Records Retention Policy

Purpose

This policy establishes guidelines for retaining, managing, and disposing of the Institute's records to ensure compliance with legal and regulatory requirements, protect confidential information, and support effective record-keeping practices.

Scope

This policy applies to all financial, administrative, and student educational records generated and maintained by the Institute, including all departments, faculty, staff, and students. It encompasses both electronic and physical records.

Legal and Regulatory Compliance

This policy aligns with the Family Educational Rights and Privacy Act of 1974 (FERPA), state of Illinois regulations, and other applicable federal and state laws governing record retention and privacy.

The policy meets the DEAC standards towards accreditation for Wilmette Institute students who enroll in its credit courses and certificate programs (“students”). Although all extension students do not meet the criteria of being an academic student for all the document types listed below, the confidentiality of extension student information follows this policy.

Retention Periods

A record includes any information or data (e.g., written communications, transactions, notes, photocopies, emails, and photos) created and utilized in the operations and educational activities of the Institute’s administration, staff, faculty, and students.

Electronic Records: The majority of the Institute’s records are created and maintained electronically. Emails are stored on Institute servers for a minimum of five years. Emails stored on private computers or laptops are not retained permanently.

Financial Records: Stored for a minimum of seven years by the Director of Finance at the Finance Department, Bahá’í National Center.

Administrative Records: Stored for a minimum of ten years by the Director of the Wilmette Institute.

Student Records: Stored for a minimum of ten years by the Office of the Registrar, Admissions, and Student Services. All student transcripts are retained permanently. The retention period begins at the end of the student’s last term or upon completion of their certificate program, whichever occurs later.

Course Records: Student course records (e.g., papers and final projects) are retained in the Moodle LMS for at least three years. Following AACRAO recommendations, exams, and graded coursework are kept for one year after completion.

Records Hold: indicates a specified record cannot be sent to be disposed of due to a request from the student or legal counsel. The record will remain on hold until it is no longer needed for any ongoing issue (e.g., litigation).

- **Scanned Records:** To reduce paper storage, all paper documentation is scanned and stored.

- **Redundant records** that are not deemed necessary to be kept (e.g., duplicates) or have no value to the administrative, financial, or student record (draft documents, received marketing materials) will not be retained.

Records Archiving

Data archiving moves data that is no longer actively used to a separate storage device for long-term retention. Archive data consists of older data that remains important to Wilmette Institute and the National Spiritual Assembly beyond the legal and regulatory compliance retention period for future reference, educational or historic reasons.

Records Destruction

- Hard Copy Records: Hard copy documents are shredded after being scanned. These records are stored in a secure area until shredding occurs at the Bahá'í National Center.
- Electronic Records: Electronic files scheduled for destruction are magnetically erased. The IT Department at the Bahá'í National Center handles hard drive destruction when a computer or staff member service ends.
- Internal Audit
- An annual internal audit of all records ensures compliance with applicable federal and state laws.

Responsibility for Secured Record Access

All Institute staff and faculty are responsible for maintaining safe, secure, and retrievable records consistent with this policy. Data and student records must be protected against unauthorized access and distribution. Confidentiality must be upheld in reports just as it is for the original data.

Access to Student Records

Students may request to review their academic records electronically by emailing the Registrar. Access requires a student ID and password. The Registrar will fulfill requests within a reasonable time, not exceeding 30 days from receipt. A fee of $20 may be charged for copies of student records (e.g., transcripts, enrollment certifications). Access to copies may be denied if an administrative hold exists on the student's record, although viewing the records is permitted.

Amendment of Student Records

Students may request amendments to their records if they believe the information is inaccurate, misleading, or violates their privacy rights. Grade changes are not included. The procedure for requesting an amendment is as follows:

- Email Request: Submit a written request via email to the Registrar explaining the reason and desired outcome.
- Registrar Response: The Registrar will review the request within 30 days.
- Hearing: If necessary, the Registrar will arrange an online hearing with an impartial Institute representative. Students can present evidence and be accompanied by individuals of their choice (including an attorney, at their expense).
- Decision Notification: The student will be notified of the decision in writing within ten days of the hearing conclusion. The decision will be final and documented in the student's record if the amendment is not granted.

Grade Changes

Refer to the Wilmette Institute Grading Policies for grade changes and corrections.

Training and Awareness

All staff and faculty will receive training on the Records Retention Policy, including their responsibilities and procedures for record management. Regular updates and refresher courses will be provided as needed.

Monitoring and Reporting

Compliance with this policy will be monitored through regular audits. Any breaches or issues should be reported immediately to the Director of Wilmette Institute for corrective action.

Policy Review and Updates

This policy will be reviewed annually and updated to reflect changes in legal requirements or Institute practices. Updates will be communicated to all stakeholders promptly.

Roles and Responsibilities

- Director of Finance: Manages financial records and ensures their retention for at least seven years.
- Director of Wilmette Institute: Manages administrative records and ensures their retention for at least ten years.
- Registrar: Manages student records, including transcripts, with a retention period of at least ten years.
- Archives Department: Stores all electronic records for historical purposes.
- IT Department: Responsible for electronic records destruction and hard drive disposal.

Data Security and Privacy

All records must be protected using encryption, secure access controls, and confidentiality agreements. Physical records should be stored in locked, secure areas, and electronic records must be protected against unauthorized access.

Record Classification

Records are categorized into financial, administrative, student, and course records. Each category follows specific retention and destruction guidelines to ensure proper management.

Disposal Authorization

Authorization for the destruction of records must be obtained from the relevant department head (e.g., Director of Finance, Registrar, IT Department) before proceeding with disposal.

Complaints

If a student feels their rights have been violated, after exhausting all internal remedies available within the Institute, written complaints can be filed with the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, D.C. 20202-4605.