

RM Framework Guidance Document: Student Records Storage and Retention

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1. **Background**

The JISC Guidance on Managing Student Records recommends that each institution establishes its own policy for managing student records.

The aim of this policy will ensure that:

1. Records relating to an individual student are complete, accurate and up to date;
2. Duplication of student data is deliberate rather than uncontrolled and kept to the minimum needed to support effective administration;
3. Records are held and stored securely to prevent unauthorised access to them;
4. Records relating to the academic aspects of the students relationship with the institution are clearly segregated from those dealing with financial, disciplinary, social, support and contractual aspects of that relationship. This will enable different retention periods to be applied to each of these to meet business and regulatory requirements.

2. **What are student records?**

The University primarily keeps records about students to fulfil and discharge our contractual obligations with each student (this includes the completion of any non-academic disciplinary action), and to provide information on the academic career and achievements of the student to employers, licensing/regulatory bodies and other organisations, as well as to the student as part of their lifelong learning record. We also keep records about the activities of students as individuals and as consumers of student support and other institutional services as a means of managing those services and planning and developing them in the future.

Therefore, and in accordance with the JISC Guidance on Managing Student Records, student records can be organised into three broad categories:

- A. Records documenting the contractual relationship between the student and the institution
e.g. records documenting admission and enrolment, payment of tuition fees, non-academic disciplinary proceedings.

- B. Records documenting the students as a learner
e.g. records documenting programmes undertaken, academic progress and performance, awards.
- C. Records documenting the student as an individual and consumer of services provided by the university
e.g. records documenting use of accommodation services, counselling services, library and IT support services, careers and employment services.

3. Who is responsible for managing student records?

The department who creates the record is generally responsible for ensuring the record is accurate and appropriately stored for the lifetime of that record. The University Retention Schedule lists who the primary record holders are for each type of record. If a School keeps a duplicate copy of a student record in their files then these must be also destroyed in accordance with the retention schedule.

4. Who keeps student records at the University?

a. Admissions Office

The Admissions Office keep central records relating to the majority of applications made to the University for the current academic year (some Schools manage their own admissions processes, and those schools will be responsible for maintaining their own student's admissions records). At the end of each academic cycle records produced by the Admissions Office for centrally managed courses are either destroyed in accordance with the University Retention Schedule for applications which were unsuccessful or did not transpire into an accepted place, or transferred to Academic Services Division who will keep these records in accordance with the University Retention Schedule.

b. Academic Services Division (ASD)

ASD keeps central records of all current and former students (from 2002) on Saturn. These records contain all core contractual information about the student, plus transcript details which will be kept indefinitely by the University to ensure that student references and transcripts can be produced. Saturn does not record details of students who graduated at the University prior to 2002. It is therefore important that Schools maintain transcript records of these students. It is recommended that schools contact ASD if they have student records they wish to destroy to ensure that a central record is maintained at the University.

c. Academic Schools

Schools maintain student files for the duration of the students' time at the University which are kept in accordance with the University Retention Schedule. These files are primarily for keeping records relating to the student as a learner at that School including personal progression and transcript details. Transcript details will be forwarded to Academic Services Division for permanent preservation after each set of marks has been confirmed, and can therefore be destroyed by the School when they no longer have a requirement for them.

Academic Schools keep student files for no less than 6 years after a student has left their course to provide detailed records which may be used in the event of a claim made by the student. These can also be used to provide personal references during this time. Requests for references made to the University after this period will consist of a transcript confirmation only.

The Graduation Proceedings is the official record of the Lord Dearing Award, the University Prize, the Nottingham Advantage Award and the Tempest Prize for Outstanding Contribution to Widening

Participation. Schools are responsible for keeping their own permanent records for other non-curriculum prizes or awards given out by that school.

Individual Departments

Records relating to the student as an individual and consumer of services provided by the University such as membership to clubs and societies, dealings with departments such as security, accommodation, finance, counselling etc are kept by those departments and there is no requirement that duplicate copies should be kept in student files. Keeping records about the student that are not relevant would be in breach of the Data Protection Act.

5. How long should we keep student records?

In general the retention of student records falls into three broad categories: short, medium and permanent.

It is the nature of the activities which give rise to these categories, and having a better understanding and appreciation of what these are will help to identify which category individual documents will fall into. Once you have determined the category it is the record owner's responsibility to determine the exact length of time these records should be kept. The University Retention Schedule lists the minimum amount of time the records should be kept. If a School wishes to keep records for longer they should make a noted reference within their own records keeping documentation explaining the reasons why.

a. Short Term Retention

Records relating to the student as an individual and consumer of institutional services are relatively short term and should be retained for a short finite period once the student leaves the institution. This period should be shorter than for records relating to the wider contractual arrangements. E.g. applicant records for unsuccessful applications relate to individuals who have not entered into a contract with the University and should therefore be included within this short term category for retention.

b. Medium Term Retention

The contractual relationship between the institution and the student is subject to the same statutory limitations on action as any other contract. The current limitation period as defined by the Limitation Act is 6 years. The date at which the student leaves that programme of study normally provides the retention 'trigger' for when this retention period begins.

c. Permanent Retention

The University has an obligation, during a student's working life, to provide factual information on what they have studied and achieved, i.e. a transcript. The retention period for these records should reflect the need to fulfil this obligation over long periods of time, perhaps for the lifetime of the student.

d. Requirements under the Data Protection Act

The Data Protection Act does not specify a time period for retaining personal information rather it states that personal data should 'not be kept for longer than is necessary'. It is therefore for the University to decide what length of time is considered 'necessary'.

6. How should student records be stored?

All records containing personal information should be kept securely. The Data Protection Acts specifically states that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Some schools currently operate a paper based student filing system, whereas some schools have now adopted an electronic filing system. The benefits of an electronic student filing system are that these records are backed up by servers and can be recovered at a future date if necessary. The principles for both remain the same. Schools keeping a paper based student filing system should always keep these files in lockable filing

cabinets or rooms which can only be accessed by those members of staff who have a legitimate requirement to access them. For electronic files, this means that access rights should be given so that only specified individuals can open them.

All staff who process student records should also attend Data Protection Training, courses of which are run monthly at the University.

7. How should student records be destroyed?

Student records should always be destroyed confidentially. The University operates a confidential waste disposal service via Estates. If you are unable to shred the data within your schools you can request that the files are collected for confidential destruction via the Estates Department. If you have large volumes of confidential waste, the mobile shredding service will be sent to you directly.

For destruction of electronic storage devices or other non-paper records, please contact the Information and Records Manager.

8. Guidance about student files held by Schools

a. Student Files Retention

Student Files kept by Schools should be regarded as a short to medium-term record, with the exception of Fitness to Practice documentation as outlined below. School Student Files are used to provide:

- i. information for references in the six year period immediately following the individual's departure from their programme of study. Whilst individual tutors may keep short term records about students for administrative purposes ie about tutorial meetings, attendance etc, these records should not be kept once their purpose is no longer required. The School office should be the official and sole repository for all student records.
- ii. evidence in the event of a claim made to the University by the student following the completion of their contract with us. The Limitation Act recommends that the minimum retention period for contractual records is 6 years from date of settlement (ie graduation). All records listed in the core and duplicate records listed below can be argued to fall within this definition and should therefore be kept for 6 years from leaving/graduation.

b. Student Files: Core Records:

- Marks breakdowns
- Recommendations
- Any references provided by the School
- Complaints documentation administered at School level
- Documentation relating to academic offences
- Academic appeals
- Pastoral/welfare support documentation provided by the School
- Prizes awarded by the School
- Receipts of bursaries provided by the School
- Details of work placements
- Fieldwork/Study abroad documentation
- *Fitness to practice documentation (if applicable)

** There is an expectation that Schools providing medical, dental, nursing and other health care professional education to notify Professional Licensing and Regulatory Bodies of fitness to practise concerns about individual students at the time of their first registration so that they can be assessed as part of the registration process. The current University Retention Schedule lists Fitness to Practice documentation to be kept for 50 years. This is currently under review and will be reduced to a more realistic timeframe in due course.*

In addition to the student file, Schools may keep student data in other locations such as electronic attendance registers, these should also be deleted after 6 years.

c. Student Files: Duplicate Records:

The following are acceptable duplicate records that Schools may wish to keep for their own administrative purposes:

- Admissions form
- Duplicate copies of correspondence sent to the student from ASD regarding their contractual status at the University ie:
 - Reassessment Letters
 - Termination Letters
 - Registration Suspension letter
 - Immigration Suspension letter
 - Debtor Suspension letter
 - Academic Offences Outcome letter
 - Appeal outcome letter
 - Complaint outcome letter
 - Examination Reports
 - Invoices (exceptional fees)

This list is not exhaustive. If you have a need to keep additional duplicate records for an administrative reason, make sure you are doing so for a specified purpose.

d. Pre-2002 Student Records

Academic Services Division (ASD) keep student details recorded on Saturn. These records only date back to 2002. Academic Schools need to keep the following student details for students who left prior to 2002, unless these details have already been received and confirmed as held by ASD:

- Basic student details (dob, name, etc)
- Study details (years of study, qualification)
- Marks
- Modules (full names and module codes)
- Course/module handbooks for every academic year

e. Email correspondence

Email correspondence can be useful where the email contains a decision that concerns the student and is evidence of that decision; however, it is unlikely that an email would be the only evidence of this and should only be used if it is the only record.

It is important that general student files are not used as a depository for general email correspondence about a student. If you are intending to file a copy of an email in a student file make sure you are very clear about your reasons for doing so. If emails are required as part of a subject access request they will be included in our standard search procedures, therefore there is no requirement for them to be stored in a student file.

Keeping excessive emails in a student file could be deemed to be in breach of the principles of the Data Protection Act.

f. Additional Documentation

Additional documentation should be treated with caution and should not be kept without necessary reasons. Additional documentation that does not carry a 6 year retention period should be clearly marked in a student's file so that on graduation/leaving they can be removed and not retained unnecessarily for the 6 year retention for the rest of the file.

g. Teaching and Assessment Records

The student file is predominantly for records that document a student's contractual relationship with the University, and includes academic results. The retention of assessed materials does not need to be kept for as long. In accordance with the Academic Appeals policy students have one calendar month from receiving notification of the decision by the academic body to submit an appeal. Therefore the retention period for marked examination scripts and coursework is generally very short. The School should decide how long they keep these records, taking into account the minimum retention periods listed on the University Retention Schedule.

In addition it is advised that Schools should read the guidance also provided in the Quality Manual for the retention of assessed work.

<http://www.nottingham.ac.uk/academicsservices/qualitymanual/assessmentandawards/retention-of-assessed-work.aspx>

9. Further Information

JISC Guidance on Managing Student Records:

<http://tools.jiscinfonet.ac.uk/downloads/bcs-rrs/managing-student-records.pdf>

The University of Nottingham Records Retention Schedule:

<http://www.nottingham.ac.uk/governance/records-and-information-management/records-management/retentionschedule.aspx>

JISC Records Retention Schedule (see 'Printable RRS')

<http://bcs.jiscinfonet.ac.uk/he/default.asp>

JISC stands for the Joint Information Systems Committee. The JISC is a joint organization set up by the Higher Education Funding bodies of England, Wales, Scotland and Northern Ireland to fund information technology investment in UK Universities. Their Records Retention Schedule (RRS) for Higher Education Institutions is the result of extensive consultation within the sector plus significant additional research both undertaken for JISC infoNet by Emmerson Consulting.

The RRS provides statutory or recommended retention periods for the records produced by each activity.

Governance and Information Compliance Team, webpages:

<http://www.nottingham.ac.uk/governance/records-and-information-management/records-and-information-management.aspx>

Records Retention workshops can be requested by schools. For further information please contact:

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