

# Standard Operating Procedure

## “Orphan” or “Found” Records

### Procedure

“Orphan” or “found” records come to our attention by unconventional means: some are records abandoned in old filing cabinets; others are discovered during clean-up days. For these records, we only take custody and inventory those records which are:

- unique, and/or
- still under retention, and/or
- subject to a litigation hold.

All other records can be disposed of immediately without being inventoried.

When acquiring orphan records, check the contents for the following:

1. Are these copies? If you find copies of records—such as copies of Pinks—these can be recycled immediately.
2. Are these external documents? If you find presentation, brochures, magazines, booklets, studies, advertising, conference papers, etc., not produced by or for EDC, these can be recycled immediately.
3. Are these drafts, notes, research materials, working papers? If you find personal papers, these can be recycled immediately.
4. Are they sensitive or do they contain any personally identifiable information? If so, these documents can be destroyed, **BUT** they should not be recycled. Instead, they should be placed in bins for secure destruction.
5. Are they EDC records? If you find records documenting EDC projects and business procedures, do these records need to be retained in accordance to the records retention policy? Review the following:
  - i. If the retention period has been exceeded, check whether the records are subject to a litigation hold.
    1. If the records are subject to a litigation hold, they will need to be fully inventoried and held until the litigation hold has been released.
    2. If the records are NOT subject to a hold, they can be recycled or scheduled for secure destruction.

- ii. If the records are still within their retention period, check if a copy of these records is already inventoried and stored.
  - 1. If there is already a copy in storage, these records can be recycled or scheduled for secure destruction.
  - 2. If there is no other copy in storage (whether from the department of record or not), these records will need to be fully inventoried in the system as a regular accession.

## Notes

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