

**WHEATON COLLEGE**  
**E-MAIL RETENTION POLICY**  
**May 16, 2013**

**I. PURPOSE**

Electronic mail (e-mail) has become a ubiquitous service that greatly enhances communication, both internally within the Wheaton community and externally to clients, including prospective students, current students, alumnae/i, and the public at large. Wheaton College provides e-mail accounts and makes e-mail services available to Wheaton College employees and others, for business, pedagogical, and other Wheaton College purposes ("E-Mail Services" and "Wheaton E-Mail Accounts"). These E-Mail Services are either hosted on the Wheaton College network, or are hosted by one or more service providers on provider-controlled network(s), at the direction of Wheaton College.

This policy defines responsibilities for the retention of the e-mail communications of Wheaton College employees and others within the scope of this policy. It also confirms roles and responsibilities for implementation, including management of litigation holds.

**II. SCOPE**

This retention policy applies to the following records ("Covered Records"):

- All e-mail correspondence (i) sent through; (ii) received by means of; or (iii) stored or maintained in an Wheaton E-Mail Account; and
- All files, documents, or other materials attached to such e-mail, whether in text, image, audio, video, or other format (now known or hereafter invented).

This retention policy applies to the following individuals ("Covered Individuals"):

- Wheaton College staff, including former staff members to the extent the member retains an authorized Wheaton E-Mail Account;
- Wheaton College Faculty, including former Faculty members to the extent the member retains an authorized Wheaton E-Mail Account; and
- Service providers, consultants, and other vendors to Wheaton, to the extent provided an authorized Wheaton E-Mail Account.

For convenience, this policy uses the term "e-mail" to mean Covered Records as held by Covered Individuals. In addition, for convenience this policy uses the term "employee" to refer to Covered Individuals.

### III. POLICY

#### Summary:

Wheaton College does not proactively archive e-mail messages as a function of providing e-mail services to employees and students. Employees are individually responsible for proactively archiving e-mail messages considered to be of lasting value to the College, in accordance with College records schedules.

A litigation hold directive overrides this e-mail retention policy, as well as any records retention schedules that may have otherwise called for the transfer, disposal or destruction of relevant e-mail communications, until the hold has been cleared.

#### Details:

##### Transitory Messages

Most e-mail records are created primarily for routine communication or information exchange, i.e., not as College records as defined by College Guidelines (<http://wheatoncollege.edu/rim/policies-and-guidelines/#>). These messages should be considered transitory messages that do not have *lasting value* (defined below) and should be:

- Read and promptly deleted; or
- Read and retained until their usefulness has ended and then promptly deleted.

Examples of transitory messages:

- Notices about meetings or events
- Internal requests for information
- An inquiry about department course offerings or scheduling issues
- Announcements, etc.

##### Lasting Value Messages

When the contents of an e-mail message exhibits one or more of the following characteristics, it should be classified as having lasting value:

- Has operational value (required by a department to perform its primary function), such as:
  - Administrative actions taken or planned
  - Reports or recommendations
  - Policies, procedures, guidelines, rubrics, or templates
- Has fiscal value (related to the financial transactions of the campus) and may be required for financial reporting and audits
- Has historical significance (of long-term value to document past events) (value may arise from exceptional age and/or some significant historical event)
- Has vital value (critical to maintain to ensure operational continuity after a disruption or disaster)

Vital records or information may fall into any one of the above value categories.

E-Mail often contain attachments. In considering the nature of e-mail for retention purposes, the e-mail should be considered as a whole, including any attachments to the e-mail. The retention obligations under this policy expressly apply to e-mail attachments.

E-Mail messages, attachments, records, and information with lasting value must be retained in accordance with Wheaton College retention and disposition schedules. Current records schedules can be found at the Records and Information Management website (<http://wheatoncollege.edu/rim/>).

The burden of determining whether a specific message has lasting value falls to the department responsible for that particular class or series of records – typically the originator or custodian of those records. Other recipients should not retain messages longer than required for their respective job purposes. When that need no longer exists, the information should be destroyed. In other words, only the department responsible for retention of a specific type of information or record shall store and control the disposition of information, including that which is in electronic form.

Questions about the proper classification (transitory or lasting value) of a specific message, record, or piece of information should be directed to the employee's unit head, manager, or department chair, or the College Archivist.

If an employee is merely copied on an e-mail (either listed as a "cc" or as a "bcc"), the employee is not obligated to retain that e-mail under this policy, as long as either the author or primary recipient is an employee or other individual who is subject to this policy. Those who are copied on correspondence where the author or primary recipient is subject to this policy are entitled to rely on the author or primary recipient to retain a copy of the e-mail (with attachments) in accordance with this policy. If neither the author nor primary recipient is subject to this policy, then the employee (or other individual subject to this policy) who is copied on the e-mail should retain the e-mail in accordance with this policy.

Since e-mail systems are not designed to be records retention or document management systems, e-mail messages that have lasting value should:

- Be printed and stored in the office file system with pre-assigned retention periods; and
- Not be stored within individual users' e-mail folders/files.

### Litigation Holds

When litigation is pending or threatened against the College or its employees, the College may be directed to preserve all documents and records that pertain to the issues. A litigation hold directive is issued to the legal custodians of those documents and communications. All litigation hold requests are reviewed by the Wheaton College Litigation Hold Response Team:

- Assistant Vice President and Director of Human Resources [LEAD]
- Associate Vice President for Library
- Director of Technology Infrastructure and Information Security Officer

This group is responsible for clarifying the request for document and communication preservation, implementing document and communication preservation actions and communicating with individuals named in the legal request. Activities are defined in the Wheaton College Litigation Hold Procedures.

A litigation hold directive overrides this e-mail retention policy, as well as any records retention schedules that may have otherwise called for the transfer, disposal or destruction of relevant e-mail communications, until the hold has been cleared.

Following the direction of an authorized College official, Technical Infrastructure (TI) will implement electronic e-mail archiving on designated e-mail accounts. The archiving process will be in effect from the date of implementation forward, and is implemented on individual e-mail accounts.

#### Use of Wheaton E-Mail Accounts

Each employee or other individual subject to this policy shall ensure that e-mail related to his or her employment by or services to Wheaton College ("Wheaton-Related E-Mail") reside solely in his or her Wheaton E-Mail Account, unless other College policies permit use of a non-Wheaton E-Mail Account. Even where College policy permits use of a non-Wheaton E-Mail Account, under no circumstances shall a Wheaton-Related E-Mail reside only in a non-Wheaton E-Mail Account, for example, in an employee's personal Gmail account. In sum, irrespective of other College policies, a copy of all Wheaton-Related E-Mail must reside in Wheaton E-Mail Accounts, subject to the retention requirements set out in this policy.

## **IV. ROLES & RESPONSIBILITIES**

### Technical Infrastructure (TI):

TI is responsible for provisioning and managing e-mail communications services to authorized members of the Wheaton College community, including:

Administering e-mail services and e-mail accounts;

Providing the required end user training and helpdesk support.

### College Employees:

Department heads and unit managers are responsible for providing records retention guidance to staff and faculty within their respective units. The guidance provided must be in accordance with this policy and Wheaton College Records and Information Management (RIM) Schedules (See: <http://wheatoncollege.edu/rim/>).

All Wheaton e-mail users are expected to:

- Regularly check for new messages;
- Routinely print messages with lasting value and store the messages within the departmental/office file system; and to

- Delete transitory messages as quickly as possible.

## **V. RELATED INFORMATION**

For information about Wheaton College Records and Information Management policies and practices, see: <http://wheatoncollege.edu/rim/>

For information about Wheaton College's file-sharing system, see: <http://wheatoncollege.edu/technology/locate-borrow/netspace/>

Wheaton College Litigation Hold Procedures