

Dartmouth College Records Management and Archives Access Policy

Overview

The following Records Management and Archives access policy is designed to help guide College personnel as they make decisions regarding the proper production, maintenance and long-term use of their recorded information. For the purposes of this document, a record is defined as any recorded information, regardless of format, which is generated in the course of conducting business, and which must be maintained to meet the fiscal, legal, historical or administrative needs of the College. Typical record formats would include paper, microfilm, microfiche, digital storage media (tapes, disks, optical media, etc.) and active data storage in administrative data systems.

Responsibility for Non-current College Records:

Records Management is charged with ensuring that all College record keeping systems (including both paper and digital) are designed and managed in such a way as to ensure the proper and orderly production, retention and disposition of the College's recorded information. The Records Management department maintains official physical and digital repositories for the inactive or low use records of the College, and the College Records Manager coordinates the approval of retention periods and disposition methods for all records (as defined above).

The Dartmouth College Archives is the official repository of College records with permanent and/or continuing historical value. In conjunction with Records Management, the College Archives ensures that all record keeping systems protect and maintain historically significant information.

All officers of the College whose performance of administrative duties puts them in possession of records (as defined above) shall work closely with Records Management to ensure that those records are maintained for their proper retention periods, and disposed of according to approved schedules.

All policies regarding the retention and disposition of College records are approved by the College Records Management Policy Committee. This group is chaired by the College Records Manager, and is composed of representatives from the following departments: Archives, Baker-Berry Library, Controller, Computing Services, Development, Equal Opportunity, Human Resources, Internal Audit, and Risk Management.

All officers of the College are requested to observe the following regulations:

1. The records of the official activities of all College offices and officers are the property of Dartmouth College.
2. No record material (except for working papers, notes, and other transitory and non-record documentation) should be destroyed, disposed of, or placed in unofficial storage by College personnel without the express permission and participation of the College Records Manager. If in-office destruction of official records is to be performed, the office involved must seek approval from the College Records Manager and College Archivist before proceeding.
3. All significant or substantive changes to existing record keeping systems, especially conversions from paper to digital systems, should be coordinated with the College Records Manager and

College Archivist in order to ensure that new systems adequately address retention, disposition, and enduring value requirements.

4. Each department will designate a Records Custodian, who will act as the liaison between the department, Records Management, and the College Records Management Policy Committee.
5. All parties will work through an established review process to ensure that all College retention schedules serve the administrative, fiscal, historical, and legal needs of the institution.
6. Records that are determined through the above process to have potential enduring or historical value will transfer to the control of the College Archives at the end of their approved retention periods. The College Archivist will thereupon (in consultation with the appropriate College authorities where necessary) determine which of these records have permanent historical and other research value to the College, and shall arrange for their systematic transfer to the College Archives, an appropriate records storage area, or for their disposal.
7. The College Archivist shall consult with administrative officers to determine the type of restrictions to be placed upon the use of confidential records, such as personnel records, student record, etc.
8. The President of the College may add such further regulations and directives as may be necessary or appropriate.

Records Management Access Restrictions

- a. Records with active administrative value will be stored in the College Records Management repositories whether physical or electronic. These records shall only be made accessible to those individuals within the originating department who have been approved for such access by the department's Records Custodian. Access by other College officials can be arranged on a case-by-case basis. No records under the control of Records Management are ever shared outside of these limitations, especially to those outside of the institution except as required by law.
- b. Stored records may be retrieved from the Records Management repository by authorized users, as defined above.
- c. Records Management staff will only consult the internal contents of individual files or documents in Records Management repositories when specifically requested to do so by authorized users, as defined above.

Archives Access Restrictions

- a. Physical archival records are restricted to onsite use at Rauner Special Collections Library.
- b. College archival records, other than widely distributed public documents such as catalogs, handbooks, publicity photographs, etc., will normally remain closed for a maximum period of twenty-five years from the date of their creation pursuant to the General Restrictions Statement. The opening date for access to files spanning several years will be twenty-five years from the most recent date. Access will be given to records already twenty-five years old contained within a records series that is not yet open only when such material can easily be isolated from the rest of the records series.

Records that are closed for a longer period are the following:

- i. Board of Trustees records, including committees of the Board, are closed for 50 years from date of their creation.
 - ii. Records of a sitting President are closed. The records of past administrations are closed for a period of 25 years after the President has left office.
 - iii. In accordance with The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) student records are closed for 75 years from the date of record creation or until decease of the individual, whichever comes first.
 - iv. Personnel records are closed for 75 years from date of their creation, or until decease of the individual, whichever comes first.
- c. Other records may be restricted for more than twenty-five years at the request of the office of origin per review of the Records Management Policy Committee and/or the President of the College or a Presidential designee.
- d. During the restricted period, the records will be available only to the President's Office, the office of origin, and the staff of the Archives and Special Collections. Consideration will be given for access by other offices and departments within the College to facilitate administrative functions. Researchers unaffiliated with the College may make written request for access to the College Archivist. The Archivist, in consultation with the appropriate officer in the office of origin or the appropriate College officer now responsible for the function performed by the office of origin, will determine whether access to such records will be granted.
- e. The records will be made available in accordance with the rules and regulations of the Archives, a department of the Dartmouth College Library, and Federal and State regulations.
- f. This policy will not impinge upon the normal administrative uses of College records.

General Restriction Statement

These restrictions apply even after Archives Access Restrictions expire

The Dartmouth College Archives is committed to making research records available to users on equal terms of access. This is in accordance with the standard professional policy on access adopted jointly by the Society of American Archivists and the American Library Association ([ALA-SAA Joint Statement on Access: Guidelines for Access to Original and Research Materials, 1994](#)). Equal access does not mean that all records are open to research use. It is the responsibility of the Archives to balance a researcher's needs for access with the need for confidentiality of persons and institutions whose activities are reflected in the materials. Consequently, the use of some records in the Archives, especially those of recent date, are subject to restrictions.

Two types of restrictions exist. Restrictions on access that apply to more than one group of records are termed "General Restrictions." General restrictions are applicable to particular kinds of information or designated classes of materials, wherever they may be found among the holdings. The other types of restrictions are known as "Specific Restrictions." These are restrictions specified by the transferring office or agency, or donor and apply to a specific body of material, sometimes for a specific length of time. Information about specific restrictions will be found in the deed of gift or accession record that

covers the body of records to which the specific restriction applies. It should be noted that General Restrictions supersede Specific Restrictions and may cause records that have passed out of a specific restriction to remain restricted for extended time period.

The following is a list of general restrictions that are applied to the records held by the Dartmouth College Archives.

1. Records containing information, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy or a libel of a living person.

Definition: Records containing information about a living person which reveal details of a highly personal or libelous nature which, if released, would constitute a clearly unwarranted invasion of privacy or a libel, including but not limited to information about physical or mental health or the medical or psychiatric care or treatment of the individual, and which personal information is not known to have been previously made public.

Restrictions: Such records may be disclosed only:

- i. to the staff of the Dartmouth College Archives in the performance of normal archival work on such materials and
- ii. to the named individual or her/his authorized representative, provided that access will not be granted if the records are restricted pursuant to any other general or specific restrictions and
- iii. to those officers and employees of the office or agency of origin or its successor in function who have a need for the records in the performance of their official duties.

2. Records containing confidential business and financial information.

Definition: Records which contain financial information, and particularly financial information which was obtained with an express or implied understanding of confidentiality.

Restrictions: Such information may be disclosed only:

- i. if the information consists of statistical totals or summaries and does not disclose the source of the information or identify individual parties, or
- ii. if the party with whom the confidential relationship has been established agrees to its release, or
- iii. if, in the judgment of the College Archivist, the passage of time is such that release of the information would not result in substantial harm to the parties identified in the materials, or
- iv. to those officers and employees of the office or agency of origin or its successor in function who have a need for the records in the performance of their official duties.

3. Records containing confidential employment, personnel or student information .

Definition: Records containing information on appointment, tenure, employment, performance evaluation, disciplinary action, and similar personnel matters.

Restrictions: Such information may be disclosed only:

- i. if the information is a summary statement of service, or
- ii. if the information does not identify particular individuals, or

- iii. if the individual or her/his legal representative agrees to its release, or
- iv. if the individual is deceased or the passage of time is such that the individual may be presumed to be deceased, or
- v. to researchers for the purpose of statistical or quantitative research when such researchers have provided the Archives with written assurance that the information will be used solely for statistical research or reporting and that no individually identifiable information will be disclosed.

4. Records relating to investigations.

Definition: Records containing information related to or compiled during an investigation of individuals or organizations.

Restrictions: Such information may be disclosed only:

- i. if the release of the information does not interfere with ongoing investigation, litigation or similar proceedings, and
- ii. if the confidential sources and information are not revealed, and
- iii. if confidential investigative techniques are not described.

5. Records restricted by statute, regulation, executive order, court order, or due to attorney-client or other privilege.

Definition: Records containing information, the access to which is restricted by statute, regulation, executive order, court order, attorney-client or other privilege.

Restrictions: Such information may be disclosed only:

- i. in accordance with the provisions of such statute, regulation, executive order, or court order, or
- ii. in the case of student records, to researchers for the purpose of statistical quantitative research when such researchers have provided the archives with written assurance that the information will be used solely for statistical research or reporting and that no individually identifiable information will be disclosed.
- iii. or in the case where the College elects to waive the attorney-client privilege.