

Records Management Policy

Interim: (Rev. 2/22/2012)

Issued by the Archives, Library, & Special Collections Department & General Counsel's Office

Introduction

This document is an interim records management policy (the "Policy") intended as a guideline for Barnes Foundation (the "Foundation") staff to follow with regard to proper management of departmental records in anticipation of the move of certain departments to the facility on the Benjamin Franklin Parkway and more generally, until the Policy is further refined. Part 1 of the Policy includes explanations of the following: what records are, schedule and anticipated updates to the Policy, staff responsibilities for records management, and what types of records should be retained, discarded, or sent to the institutional archives for permanent retention. Part 2 of the Policy is a general institutional retention schedule that details more specifically how to manage common types of records found in most departments.

The Foundation's records are valuable assets that document its mission, activities, and operations, and it is the responsibility of all staff to manage the Foundation's records in an effective and responsible manner, consistent with applicable law and best practices. Records with lasting historic, scholarly, operational, or legal significance must be identified and preserved. If you have any questions regarding the significance of a document, please direct your inquiries, first to your department head and, if questions remain, to archives staff and/or the General Counsel, as applicable. Other records must be discarded in the manner specified herein once they are no longer needed. MUSeum

Part 1

What is a record?

A record is recorded information, regardless of medium or format. This includes paper documents (e.g., correspondence, memoranda, letters, correspondence, worksheets, notes, meeting agendas and minutes, reports, etc.), photographic prints and negatives, electronic records (e.g., digital images, word processing files, databases, spreadsheets, PDF files, etc.), audio and video recordings, and architectural plans and drawings regardless of medium, telecommunicated materials such as facsimiles and e-mail. Unless otherwise so designated, however, informal materials or transitory utility (e.g., temporary notes for internal meetings, causal or personal e-mail, facsimile transmission sheets without text messages) will not be considered records for the purposes of this policy

Institutional records are those records produced by employees, officials, volunteers, or others in the course of the operations of the Foundation that relate in any way to the institution's mission, activities, or operations.

Ownership of Institutional Records

All records created, received, or maintained by Foundation staff, volunteers, and officials during performance of their duties should be considered Foundation property, unless otherwise agreed in writing. Records created by Foundation agents or contractors, or their respective agents or subcontractors, should be considered Institutional Records, but specific provisions governing the relationship with the respective agent and/or contractor may specify otherwise. Accordingly, in these situations, please refer to the respective contract retained by the Finance Office for provisions governing ownership and confidentiality obligations.

No employee, official, or volunteer has any personal or property right to or property interest in any Foundation records, even though he or she may be named as the creator, recipient, or custodian of them.

Employees, officials, or volunteers may be allowed to remove records temporarily from the Foundation locations for the purpose of performing their duties subject to the approval of the respective department head; however, they must return such records promptly. Employees may not take any Foundation records or copies of such records when they retire, resign, or otherwise terminate employment, unless otherwise approved by the Foundation.

Role of the Archives

The mission of the Barnes Foundation Archives is to document the activities of the Barnes Foundation, its collections, and its community, as well as the personal and professional lives of its founders, Dr. Albert Barnes and Mrs. Laura Leggett Barnes. Archives staff preserve and make accessible records of all types that fall within this collecting scope.

Records management responsibilities of the archives staff include providing assistance and guidance to departments as they manage their records. <u>The archives *does not* serve as a storage facility for current or "overflow" departmental records</u> – only records designated as being appropriate for permanent archival retention can be transferred to the archives. This determination shall be made at the discretion of the archives staff.

Oversight of the Policy

The Director of the of the Foundation will oversee the implementation of this Policy – including any modification, suspension or reinstatement of all or part of the Policy – and will designate the appropriate manner in which records will be managed, retained and disposed, with the support of the archives staff, General Counsel and other executive staff. Employees should contact the Director (or such other person as the Director may designate from time to time, the "Designee") with any questions regarding implementation of this Policy or otherwise regarding the management, retention or disposition of the Foundation's records.

Records Management at the Barnes Foundation

This document is the first iteration of a formal records management policy at the Barnes Foundation. It is intended to provide general guidance for the management of institutional records; however, <u>it does not address</u> <u>every type of record, or department-specific needs</u>. Department-specific schedules will be developed in the future, and will involve collaboration between archives staff and staff from all departments. Formal staff training on subjects including general records management policies, filing techniques, email management, electronic records management, and digital image management are also planned. In the meantime, archives staff are available to address any questions staff may have, or direct questions to other resources, as necessary.

Compliance with the Records Management Policy

All departments must comply with the Records Management Policy by keeping records for the full duration of the designated retention period specified in Part 2 and destroying documents in a timely manner once the retention period has elapsed. It is the responsibility of all staff to manage, organize, store, transfer to the archives (as appropriate), and discard or destroy (as appropriate) their records. Department heads must ensure that their staff follow the guidelines outlined in the Policy, and that their respective departmental records are managed appropriately.

Preparation for the Move to the New Building

During Spring 2012, several Foundation departments and particular staff members will be assessing their departmental records in preparation for the move to the new building on the Benjamin Franklin Parkway. With this impending move it will be tempting to purge your documents as you pack up your office. However, retention of certain records may be required as a matter of law, good practice, and/or because the records may be of long-term historic value and potentially suitable for the archives.

At this time, staff should use caution in managing their records, and err on the side of retaining rather than discarding their documents. If in doubt, keep the record. Archives staff are happy to help you assess your records if there is any uncertainty.

<u>Please see the sections "Guidelines on Managing, Retaining, and Discarding Records" and "Off-site Storage and Shredding Services" below</u>, which will further detail how to sort through your records, and also how off-site storage service may be of use as you prepare for the move.

Guidelines on Managing, Retaining, and Discarding Records

For detailed information about maintaining and discarding common types of departmental records, see the General Retention Schedule in Part 2.

What to Keep / What to Discard

As a general rule, *active records* that are frequently used or updated, and are those that are referred to on a regular basis, should remain in your office for as long as they remain applicable to the Foundation's thencurrent operations. Once they are no longer used, consult the General Retention Schedule for disposition, or contact archives staff.

Routine administrative records are records that are generated by the department, used for a short period of time, and can then be discarded or destroyed. Staff may discard all routine administrative records that are no longer useful to them. Included in this type of record are all memos, letters, and other materials originating from another department, and cc'ed to you, provided copies are retained by the original department consistent with this Policy.

Records that are no longer actively used, but that are designated in the General Retention Schedule to be retained for a period of time, should remain in your office or be sent to off-site storage for the period of retention. For information regarding off-site storage availability and procedures, please see the section, "<u>Off-site Storage and Shredding Services</u>," below, and contact archives staff with any questions. It is the responsibility of all staff to identify records that must be retained, and ensure that a) they are retained for the appropriate period, and b) they are discarded or destroyed when that period has ended.

Archival records, records with long-term historic, administrative, or potential legal significance (*e.g.*, copies of contracts, opinion of counsel and other documents relating to legal matters impacting your department), should be sent to the archives when your department no longer needs them on an active basis. See "Transferring Records to the Archives," below.

Please promptly discard records according to the General Retention Schedule. Payment Card Industry (PCI) requires that all records containing credit card information should be <u>securely shredded</u> or <u>deleted when the</u> <u>transaction has been submitted for processing</u>. Records containing any other third-party personal identifying or financial information (*e.g.*, social security number) should be shredded as soon as those records are no longer needed.

Exception for Records Related to Current Litigation or Investigation

Certain federal and state laws prohibit the destruction of documents, including the deletion of emails or voicemails, which may contain information relevant to pending or ongoing investigations, litigation, and similar proceedings. Accordingly, employees who are aware of any claim, threatened claim, investigation, or legal proceedings against or involving the Foundation must notify the Director and the General Counsel so that all documents of potential relevance to the claim, proceeding or investigation can be retained for further determination by the Director or the General Counsel consistent with this Policy.

Employees should consult with the Director or the Designee (who may consult with the Foundation's legal counsel) before disposing of records that may be needed in connection with pending investigations, litigation or other disputes in which some future proceedings can reasonably be anticipated. When litigation is anticipated, the Foundation will take reasonable steps to actively preserve evidence and maintain any documents or information that may be discoverable in the litigation. Further, the Foundation may receive notice of a pending investigation or subpoena which may involve certain records. Upon receipt of such notice, the Director or the Designee will suspend any scheduled disposal of relevant documents and promptly notify employees of such suspension. In the event of anticipated or threatened litigation, the definition of the term "record" may be expanded to include even transitory documents that refer or relate in some way to the subject matter of the litigation and employees may be asked to preserve such records.

Emergency Planning

The Foundation's records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping the Foundation operating in an emergency will be duplicated or backed up on a regular basis and maintained off-site.

Administration and Compliance

The Director or the Designee will provide a copy of the Policy to all employees of the Foundation, promptly inform them of any changes hereto, and conduct periodic training and/or information sessions concerning this policy, as he or she deems necessary and appropriate. The Director will initiate and/or approve all amendments or changes to this policy.

The Director with the assistance of executive staff will review this policy periodically to determine whether it is being successfully implemented by the Foundation and for compliance with all applicable legal, tax, audit, Foundation operational requirements.

Email, Digital Images, and Electronic Records

At this time, the Barnes Foundation does not have electronic records management or digital asset management programs. Nevertheless, electronic materials, including e-mail, are to be treated in the same manner as there records of the Foundation. Employees should regularly review e-mails and delete those not covered by the Policy (*i.e.*, e-mails of only transitory value or personal in nature), preferably at least monthly. The mere retention of a document on an employee's computer system or e-mail program does not satisfy this Policy. Accordingly, the safest way to ensure preservation of electronic documents or email is to print them out and file them with related paper records, since the long-term preservation of electronic storage media is not, at this time, guaranteed. The archives does not accept records in formats it cannot read, for example, floppy disks. When in

<u>doubt, print it out!</u> If you have large numbers of digital images on your computer, please contact Visual Resources Manager Deb Lenert for assistance with the management and storage of such records.

Personal Papers

Personal papers are defined as records of a private nature that pertain solely to the private life or personal activities and interests of an individual, and that have no relation to that person's assigned duties or to the Foundation's mission, goals, objectives, operations, or activities. Personal papers are not considered institutional records, and are outside the scope of the Policy. However, some individuals who contribute significantly to the institutional official activities through personal or scholarly interests may want to consider donating papers that relate to the archives' mission. Trustees of the Barnes Foundation are encouraged to give to the archives such papers as relate to their participation in the affairs of the Foundation. If you believe that you may have personal papers of interest to the Foundation, please contact the archives staff to discuss a possible donation.

How do I destroy records?

Records that do not contain confidential information may be discarded in office recycling bins. Confidential information may include, but is not necessarily limited to any information and materials marked confidential or that should be reasonably understood by to be confidential or proprietary to the Foundation such as information or materials relating to the security, construction, or mechanical equipment of the Foundation's facilities; letters, notes, journals, memorabilia, quotations, and other writings of Dr. Albert Barnes not previously disclosed under terms restricting their further dissemination; information about the legal affairs or business affairs of the Foundation, its operations, business methods, plans and/or strategies; membership information, including personal indentifying information or any individual or corporate members; details of contracts; marketing and advertising plans and strategies; business development techniques; personnel information; information about the Board of Trustees and meetings of the Board; fundraising strategies and information; financial statements and plans; and any tangible embodiments of the foregoing in any and all media now known or hereafter developed.

Records containing Foundation confidential information should be shredded (see below) or permanently deleted from hard drives. <u>Electronic records are records, too</u>. Please destroy all records that have met their retention requirements at the same time, regardless of format.

Off-site Storage and Shredding Services

Shredding services are available for the destruction of records. A gray Iron Mountain shredding console is located in the first floor copy room in the Merion Administration Building, and in the kitchen at the Parkway Office. The contents are collected every two weeks for off-site shredding. Please place only paper in the bin.

Off-site storage is available for records that should be retained but that cannot be stored on-site in your department. Departments retain authority and control over any records that they transfer to off-site storage. In effect, off-site storage functions as an extension of departmental office space. <u>Off-site storage is not to be used as a method for avoiding sorting through your files</u>. Only files that must be retained, are not in frequent use, have been carefully reviewed by your department, and do not fit in departmental storage may be sent off site.

As part of packing for the move to the new building, departments will need to sort through their files, choose which files to bring with them, which files to shred, and which files to send to offsite storage at Iron Mountain. You will have an opportunity to tour the offices in the new building shortly, but be advised that there is limited filing cabinet space. You should, where possible, prioritize your files, digitize those items where it makes sense, and minimize the amount of paper that you bring with you to the new building. Any extra files should be assessed to see whether they should be scanned, shredded or sent offsite.

If you decide that the items should be retained and can be **sent offsite**, please follow these steps:

Step 1: Choose what files to send off site. **Appropriate files** are those that you want to keep or are required to be kept either temporarily or permanently, but that you need access to only infrequently. **Inappropriate files** to send off site are those that you need to access frequently (which you should plan to move), those that you no longer need and could be shredded (see the Records Management Policy for types of files that can be shredded), those which contain material that should be scanned so that you can have access to it or those that you don't feel like sorting through right now because you are busy.

Step 2: Find some standard file boxes (10.25" x 12" x 15.25") – these are available at both the Merion and Parkway locations. Ask Barbara Hibben or Eliza Bjorkman, or archives staff if you have difficulty locating boxes. You can also order boxes from Office Basics.

Step 3: Put your files in the boxes. Do not overcrowd them, and try to keep things organized. Do not put anything fragile in the box – Iron Mountain is not gentle.

Step 4: Make a list for yourself and your department of the contents of each box. Archives staff will not keep track of the contents of your files for you.

Step 5: Obtain some Iron Mountain "transmittal forms," available from Eliza Bjorkman or Barbara Hibben, or from archives staff, and fill them out. These forms look complicated, but once you've completed one, you'll feel much better. They look like this:

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Fill out the following fields:

Customer ID (this field is located on a detachable sticker): Our customer ID is PC582

Customer ID (located in the upper left-hand corner of the form): PC582

<u>Department ID</u>: Our current department IDs are as follows – choose the appropriate one (if you believe your department is not represented, tell Katy – we can ask Iron Mountain to add department codes):

- 100 Administration
- 200 Arboretum
- 300 Archives, Libraries, & Special Collections
- 400 Curatorial
- 500 Conservation
- 600 External Affairs
- 700 Education
- 800 Facilities
- 900 Finance
- 250 Gallery Shop

- 350 Human Resources
- 450 Registrar
- 550 Security
- 650 Visitor Services
- 750 Legal
- 850 Information Technology
- 950 Visual Resources
- 175 Publications
- 275 Building Project

Date range: Approximate dates are ok for this field.

<u>Major Description</u>: Think of a short, accurate title for this box, and write it here. Make sure it is something that will make sense to you or your colleagues in the future.

Preparer's Full Name: Your name.

Date: Today's date.

That's it! You will want to write the "SKP Box Number" (the big number on the peel-off sticker) alongside your description of this box on your list of files that you have made for yourself. This number is how Iron Mountain tracks the box, and if you have it, retrieving the box later will be much easier.

Step 6: Remove the peel-off sticker with the customer ID and stick it to the front of the box.

Step 7: Detach the three layers of the transmittal form from each other. Place the pink copy inside the box. Keep the yellow copy for yourself – we suggest that you create a centralized location for your department. Keep the white copy with the box – Iron Mountain will take this when they pick up your box(es).

Step 8: Tell Katy Rawdon or Barbara Beaucar that you have boxes for Iron Mountain to pick up, and tell them where you are located, and how many boxes you have. We are charged per pick-up, so we will try to consolidate pick-ups as much as possible. If you are located in Merion, Katy or Barbara will ask Tom and Prentice to move your boxes to the Administration Building reception area for pick up. If you are on the Parkway, please move your boxes to the lobby near the front door. Pick up can take a few days, so don't panic if your boxes stick around for a while.

If you want to retrieve a box from Iron Mountain, tell Katy or Barbara the SKP box number of the boxes you need, and they will arrange delivery. We will be working with Iron Mountain to make sure they know where all of our locations are, and where to deliver specific boxes. **Delivery can take up to 48 hours**.

Transferring Records to the Archives

Please check with archives staff before sending any records to the archives. Once transferred to the archives, records can only be used in the archives and under supervision of archives staff (although we can make you a photocopy of most items). Please also be aware that records in the archives will be accessible to *other* departments in the institution, and potentially to outside researchers as well. If you have records that belong in the archives, but which you feel should have restricted access, please discuss this with archives staff. With regard to documents relating to the legal affairs of the Foundation in your department's possession, please contact the General Counsel's Office if you have questions about applicable restrictions on public access to such documents.

It is strongly preferred that paper copies be given to the archives rather than files on magnetic media such as floppy disks or CDs given the evolving nature of electronic media. <u>If it is important, print it out. This includes e-mail.</u>

Records should be prepared for transfer to the archives in the following manner:

Step 1: Please box the records in a standard size records carton (*i.e.*, 10x12x15"). If you need boxes, please contact the archives staff and they can assist with your ordering or may be able to supply you with suitable boxes. Please keep your records in their original folders, if any.

Step 2: Please remove all hanging folders from the files. As you remove hanging folders from your files, please transfer any information written on the plastic tabs by copying the information onto a regular folder (or even a piece of paper) and inserting it between the sections in question.

Step 3: Please remove materials held together by rubber bands or plastic three-ring binders and insert into file folders.

Step 4: Whenever possible, please transfer complete groups of material relating to a specific records series, project, exhibition, etc. so the material can be processed as one unit. We strongly prefer not to receive materials in "dribs and drabs."

Step 5: Keep all materials generated by an activity or event together, including odd format items such as posters, publicity handouts, photographs, and audio recordings.

Step 6: Please provide an inventory of all folder titles for each box in a Microsoft Word document. A hard copy of the inventory for each box should also be included in the respective box.

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I have read and understand the purpose of this Policy. I understand that adherence to this Policy is a condition aneth. cation, t of my employment with the Foundation. If I do not understand something regarding this Policy, I will contact the Director or the appropriate Designee immediately for clarification, Fagree to abide by the Policy.

Employee's Signature/Date

Employee's Name (Print)

Part 2

General Retention Schedule

What is a records retention schedule?

A *records retention schedule* is a document created to (a) describe types of records and indicate how they should be handled through their "life cycle," (b) establish official retention periods and ensure timely disposition of the records according to their legal, financial, and historical value; and (c) ensure compliance with legal, financial, and other regulatory requirements of the organization.

The Barnes Foundation's General Retention Schedule provides retention guidance for commonly encountered records that are held by multiple departments. These retention schedules will be further refined for each department in the future.

What is "Office of Record"?

In most cases, when copies of documents are disseminated or cc'ed to multiple departments (such as memoranda, news releases, or schedules), the department that created the record serves as the *Office of Record* and is responsible for the retaining the "official" copy. Other departments may discard the record once it is no longer needed.

Instructions

The General Retention Schedule is formatted as a table with record series listed in successive rows. In each row, the first and second columns identify the record series by name and a brief description. The third column indicates how long a department should retain the records, and the fourth column states whether the records should be transferred to the archives after the retention period. Comments follow, including an indication of Office of Record.

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General Records Retention Schedule

Revised 2/22/2012

A = ACTIVE (Retain as Needed by Department) P = PERMANENT

General Records Retention Schedule				
Record Series	Description	Retention	Transfer to Archives	Comments
Budget files	Annual departmental budget and working files	7 yrs	No	Finance is the Office of Record
Contracts	Official contracts for goods, services, exhibitions, publications, etc.	A + 7 yrs	No Eng Group Exam	Finance is the Office of Record for all Foundation contracts, with a master list coordinated with the General Counsel's Office. See memo dated January 11, 2012 from Chenora Burkett and Brett Miller to all Foundation Staff. Departments should retain copies of final contracts for reference of performance obligations during the term of the respective agreement.
Correspondence, significant	Deals with important projects, events, departmental operations	of yrs	Yes	
Correspondence, Routine	Deals with routine administrative matters	3 yrs	No	
Financial records, general	Departmental copies of invoices, purchase orders, expense reports, receipts, price estimates, etc.	А	No	Finance is the Office of Record
Financial records, significant	Auditor's reports, annual financial statements, depreciation schedules and general ledger report	Р	No	Finance is the Office of Record
Payroll records	Annual payroll registers, benefit deduction and payment records (i.e. life insurance, disability and retirement plan contributions), W-2 reports, annual plan filing (Form 5500)	A+7	No	Finance is the Office of Record
Corporate Tax	IRS Form 990 Tax	7	Yes	Finance is Office of

General Records Retention Schedule				
Record Series	Description	Retention	Transfer to Archives	Comments
and Accounting Records	Returns, State tax filings, journal entries, invoices, cash receipts, credit card receipts, year-end trial balances			Record
Endowment	Executed gift documents that express donor commitment.	Р	Yes	Development is the Office of Record
Grant project records, funded	Departmental copies	7 yrs	No	Development is Office of Record
Grant project records, unfunded	Departmental copies	3 yrs	No	Development is Office of Record
Legal, Insurance, and Safety Records	Appraisals, construction documents, copyright and trademark registrations, licenses, environmental studies, fixed asset records, insurance policies, real estate documents, stock and bond records, leases, conflict of interest disclosure forms, committee charters, closing agreements with IRS, IRS determination letters	P (except for leases – 7 years after termination)	No (unless specified)	General Counsel's Office is Office of record (except for insurance policies, intellectual property licenses for images, stock and bond records, environmental studies)
Mailing lists	- KOL	А	No	
Meeting minutes and records, departmental (non- Board related)	Minutes, handouts, etc. for departmental meetings	7 yrs	Yes	
Board Meeting and Committee meeting minutes	Board and Board Committee Books, Agendas, Minutes, Resolutions, Consents, Reports and Presentations, Bylaws, Articles of Incorporation	A (with duplicate copies held by General Counsel and Director's Assistant)	Yes	Archives (See memo dated Oct. 16, 2011 from D. Gillman, B. Miller and K. Rawdon regarding particulars for handling Committee meeting minutes)
Memoranda, routine	Internal communications	3 yrs	No	Retain memos generated by your department only
Memoranda, significant	Internal communications	7 yrs	Yes	Retain memos generated by your department only

	General Records Retention Schedule				
Record Series	Description	Retention	Transfer to Archives	Comments	
New building project records	Files, images, architectural drawings, etc. relating to the new Parkway building	A + 5 yrs	Yes	Records considered inactive upon completion of building project. Consult with archives staff for transfer	
Personnel files, routine	Departmental copies of applications, evaluations, job descriptions, and memoranda	3 yrs after termination of employment (except for I-9 forms, which should be destroyed 1 year after termination)	No	Human Resources is the Office of Record	
Personnel files, non-routine	Benefit plan documents, employee compensation and benefit eligibility history, other records of significant incident as determined by Human Resources including determinations relation to compensation of officers and employees.	P	N EXAN	Human Resources is the Office of Record	
Photographs and digital images	Images produced by staff, vendors, or others related to Barnes Foundation collections, facilities, people, and events	S ^C A N ^C S	Yes	Visual Resources is Office of Record for digital photography. The use of such materials may implicate third-party rights or licenses with which the Foundation has entered into with third- party rights holders. Consult with Visual Resources before using any of these images.	
Policy and procedural materials	Handbooks, manuals, and training materials	А	Yes	Transfer 1 copy of all final versions to archives	
Printed material and publications, produced by the Barnes Foundation	Newsletters, reports, invitations, brochures, and other departmental or institutional publications	A	Yes	Transfer 2 copies of final version to archives	
Printed material and publications, other	Vendor catalogs, other institutions' publications, obsolete manuals, and promotional materials	А	No		

General Records Retention Schedule				
Record Series	Description	Retention	Transfer to Archives	Comments
Professional papers and presentations	Papers, lectures, and educational programming presented at the Barnes Foundation or through outside organizations	A	Consult with archives staff	
Projects, events	Files relating to events for exhibitions, fundraisers, etc.	3 yrs	Yes	
Reference/subject files, significant	Important information of lasting value, related to Barnes Foundation projects	A	Consult with archives staff	
Reference/subject files, other	Information of limited value that will be updated or replaced, or not directly related to Barnes Foundation projects	А	No Eta	

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