



Approving University Official(s): Provost, Chief Operating Officer, and Chief Financial Officer

Responsible Office: University Compliance Office

Effective date: November 14, 2025

Next review date: September 1, 2026

RETENTION OF UNIVERSITY RECORDS

Policy Statement

Northwestern University and various federal and state laws require that different types of records be retained for specific periods of time. The University has designated official repositories and a retention schedule for maintenance of these records. These records should be managed according to procedures that are outlined in this document.

Purpose

The University is committed to effective records retention to meet business needs, preserve its history, comply with legal standards, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed.

Audience

All Deans, Directors, Department Heads and administrative staff responsible for maintenance of University records.

Definitions

Archivist	An individual with responsibility for management and oversight of an archival repository of records.
Official Repository	The office/department listed on the Records Retention Schedule that is responsible for maintaining Official Records.
Permanent Records	A Record that by virtue of the importance of the information it contains should be retained in perpetuity by the University.
Record	Recorded information of any kind and in any form including writings, drawings, graphs, charts, images, prints, photographs, microfilms, audio and video recordings, data and data compilations, and electronic media, including e-mail.

Official Record	An official record is any record that is designated by appropriate decision makers as the definitive (or “official”) copy of a record maintained by the Official Record Repository, and functions (legally or otherwise) as evidence of official actions, decisions, or compliance within institutional policies.
Records Retention Schedule	A descriptive schedule that provides a guideline for the minimum length of time that Official Records should be retained before they are deleted/destroyed or placed in archival preservation.
Retention Period	The length of time an Official Record must be kept before it should be deleted/destroyed or placed in archival preservation.
University Archives	The repository, housed in the Charles Deering McCormick Library, for permanent, non-current Records of enduring value.

Additional definitions relating procedures for using and understanding the Records Retention Schedule can be found in the [Key Terms and Fields Guide](#).

Policy Implementation

University Records Management Program

The primary reasons for retaining Records are that they are required for business or legal purposes or they have enduring value.

This Records Retention Schedule is a guideline that sets forth the minimum length of time that Official Records should be retained by the Official Repository. The schedule allows the University to meet its business and legal needs, and to optimize the use of space, minimize the cost of record retention, and ensure that outdated or useless Records are deleted/destroyed. Offices/departments should review their retention practices with the office/department identified as the Official Repository.

Record Preservation: Record retention periods for selected Records may be increased for various reasons including government regulation, judicial or administrative orders, contracts, pending or threatened litigation or audit requirements. Such changes in the Records Retention Schedule supersede the requirements listed in this schedule. Suspension of records destruction required for any reason will typically be accomplished by a notice sent out to affected units by the office requesting the modification to the Retention Schedule (e.g. Office of General Counsel, University Compliance Office, Office for Research Integrity, etc.). Upon receipt of instructions directing the preservation of Records, employees in the affected department are responsible for ensuring that the Record Retention Schedule is suspended and that Records are not altered or deleted/destroyed until further instruction.

Records Management: When needed, the University Archivist provides advice as to what non- current records of enduring value should be transferred to the Northwestern University Archives at the Charles Deering McCormick Library. An office/department’s archival records may be transferred to the University Archives following these procedures:

<http://www.library.northwestern.edu/archives/donor.html>

University Records Disposal

Official Records for which there is a retention requirement in the Retention Schedule are recommended to be deleted/destroyed by the Official Repository when they have reached the conclusion of their retention period *unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.*

Offices/departments other than the “official repository” should delete/destroy any duplicate records promptly *unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.*

Records for which there is no retention requirement in the Retention Schedule should be deleted/destroyed promptly *unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.*

Records should be deleted/destroyed in ways commensurate with their confidentiality and with methods which do not permit recovery, reconstruction or future use of confidential information. For example:

Paper records containing confidential information (such as personally identifiable information) should be shredded, not placed in recycle bins and not simply thrown out with other classes of records or with miscellaneous trash.

Electronic or machine readable records containing confidential information should be deleted/destroyed through thorough degaussing, multiple overwrites, or physical destruction of drives, disks, tapes or other magnetic or electronic storage media to ensure proper destruction. It is the responsibility of the office/department or individual in possession of a University owned computer(s) to ensure that data has been properly removed from the hard drives of computers before removal or redeployment by one of the following two methods:

For computers that are **slated to be removed** from University ownership, utilize University Services' Computer & Peripherals Recycling Program to handle the proper removal of data and recycling of hardware
<http://www.northwestern.edu/userservices/office/computer/index.html>.

For **computer redeployment** within the University or for disposal not by University Services, follow the *Disposal of Northwestern University Computers Policy*
<http://www.it.northwestern.edu/policies/disposal.html>.

Film, audio, recording and videotapes containing confidential information should be physically destroyed, not simply thrown away. It is possible to overwrite audio and videotapes with other, non-confidential sound and images, but if this is done, it is recommended that it be done by an authorized member of the staff in the office that originated the records.

Destruction performed by vendors shall be subject to the same procedures as those which are described in this policy and which apply to all University employees.

E-Mail

E-mail should be handled as any other Record in terms of retention and disposal.

Related Information

Records Retention Schedule Resource: <https://northwestern.edu/compliance/records-retention/records-retention-schedule.html>

Note: No document list can be exhaustive. Questions regarding the retention period for any specific record type not included in the Records Retention Schedule should be addressed to the University Compliance Office.

Legal Holds: In all cases, a legal or litigation hold supersedes the retention periods for records and documents. If you are unsure whether or not specific records are subject to a hold, contact the Office of General Counsel.

Duplicate Records: Offices/departments other than the “Official Repository” should delete/destroy any duplicate records promptly unless there is a business or other reason to retain the records, or unless directed otherwise to preserve Records.

Contacts

The University Compliance Office can address questions regarding this Policy:
records@northwestern.edu

History

Origination Date: June 30, 2009

Last Amended Date: March 4, 2010

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Policy URL:

<http://northwestern.edu/compliance/docs/retention-of-university-records.pdf>