EHS Records Retention

1. Purpose / Background

The maintenance of an effective program for managing records is essential to ensure that the MIT Environment, Health and Safety (EHS) office continues to operate efficiently. MIT’s EHS Office recognizes that it is good business practice to retain records in a consistent, systematic and reliable manner so that they can be retrieved promptly when required for legal, regulatory, or operational reasons. Failure to keep records in a good order can result in very serious consequences for MIT, including enforcement action being taken by a regulator, reputation damage or an inability to defend or pursue litigation.

The EHS Records Management Program has been developed to provide management direction and support throughout the records lifecycle. The objectives of this program are to:
- Develop and maintain a comprehensive Records Retention Schedule.
- Observe consistent records retention and destruction practices
- Improve access to records by promoting consistency and control of records
- Manage the overhead cost associated with storage and maintenance of records by controlling the proliferation of records that have no enduring business value
- Retain appropriate records to meet legal and compliance requirements.
- Manage litigation and compliance risks associated with record keeping policies and practices
- Adhere to the MIT Records Management Policy under direction of the MIT Libraries -Institute Archives and Special Collections Department

This SOP, together with the Records Retention Schedule and the Records Management Procedures Manual, provide a framework for properly managing MIT’s EHS office records

2. Scope

The procedures specified in this SOP apply to MIT Environment, Health and Safety Office. The EHS Director and / or the Managing Director, EHS Programs must approve any exceptions.

This SOP governs all types of records created or received in the conduct of EHS Office business (See Section 10, Definitions)

For employees of MIT’s EHS Office, the terms of the Records Retention SOP are deemed to form part of an employee’s terms and conditions of employment.

This SOP shall be in conformance with MIT Policies and Procedures (#13.3 and 13.4) as administered by the MIT Libraries-Institute Archives and Special collections Department

3. Prerequisites

N/A

4. Procedures

4.1 The EHS Administrative Assistant’s Manual (sections addressing Records Management) is referenced and adopted in support of; this SOP. This manual is incorporated by reference. A basic understanding of An official hardcopy of this document exists in the EHS Office or on the EHS website. See Legal Disclaimer at: http://ehs.mit.edu/site/content/legal-disclaimer
the Records Retention Program procedures may be obtained by reading both Section 5.0, titled Roles & Responsibilities of this SOP and the brief overview which follows herein.

A brief overview of the Records Retention Program procedure is as follows:

On an annual basis (June) the Records Management Process Owner through the Records Administrator notifies the EHS Associate/Deputy Directors about the requirement to review and purge records in accordance with the EHS Office Records Retention Schedule. Through procedures specified by each Associate/Deputy Director, records are reviewed in the July / August timeframe and records identified for purging / archiving are reported to the Records Administrator.

If there is a request for a modification to the Records Retention Schedule or a request for deviation from the schedule (i.e. new records to add, request for change in retention period on a select or permanent basis, etc) the Associate/Deputy Director shall, in writing, forward this information to the Records Retention Process Owner who will review the change requests with the EHS Director. In turn the EHS Director will review change requests with the Managing Director, EHS Programs and they shall jointly approve the change and / or request a meeting of the Steering Committee.

Records identified for destruction or archiving will be handled in accordance to procedures specified in the EHS Administrative Assistant’s Manual which also adheres to procedures specified by the MIT Libraries – Institute Archives and Special Collections Department.

External requests for records may be satisfied only when authorized by the management level specified in the Records Retention Schedule.

5. Roles & Responsibilities

It is the responsibility of each individual to manage the creation, use, retention, destruction, and archiving of records effectively and efficiently under the practices specified in this SOP

5.1 Records Management Steering Committee

The Steering Committee is responsible for overseeing the EHS Office’s Records Management Program. As determined by the Managing Director, EHS Programs, the Committee may consist of representatives from EHS Programs, MIT Information Technology, MIT Legal, MIT Audit and MIT Library.
- Provides high-level management and oversight of the program
- Recommends staff and system resources
- Assures that the Records Management Program, including the Records Retention SOP and Records Retention Schedule, is properly maintained and updated.
- Provides clarification on the Policies, SOP’s and Procedures

5.2 Director, Environment, Health And Safety Office

- Authorizes and approves proposed changes to the Records Retention Program and Records Retention Schedule
- Initiates meetings of the Records Management Steering Committee
- Assures that proposed changes to the Records Retention Schedule are approved by the Institute Records Management Committee prior to authorizing implementation by the EHS Office.
- Initiates suspension of the routine destruction of records by applying a retention hold to records needed in support of ongoing audits, litigation and other events.
- Initiates the lifting of retention holds when the event is completed
- Notifies the Records Management Steering Committee of significant regulatory or Risk Management changes that necessitate a review of the Records Retention Schedule or Records Retention practices.
- Authorizes budget and resources to keep the Records Retention Program current.
- Appoints the EHS Records Management Process Owner
- Appoints the EHS Records Administrator
- Provides authority for implementation of the EHS Office Records Retention Program SOP
- Consults with Associate/Deputy Directors to ensure there are no legal holds that would prevent the scheduled destruction or transfer of records
- Decides / Approves changes in the Records Retention Schedule in agreement with the Managing Director, EHS Programs.
- Requires Associate/Deputy Directors to implement this SOP with quality and on schedule

5.3 EHS Office Records Management Process Owner
- Oversees the EHS Office Records Management practices
- Verifies that proposed changes to the Records Retention Schedule are approved by the EHS Director
- Reports opportunities for continual improvement to the EHS Director
- Works in consultation with and maintains working relationship with the MIT Libraries-Institute Archives & Special Collections department

5.4 Records Administrator:
The Records Administrator is responsible for overall records management administration. This includes coordinating and communicating requirements related to record retention practices and administering the process of transferring records to and from records storage locations. Core areas of responsibility are:
- Recommends improvements by assessing user practices and quality
- Notifies the EHS Director and Records Retention Management Process Owner of any amendments that should be made to the SOP, Records Retention Schedule, or procedures which would improve practices.
- Administers and coordinates the Records Purging process
- Supports and provides consultation to Program Associate/Deputy Directors for the purge of onsite records.
- Confirms that records are appropriately reviewed and approved for destruction by the EHS Director prior to destruction or archiving in a timely and scheduled fashion.
- Coordinates the process of applying and removing retention holds that suspend the Records Retention Schedule in the event of actual or anticipated legal action, regulatory action or audits.
- Administers the transfer and retrieval of records to and from archives while acting as the EHS liaison to the MIT Libraries.
- Assists office personnel in the practices associated with execution of this SOP (See Section 6, Training)
- Monitors for Compliance (See Section 7, Monitoring Requirements)
- Maintains and implements the Records Retention Internal practices procedures and manual

5.5 Associate Directors / Deputy Directors / EHS Service Team Leaders
Each EHS Associate Director/Deputy Director/Service Team Leader is responsible for ensuring that all affiliated records under their purview are managed in accordance with this SOP. These responsibilities include:

- Recommends duration of in-office retention and timetable for transfer of records to Records Storage
- Recommends changes to the retention schedule based on additional available information relevant to their Program or Service Team. Does not make change until approved by the EHS Director.
- Schedules and supervises purges of active records
- Ensures staff/Service Team member compliance to this SOP
- Reviews and approves the destruction of eligible records

### 5.6 Administrative Assistants

- Executes records transfer and purging as directed by the Records Administrator
- Supports the records purging/archiving process established by the Associate/Deputy Director
- Becomes knowledgeable of the Records Retention program procedures

### 5.7 Technology Services Team Leader

- Requests that IS&T purge specific records from SAP and EHS Web when so directed by the EHS Director
- Requests the purge of records from the Data Warehouse when so directed by the EHS Director

### 5.8 All EHS Personnel

- Manage the creation, use, retention, destruction, and archiving of records effectively and efficiently under the practices specified in this SOP.

### 6. Training

Personnel, who create, receive, use, or manage EHS records, shall be informed of the existence, scope, purpose, and importance of the EHS Records Management Program and related practices. New employees shall be informed of the Records Retention SOP as part of the New Employee Orientation and on an annual basis EHS staff shall receive a reminder of the requirements of this SOP. The minimum training/education shall address the following topics:

- The EHS Records Retention SOP and Practices
- EHS Records Retention Schedule
- Procedures for Inactive Records Management, Access and Security, Records Destruction, Archives and Suspension of the Retention Schedule

### 7. Monitoring Requirements

Following the annual (July/August) review and purge exercise, the Records Administrator will use the Appendix I checklist as a guideline.

### 8. Record Management

This SOP and related procedures sets the standard for EHS Records Management

### 9. References

9.1 MIT Policy and Procedure # 13.3

An official hardcopy of this document exists in the EHS Office or on the EHS website. See Legal Disclaimer at: [http://ehs.mit.edu/site/content/legal-disclaimer](http://ehs.mit.edu/site/content/legal-disclaimer)
9.2 MIT Policy on Records Management # 13.4

9.3.1 Standards
Regulatory and MIT business requirements are specified in the Records Retention Schedule, which is incorporated by reference in this SOP

9.3.2 Other SOP/ SOGs
MIT Library-Institute Archives and Special Collections Policy

9.3.3 Supplementary Documents
MIT Records Management Policy
EHS Records Retention Schedule

10. Definitions
Records: Records shall be defined as information created or received by EHS in the course of its business. They may take the form of documents, forms, reports, manuals, correspondence, files, photographs, microfilm, audiotape videotape, or electronic formats such as e-mails, spreadsheets, databases, etc.

Electronic Records: Records that contain machine-sensible or machine-readable information

E-Mail: E-mail is not a particular document type, but a delivery method for many document types

Official Records: Records containing information that is required to be retained for business or legal reasons

Unofficial Records: Records not required to be retained for business or legal reasons (i.e. published literature, books, catalogs, trade journals, reference materials etc)

Inactive Records: Records related to closed, completed, or concluded activities. Inactive records are no longer routinely referenced but must be retained in order to fulfill legal, operational, risk management or other retention requirements

Active Records: Records related to current or in-process activities. These records are typically referred to on a regular basis to respond to internal and external business requirements. (I.e. personnel files, projects in process, open invoices, etc)
APPENDIX I
Records Retention - Annual Monitoring Checklist

1) Associate/Deputy Directors were informed of the Annual Records Review / Purge exercise

Yes___ No___ Date: ______

2) Associate/Deputy Directors have verified that the annual records review / purge exercise has been completed:

   a. Biosafety Program       Yes___ No___
   b. BATES                   Yes___ No___
   c. Environmental Management Program Yes___ No___
   d. Industrial Hygiene Program Yes___ No___
   e. Radiation Protection Program Yes___ No___
   f. Reactor Radiation Protection Program Yes___ No___
   g. Safety Program          Yes___ No___

3) Hard copy records sent to inactive records storage are adequately indexed to support timely retrieval

   Yes___ No___

Issues/Comments:

4) Hardcopy records sent to inactive records storage are correctly coded per the Records Retention Schedule to permit proper destruction scheduling

   Yes___ No___

Issues/Comments:

5) Records in all forms related to pending or current legal matters are being “held” in order to PREVENT their destruction until the legal matter has been closed

   Yes___ No___

Issues/Comments:
6.) Records whose retention period has expired and that are not on “hold” are being routinely destroyed

   Yes___     No___

7.) Staff has been informed of EHS Records Retention requirements (See section 6.0 Training)

   Yes___     No___

   Issues/Comments:

8.) EHS staff has been provided the information addressed in Section 6 Training

   Yes___     No___

   Records Administrator Name: ____________________________

   Records Administrator Signature: ________________________

   Date: ___________