Abertay University

Archiving policy for Student Records

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Linked documents	Data Protection Act 1998, Higher Education Institutions Record Retention Schedule (RRS), JISC Data Protection Code of Practice for the HE and FE Sectors (DPCP)

Introduction

Students of the University are required, as part of the enrolment process, to give permission for personal data to be held by the University[1].

The University has a duty under the Data Protection Act 1998 to be clear why personal data about individuals is held and to ensure that personal data is only held where necessary. The University is also responsible for ensuring that any data held is accurate and not excessive.

This Archiving Policy provides University staff with guidance as to how the University requires its staff to archive the personal data of students.

In compiling this Policy, extensive reference has been made to the following documents produced by JISC[2], Higher Education Institutions Record Retention Schedule (RRS) and JISC Data Protection Code of Practice for the HE and FE Sectors (DPCP).

This policy forms part of the rules and regulations of the University and all staff are expected to adhere to its provisions. Queries about the implementation of this policy should be addressed to the Secretariat.

Types of Data and Retention Periods

1 **Examination Question Papers and Coursework Specifications**

Main Diet, Resit Diet papers and Coursework Specifications will be held electronically for 5 years after the end of the academic session in which they are set, for quality assurance purposes and to assist students to prepare for assessments.

2 **Examination Scripts**

Note – all examination scripts, even if they do not contain the students' names, do contain a registration number from which the identity of the student may be traced and are therefore classed as personal information.

All scripts will be held for one academic year[3] following the year of the assessment in order to allow the University to address complaints or appeals and for quality assurance and quality enhancement purposes. Students will be permitted to inspect their examination scripts in the presence of a member of academic staff during this period [Note - students have no right under the Data Protection Act 1998 to have access to scripts, but students do have a right to see copies of any comments made by internal or external examiners which are not written onto the examination paper itself].

Sample scripts from a representative sample of modules will be archived for a further three years (ie four academic years from the academic year of the assessment) for the purposes of quality assurance and enhancement. Normally the sample will comprise $\sqrt{N}$ scripts (or 6 scripts if N is less than 36) covering the full range of grades awarded, [where N is the number of scripts].

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[1] see Appendix 1 of the University Data Protection Policy
[2] http://www.jisc.ac.uk/
[3] consistent with RRS section 3.16

3 Coursework Scripts

Coursework scripts will normally be returned to students in order to provide them with feedback on their performance. However a representative sample of coursework scripts will be copied, for scrutiny by the external examiner during the academic session. Scripts that are not collected by students will be disposed of at the end of the academic year. Copies of electronically submitted courseworks and any electronically submitted feedback will be retained until the end of the academic year. Where the submission of a coursework assessment is required to be in electronic form, Schools may retain the work of all students for one academic year after the year of the assessment as for examination scripts, provided that this policy is made clear to the students.

Class tests will be treated as coursework for the purposes of archiving.

Sample scripts from a representative sample of modules will be archived, in electronic or paper form, for a period of four years after the year of the assessment for the purposes of quality assurance and enhancement. Normally the sample will comprise $\sqrt{N}$ scripts (or 6 scripts if N is less than 36) covering the full range of grades awarded. [where N is the number of scripts].

4 Project Reports

All honours and masters project reports will be held in electronic or paper form for one academic year following the year of the assessment in order to allow the University to address complaints or appeals and for the quality assurance and enhancement purposes.

Sample honours and masters project reports will be archived for a further three years for the purposes of quality assurance and enhancement. Normally the sample will comprise $\sqrt{N}$ scripts (or 6 scripts if N is less than 36) covering the full range of grades awarded.

Project reports other than honours and masters project reports will be archived as for coursework scripts.

5 Central Student Records System

The central student records system (SITS) contains the definitive record of student performance and will be maintained indefinitely[4] to allow students to obtain information on their achievement at University. This information will also be used, where appropriate, to allow confirmation of awards gained by students. It is anticipated that the nature of the student record will evolve as the University implements progress files including the development of the student transcript. Registry will be responsible for maintaining the integrity of this data record. Other records of student performance must not be retained except as outlined in this Policy.

6 Student Finance Records

Records of payment of fees and other financial transactions and outstanding debts to the University will be maintained for a period of six years as required by standard accounting practice.

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[4] consistent with section 18 of DPCP

7 References

From time to time members of academic staff are requested by students to provide references for students seeking employment or professional recognition. There is a responsibility on behalf of the referee to ensure the veracity of any information provided. Unless the member of staff has taught the student any reference should be confined to a confirmation of achievement and attendance as available from the student records system maintained by Registry. Where the student's explicit approval has been given in writing, a copy of a reference or material used to generate a reference may be retained by a school beyond the one year retention period for student files.

8 Disposal of Student Work

Student work should normally be disposed of by shredding unless it is possible to remove any features that would identify the student. Any project reports or case studies should be shredded to protect the confidentiality of the intellectual property.

9 Disposal of Student Files

Paper files will be destroyed by shredding. The University should ensure that staff are aware that deleting an electronic file does not destroy the information, only the pointer to the information and will make available software tools to facilitate the permanent deletion of student files.

10 Summary of Retention and Archiving Timescales for Student Files

The term 'student file' is defined as any paper or electronic file held in the School or other part of the University containing personal information about individual students other than the records held in the central student records system (see above).

An archiving / disposal strategy for this type of information should be based on consideration of the purposes for which the information may be required. A summary of possible purposes[5] is given in table 1.

The owner of the 'golden copy' of the record is responsible for ensuring that the University holds the records concerned for the recommended period. Other areas should destroy their copy as soon as their business need has ceased.

Where different types of records are held in one file, it is not usually practical to weed individual files. In this case, the retention period for the file is the longest period specified for any individual record or group of records in the file.

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[5] based on RRS and DPCP

Table 1

Data Type	Purpose	Recommended Period of Retention [* September is normally taken as the start or end of the period]	Held By
School generated student file	Various data including records of contact with the student	Five years after the last year of registration of the student	School
Student records relating to Nursing students	Statutory reasons of the Nursing and Midwifery Council	15 years	School
Records of counsellors meetings with students	To keep a record of advice given to student – required in case of litigation for negligence	4 years after last contact (BACP recommendation)	Student Services
Student Advisory Service (excluding counselling) e.g. claims for disability support, hardship funds, accommodation services, health services, careers services	Litigation for negligence	3 years after exit. If any investigation is instituted by the police, inland revenue etc, records should be held for longer and advice from the investigatory body sought.	Student Services
Records documenting the handling of applications. Registration of students on programmes. Academic progress of students and formal action to deal with unsatisfactory progress. Co-ordinating student funding arrangements. Documentation of termination/withdrawal.	Litigation for negligence	6 years after exit. If any investigation is instituted by the police, inland revenue etc, records should be held for longer and advice from the investigatory body sought.	Applications [SRO] Registration [Registry] Progress [Registry] Action re unsatisfactory progress [School] Termination [School]
Handling of complaints where formal the complaints procedure was not initiated	Appeals and possible litigation	3 years after the last contact or action	School
Conduct and results of disciplinary proceedings	Appeals and possible litigation	6 years after the last action	Vice-Principal (Academic)
Handling and results of academic appeals and complaints		6 years after the last action	Vice-Principal (Academic)
Records documenting submission, marking, return of coursework, organisation of work placements, student attendance	Complaints, appeals	Current year + 1 year*	School
Records of handling of unsuccessful applications	Complaints, appeals	Current academic year + 2 years	SRO [overseas] Schools
Records of potential applicants	[Marketing]	Current application cycle	SRO

Records documenting attendance at examinations and handling of reports of mitigating circumstances, documentation of the collation of assessment results, selecting external examiners, production of awards certificates, mailing certificates to students who do not attend ceremonies	Complaints, appeals	Current academic year + 1 year	Registry for all except mitigating circumstances and collation of assessment results (School responsibility)
First Destination Surveys	Compilation and checking of survey report	Destroy once the survey has been published	Student Services [Careers]
Alumni Records Mailing Lists Networking & Development Feedback	Marketing, research, maintaining alumni records, monitoring careers of alumni	Ongoing service – hard copy records destroyed once data is converted to electronic form. Data removed on request of alumnus. Requires to be kept under review and updated regularly[6]	Alumni Officer
Provision of information regarding references, attendance and results confirmation	Maintaining student records	1 year after completion of request	**[TBC]**

After the dates specified in this Table only information relevant to potential or actual litigation or further investigation should be retained. [Note: there is a statutory requirement to retain student records for longer periods in some programmes, for example in Nursing, where they are retained for 15 years]. The responsibility for maintaining and providing access to details of students' record of achievement lies with Registry (see section 5 above).

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[6] See pp 39-40 of DPCP

Version control table

Version number	Purpose / Changes	Author	Date
1.0	Initial policy approved	Depute Principal (Academic Development)	1 Oct 2003
1.1	Retention decisions added for nusring	Depute Principal (Academic Development)	22 July 2004
1.2	Reviewed and re-approved subject to minor changes owing to role changes and deletion of reference to External Examiner Appointment Forms.	Secretary, Quality Assurance Committee	29 Sept 2011
1.2	Pro Vice-Chancellor (Academic Development) replacing Secretary & Vice-Principal.	Secretary, Quality Assurance Committee	29 Sept 2011
1.2	Reference in Table to External Examiner Appointment Forms deleted.	Secretary, Quality Assurance Committee	29 Sept 2011
1.3	Revision to the first two rows of the Table in Section 10 as follows (i) row 1 period of retention for School generated student file records. Replace 'one year after the last year of registration' with 'five years…' (ii) row 2 replace 'School student records, including achievements and conduct' with 'School student records relating to Nursing students' and replace the cell relating to purpose with 'Statutory reasons of the NMC' and replace the cell relating to period of retention with '15 years'. The proposal was approved by QAC in May 2013 and noted by Senate in June 2013.'	Registrar	5 June 2013
1.4	Update cover sheet to display new logo	Policy Officer	8 Oct 2014