



Records Retention Policy

Adopted: June 27, 2018

PURPOSE

The purpose of this Policy is to establish guidelines for record retention. This Policy applies to all Port employees and officials.

DEFINITIONS

“Public Record” means papers (reports, correspondence, studies, etc.), photographs, magnetic tape, microfilm, sound recordings, maps, drawings or any writing containing information relating to the conduct of government or the performance of any governmental or proprietary function prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics. Public Records encompass electronic documents, including Social Media posts, comments, and other records, whether created by computer, tablet, phone, or other electronic device.

“Retention Schedule” refers to the current Washington State records retention schedule which sets retention periods for specific government entities.

“Retention Period” refers to the period of time during which records must be kept before they may be disposed of, usually in terms of years or contingent upon an event, such as completion of a project.

POLICY

All departments will work with the Public Records Officer to insure that:

- Only active records are stored in valuable office space.
- Noncurrent records are regularly shifted to off-site storage.
- Historically valuable records are preserved and transferred to the State’s Regional Archives facility.
- Obsolete, valueless records are efficiently destroyed.
- Records essential to agency authority and operations are adequately protected from damage or loss.
- The Port will be prepared to recover or replace records damaged by fire, flood or other disaster.
- All information systems shall preserve the integrity and accessibility of the public records they hold for the duration of their required retention periods.
- Records will be made accessible for public inspection and their security will be maintained according to the provisions of the Public Disclosure Act.

RETENTION

All Public Records are required to be retained according to the Retention Schedule, regardless of how the record was created:

- If the transaction of public business occurs in paper then the paper record is the primary copy for retention purposes.
- If the transaction of public business occurs electronically then the electronic record is the primary copy for retention purposes.

There are certain records that have little or no retention value versus those records that must be retained as provided herein:

Records with retention value include (but might not be limited to):

- Correspondence or memorandum related to the official business of the Port.
- Original reports.
- Policy and procedure directives.
- Agenda and meeting minutes.
- Documents related to legal or audit issues.
- Messages documenting Port actions, decisions, operations and responsibilities.
- Documents related to Port transactions.
- Appointment calendars.

Records that are not likely Public Records and therefore have no retention value:

- Information-only copies of documents that do not relate directly to the functional responsibility of the Port or the department that receives them.
- Personal messages or announcements not related to the official business of the Port (i.e. cake for someone's birthday in the break room).
- Phone message slips that do not contain information related to the official business of the Port.

ELECTRONIC RECORDS

Electronic records must be retained in electronic format for the length of the designated retention period.

- Printing and retaining a hard copy is not a substitute for the electronic version.
- Metadata associated with "born digital" records establishes the authenticity of the record, providing evidence of the transaction taking place.
- Printing electronic records (e.g. emails) preserves the informational content but not the authenticity of the record and the metadata.

Electronic records and electronic mail should be retained as follows:

- For records originating within the Port, the person who creates and sends the message holds the Port record copy.
- For records received from outside the Port, the primary recipient or the Port recipient taking action holds the Port record copy.
- Thereafter, all electronic records and electronic mail should be retained for the length of time prescribed in the Retention Schedule.

Electronic documents stored on the Port server and drives (e.g. word, excel, PowerPoint, photos) will be labeled in accordance with the record management procedures using a standardized format across all departments.

ELECTRONIC MAIL AS A PUBLIC RECORD

An electronic mail message, like any other written or electronic information, is a record. As a public entity, the Port - and therefore its records - is subject to a high degree of scrutiny and open review. Though all electronic records are not open for disclosure, electronic mail users must be aware that their messages may be open to internal and public review. **Electronic mail messages are a public record.**

Policies:

- In composing and sending electronic mail messages, all users should treat their messages as though they would be disclosed to the public and Port staff.
- Confidential and sensitive issues should not be communicated via electronic mail.
- This includes any personnel issues (performance reviews, grievances, etc.) or issues related to high-level policy decisions.
- Routine electronic mail messages which have little value once acted upon should be deleted (i.e. automatically moved to the user's electronic mail wastebasket).
- The Port's electronic mail record-keeping policies will be updated as required to remain in conformance with state public disclosure law and any other applicable regulations.

PERSONAL EMAIL ACCOUNTS

The use of personal emails accounts to conduct Port business should be avoided. If you must send an email from a non-Port and/or personal account, copy to your Port email address at the same time. If you receive a business-related email on a personal account, forward to your Port email address and retain that as a primary copy. You should also retain a copy in your personal account.

WEBSITE

The Port retains all web content in accordance with the approved Retention Schedules, this includes design/architecture of website, content of website, and changes to website content.

USE OF PERSONAL DEVICE

Port employees and officials should strive to use Port issued devices and accounts to conduct all Port business. Records created, received or used on your personal device are Public Records if they are related to the conducting of Port business. It may be your personal device or account, but if it's being used for Port business you are accessing (and sometimes creating) Public Records. All records on your personal device must be kept in accordance with the Retention Schedule.

VOICEMAIL

Voicemail messages are Public Records if they relate to the conduct of Port business. All voicemails that are Public Records shall be retained according to the Retention Schedule. The following are options for retention:

- Option 1 – Save as an audio file attached to an email.
- Option 2 – Memorialize business transaction in email to sender summarizing content.

Voicemail audio emails will be labeled and stored in accordance with the record management procedures using a standardized format across all departments.

TEXT MESSAGING

It is discouraged to use text messaging for Port business. If texting is used for Port business, it is recommended that its use be limited to those for whom it is truly necessary (e.g., for specified law enforcement and emergency management functions). All texts created related to Port business must be retained by the person creating the text and held in accordance with the Retention Schedule.