Scanning records – where do I start?
Part 2 – Identifying your requirements
Restricted or Confidential Records issues to consider

Background information:

You have purged your inactive records according to the retention schedule (see Getting Started: Managing Records).

You have filing cabinets with records in them that:

A. Everyone accesses all of the time;
B. Some have restricted information in them;
C. Are NOT part of an ongoing litigation, audit or investigation; and
D. Take up a significant amount of space.

This is an attempt to address the beginning steps of any scanning/imaging project.

STEP	ACTION	COMMENT
1	IDENTIFY your requirements up front	
	A. The records you plan to scan and manage electronically have restricted information in them.	You must consider how you will control access before you begin your scanning project.
	1. Having an outside vendor scan your records.	Be sure that you address these issues in any agreement you make with the vendor. • How the records will be transported to and from the vendor • Who will have access to the records while they are not in your physical custody • How the vendor will protect the records from inappropriate access. • What type of employees they use for scanning records (some vendors use temp services, some may even use prisoners - for scanning and/or data entry for indexing), can they be bonded or does the vendor perform criminal background checks prior to hiring? • What their responsibilities are should there be a breach while the records are in their physical custody. • That the records belong to the university and no copies (paper or electronic) will be made other than those specified for your needs.

STEP	ACTION	COMMENT
2.	Once the records are scanned, access to the images must be controlled and documented.	• How will they be accessible to those who need to access the records? • How will they be protected from unauthorized access? • Will you need to plan for different kinds of access to different kinds of users? • Will this impact how many fields for indexing you will require in your electronic system? • Access requirements may change when the records are subject to litigation, an audit or investigation, this should be addressed upfront. • How will you monitor access to determine if there is a breach? • How will you manage a breach? • If allowed by law or agency regulations and University requirements, how will you destroy the paper records?
3.	You may want to consider using automated redaction tools for use with your scanned records for public records act requests.	You may want to purchase redaction software.
4.	When the retention period for the records has lapsed, destruction processes must control access and be documented.	• The system must allow for the complete destruction of the records, not just the metadata or indexing to the records. • The destruction process must allow for a human affirmation step to ensure the records are eligible for destruction (the retention period found in the UC Records Retention Schedule has lapsed) and the records can be destroyed(e.g. there are no records holds on the records).