedule. The records shall not be placed in the custody of private individuals, institutions, or semi private organizations unless authorized by retention schedules.

- <u>Creation</u>: All Records created and maintained during the course of university business must be legible, accurate, and complete to ensure records are readily searchable, identifiable, and retrievable. Each Record must be identified by:
  - Record series, process/product, or event
  - Date created or received
  - Unit or individual responsible for the Record.
- Maintenance: Records must be stored in a secure environment that protects them from unauthorized access, alteration, or destruction. Sensitive or confidential records must be protected at all times.

Electronic Records and Data files must adhere to ITS security policies and include an audit trail documenting all changes. Electronic Records and systems must include appropriate safeguards (e.g., password protection, restricted or read-only access, and file encryption) where applicable to preserve the authenticity, security, and integrity of Records by protecting them from loss, alteration, or unauthorized access. Electronic Records must be regularly backed up, clearly labeled, and managed according to approved Records Retention Schedules.

**Reporting:** Any suspected security threats or breaches must be reported immediately to the ITS Service Desk.

## **F. Records Retention**

<u>Units shall maintain Records according to the **USG Records Retention Schedules**, ensuring compliance with federal, state, and UWG requirements.</u>

- Vital Records must be identified and protected from loss, destruction, or unauthorized access.
- Record Retention Schedules may be reviewed annually and updated to reflect changes in law, university operations, or Record formats.

## **G. Records Access**

Public access to Records is governed by the Georgia Open Records Act (O.C.G.A. §§ 50-18-70 – 50-18-74). All requests must be processed in accordance with university procedure, Compliance with Georgia Open Records Act.

# **H. Records Disposition**

- 1. Authorization: Records shall only be destroyed, altered, or removed in accordance with approved USG Records Retention Schedules after the Retention Period has expired and with proper authorization from the RMO.
- 2. Destruction: Official Records must be destroyed in a secure manner that prevents unauthorized access, recovery, or reconstruction. Acceptable methods include shredding, pulping, recycling, or incineration for paper records, and degaussing, overwriting, or physical destruction for electronic records. Completion of the UWG Records Destruction Authorization Form is required prior to disposal.
- 3. Transfer: Records may be transferred to a local holding area, Records center, or the Georgia State Archives per an approved Record Retention Schedules (O.C.G.A. § 50-18-103). Records of Permanent or historical value may be transferred to University Special Collections (email special@westga.edu) after receiving approval of acceptance.

Important: Records be placed in the custody of a private individual, institution, or semi-private organization unless authorized by Records Retention Schedules.

# I. Training and Compliance

- 1. **Training**: The university shall provide training to personnel on Records Management policies and procedures. The RMO assists units in understanding and implementing USG best practices and ensures University-wide compliance.
- Audits: Units should periodically assess compliance with this procedure, the Georgia Records
   Act, and Record Retention Schedules to ensure compliance with Records Management
   policies and the Georgia Records Act.

## J. Violation of the Act

The alienation, alteration, theft, or destruction of records by any person or persons in a manner not authorized by an applicable retention schedule Unauthorized alienation, alteration, theft, or destruction of University Records is a misdemeanor misdemeanor under O.C.G.A. § 50-18-102.

No person acting in compliance with this article shall be held personally liable.

# I. Additional Guidelines Published by University Units

Any unit may publish guidelines that address these issues as they apply to the unit. In the event any

specific unit guideline(s) conflict with UWG PL #1008 or these Procedures, the latter will control.

#### J. Exclusions

Personal Materials are documentary materials belonging to an individual. Personal Materials are not government owned or used to conduct university business and therefore excluded from the legal definition of a Public Record.

Noncompliance with this procedure may result in disciplinary action, up to and including termination, in accordance with university policies.

Suspected violations or improper handling of Records must be reported immediately to the **Records**Management Officer (records@westga.edu).

# K. Unit Specific Guidelines

Units may develop supplemental procedures aligned with this University-wide procedure.

UWG Policy #1008 and this procedure supersede conflicting unit-specific guidance.

#### **Definitions**

- 1. **Data** facts about an object. A data file is a set of collected facts and is related numeric, graphical, or textual information organized in a strictly prescribed form and format.
- 2. **Disposition -** the process for removing inactive records from active storage areas for off-site records storage, management in the archives, or destruction.
- 3. **Electronic record -** information recorded in a machine-readable format (e.g., information that only a computer/machine can process and which, without a computer/machine, would not be understandable to people). These include but are not limited to electronic digital interchange, email, digital/text voice messages, instant messages, and text messages.
- 4. Form a document used to facilitate procedural implementation or document procedural objectives.
- 5. Non-records material or documents excluded from the legal definition of a (public) record, such as copies of documents kept only for the convenience of reference, extra copies of printed records or publications, and materials intended solely for reference or exhibition. Non-record documentation does not appear on a records retention schedule and may be destroyed without authorization. Non-record copies of documents are kept solely for ease of access and reference.
- 6. Office of record the unit, department, or division responsible for the retention and timely destruction of official University records and assigned to the unit's administrator or a designee.
- 7. Official record the complete (final), authoritative version, retained and required for business or legal reasons. Official records provide evidence of the University's organization, business functions, policies, decisions, procedures, operations, and internal or external transactions and reflect the University's intent to preserve such information. Official records must be retained for the entire retention period. Records are considered official when they are in their final form and held by the designated Office of Record.

- 8. **Permanent records -** records with enduring historical, administrative, or research value to the University and which the University Archivist retains, preserves, and provides access to in perpetuity.
- 9. Personal Materials anything belonging to an individual that is not used to conduct agency business.
- 10. Public Record a record open to public inspection by law or custom. According to the Open Records Act (O.C.G.A. 50-18-70), (public) records are "all documents, papers, letters, maps, books, tapes, photographs, computer-based or generated information, or similar material prepared and maintained or received in the course of the operation or a public office or agency."
- 11. **Record i**nformation created, received, and maintained as evidence and information by an organization or person in pursuance of legal obligations or the transaction of business.
- 12. Records Retention Schedules a document that describes the University's records, establishes a length of time records shall be retained and provides instructions for the disposition of records throughout their life cycle to assure records are retained for as long as necessary based on their operational, financial, legal, and continuing value.
- 13. **Retention Period -** the minimum length of time Records are to be kept for legal, regulatory, operational, or other purposes.
- 14. **Unofficial Records** records that are not required to be retained for business or legal reasons. These may include duplicates or "convenience" copies of official records that have not been annotated and may be destroyed when no longer referenced.

Data - facts about an object; organized. numerically, graphically, or textually.

**Disposition (disposing)** - removal of inactive records for storage, archival, or destruction.

<u>Electronic Record - machine-readable information (i.e., information that only a computer/machine can process and which, without a computer/machine, would not be understandable to people). Examples include but are not limited to email, digital/text messages, and instant/text messages.</u>

Form - document facilitating procedure implementation or objective.

Non-Records - reference materials or duplicate copies not subject to retention schedules. Non-record documentation does not appear on a records retention schedule and may be destroyed without authorization.

Official Record - the complete (final), authoritative version, retained for business or legal reasons.

Official records must be retained for the entire retention period. Records are considered official when they are in their final form and held by the designated Office of Record.

Permanent Records - records with enduring historical, administrative, or research value to the University.

Public Record - a record open to public inspection by law or custom. According to the Open Records Act (O.C.G.A. 50-18-70), (public) records are "all documents, papers, letters, maps, books, tapes, photographs, computer-based or generated information, or similar material prepared and maintained or received in the course of the operation or a public office or agency."

**Record -** information created, received, and maintained as evidence and information by an organization or person in pursuance of legal obligations or the transaction of business.

Records Management - the systematic control of an organization's records throughout their entire lifecycle, from creation to eventual disposal.

Retention Period - minimum length of time records must be kept for legal, regulatory, operational, or other purposes.

Retention Schedules - document defining retention periods and disposition instructions for the University's official records.

<u>Unofficial Records</u> - records that are not required to be retained for business or legal reasons. These may include duplicates or "convenience" copies of official records that have not been annotated and may be destroyed when no longer referenced.

<u>Vital Records</u> - official documents required to restore operations, meet legal obligations, and protect rights after a disaster. Examples include birth, death, and marriage certificates, contracts, legal documents, and financial or insurance records.

# **Guidelines/Related material**

- Records Information Management (RIM) Program Overview (posted on the RIM webpage)
- Records Information Management webpage

#### **Forms**

- Georgia Records Act (O.C.G.A. §§ 50-18-90 50-18-103)
- University System of Georgia Records Management Policies webpage
  - <u>Records Retention Schedules</u>
- UWG PL #1009 Legal and Regulatory Compliance
  - Legal Holds and Records Preservation
- UWG Records Information Management webpage

## **Form**

Certificate of Records Destruction
 https://www.westga.edu/administration/president/legal/rim/records-at-uwg.phpCertificate of Records Destruction

#### **Approval Signatures**

Step Description Approver Date