

Records Management Policy

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The Records Management Policy will be reviewed regularly by our Senior Management Team (SMT) in line with our Policy Review Schedule. A review may also be triggered because of changes in the legislative requirements. Any amendments require the approval of our Senior Management Team.

1. Introduction

Bloomsbury Institute recognises that the efficient management of its records is necessary in order to support and provide evidence of its core functions, to comply with its legal and regulatory obligations, to meet accountability requirements and stakeholder expectations and to enable effective management of the institutions to advance its strategic priorities.

This policy establishes a framework and accountabilities for records management to ensure that Bloomsbury Institute is in full compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

2. Scope

For the purposes of this document, this policy applies to all student and staff records. 'Student records' refer to records relating to leads, enquirers, applicants, students, and alumni (see Retention Schedule at Appendix 1).

Student records are mainly created and directly utilised for:

- Management of institution and student relationships
- Management of student's academic achievement, progress and completion
- Management and provision of services and facilities
- Provision of required service during and after completion of their studies.

There are several other indirect uses of student records which include monitoring, defining future strategy and provision of information to regulatory bodies.

It should be noted that the schedule has been designed to reflect the current provision at Bloomsbury Institute. It does not include activities which rest with the awarding body.

2.1 The legal context

The governing legal principles are derived from the [Data Protection Act \(DPA\) 2018](https://www.gov.uk/government/collections/data-protection-act-2018)¹ and the [UK General Data Protection Regulation \(UK GDPR\)](https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation)². Overarching details of how we comply with the DPA 2018 and UK GDPR can be found in our [Data Protection Policy](https://www.bil.ac.uk/qem/policies/)³. It is important that this policy is read in conjunction with our Data Protection Policy.

3. Roles and responsibilities

The Data Protection Officer (DPO) is responsible for overseeing this policy and has the responsibility of ensuring that all records are deleted/destroyed as per the retention schedule. The DPO can also provide advice on any records that are not directly mentioned in this schedule. It should be noted that operational data sets are not highlighted in this schedule; however, the activities column within the retention schedule can be used to manage deletion of operational data sets. The DPO can be contacted at dpo@bil.ac.uk.

All Heads of Divisions/Departments are responsible for ensuring that staff within their respective areas of responsibility comply with this policy, and should develop appropriate practices, processes, controls and training to ensure that compliance. Responsibility for the deletion of student records, lies with the Head of Division/Department where the data is collected and/or processed, under the guidance of the

¹ <https://www.gov.uk/government/collections/data-protection-act-2018>

² <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

³ <https://www.bil.ac.uk/qem/policies/>

DPO. It is recommended that the Head of Division/Department delegates the deletion activity to a member of their staff.

The People, Talent and Culture (PTC) Manager is responsible for the processing, collection, maintenance and storage of staff records.

The Compliance Manager is responsible for non-UK and non-Irish citizen right to work checks and also has a responsibility to ensure that appropriate oversight and audit is made for all right to work checks for new and existing staff including those performed by PTC (for UK and Irish citizens). As such, the Compliance Manager, as well as PTC, has some responsibility for staff records and particularly, for Skilled-Workers (and for staff recruited under the Tier 2 system) and all-staff audit of documentation.

The Head of Data Management and Statutory Returns will also collect, process and store certain staff data to the extent required, for example, for the HESA Staff Record.

All staff at Bloomsbury Institute handle student data at some point. It is therefore essential that all staff have completed the GDPR training, fully understand our [Data Protection Policy](#)⁴, and are familiar with the retention schedule which relates to their area/s of activity.

4. Student records

Student records may be electronic, or paper based. According to the Joint Information Systems Committee (JISC), records are documents or other items which:

- Contain recorded information;
- Are produced or received in the initiation, conduct or completion of an activity;
- Are retained as evidence of that activity, or because they have other informational value.

Student records associated with managing the relationship between us and our students can be broadly categorised as follows:

- Records documenting the contractual relationship between the student and our institution e.g., records documenting admission and enrolment, payment of tuition fees, non-academic disciplinary proceedings.
- Records documenting the student as a learner e.g. records documenting courses undertaken, academic progress and performance, and awards.
- Records documenting the student as an individual and consumer of services provided by our institution e.g., records documenting use of support services, the library and IT support services, careers and employment services.

4.1 Core student record

Besides the broader categories of records above, it is important to define the minimum content of a “core student record”. This is the type of record which should be retained for 10 years after the completion of studies.

Below are the minimum items within a core student record:

- Student name and identifier (LON Number);
- Date of birth;
- Address at commencement and completion/termination;

⁴ <https://www.bil.ac.uk/qem/policies/>

- Course and dates;
- Visa status
- Performance/assessment, name, date and result of award (transcripts);
- Details of student's status upon completion of study or upon leaving Bloomsbury Institute prior to completion, e.g., withdrawal from course;
- Changes to core record e.g., change of course

All elements of the above are kept for six years, however the formal achievement records e.g. transcripts should be held for the lifetime of the student which is defined as 80 years from the date at which the student leaves Bloomsbury Institute. This applies in all cases, irrespective of whether the student completes the course. The formal achievement records e.g., transcripts can be archived 6 years after completion of study.

5. Staff records

The People, Talent and Culture Manager will create and maintain a secure electronic staff file on our OneDrive system for all employees. This will hold the core information to be retained, as noted below, and in accordance with the Retention Schedule (Appendix 1).

In addition, a staff record will be set up in our online HR Portal – Breathe HR Online. Any member of staff placed on our payroll (including hourly paid) will have a Breathe HR Online record created. Records stored on Breathe HR Online will be restricted and limited to basic personal data, sickness and leave data, one to one meetings data and right to work documentation.

The Compliance Manager will collect, process, maintain and electronically store securely certain right to work and audit documentation in a location separate to the main employee file maintained by PTC. Such documentation (other than that connected to audit work) will be replicated in the main employee file held by PTC, once shared by the Compliance Manager.

5.1 Core staff record

Information to be retained on the main employee file held by PTC should include:

- Application information, including CV
- Right to work documentation
- References
- Shortlisting notes (including the reasons for selection or rejection in each case)
- Interview notes for all members of the selection panel (including the reasons for selection or rejection in each case)
- Selection test paperwork
- Any other documentation provided by candidates (copies of qualifications, etc).

Additional record-keeping responsibilities apply where employees are Skilled Workers and those on the (previous) Tier 2 system (such record-keeping is directed by the UKVI).

6. Disposal of personal data

We are required to retain certain records for operational and administrative purposes and to demonstrate compliance with statutory or regulatory requirements. This is done while remaining

compliant with the Data Protection principle⁵ which requires that personal data are not kept longer than is necessary for their purpose.

The Data Protection Act 2018 places an obligation on Bloomsbury Institute to err on the side of caution when disposing of personal data. All staff have a responsibility to consider safety and security aspects when disposing of personal data in the course of their work. Consideration should also be given to the nature of the personal data involved (how sensitive it is), and the format in which it is held.

Below are some of key steps which must be taken by individuals, departments or divisions;

- On the basis of the retention schedule, all relevant departments/divisions should review records in their custody.
- Departments/divisions should consider creating an internal annual schedule and establish the best time in the year to delete/dispose of records. To create such a schedule, staff can seek advice from the DPO.
- Departments can decide on the number of instances per year that they would like to carry out the above activity. The number of instances will depend on the type of record for which they are responsible and the recommended retention time for that record type.
- The DPO will conduct periodic audits to ensure that the retention schedule is followed.

Staff should ensure that all paper or microfilm documentation containing personal data is permanently destroyed by shredding or incinerating it, depending on the sensitivity of the personal data.

7. Related regulations, policies and procedures

External

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Value Added Tax Act 1994
- Limitations Act 1980

Internal

- Information Control Procedures
- Data Protection Policy
- Confidentiality Policy

8. Review of Records Management Policy

This policy will be reviewed regularly by our Senior Management Team (SMT) in line with our Policy Review Schedule. A review may also be triggered because of changes in the legislative requirements. Any amendments will be subject to approval by the Senior Management Team.

⁵ Article 5 of the GDPR sets out seven key principles which lie at the heart of the general data protection regime.

Appendix 1 – Retention Schedule

Note: the [JISC Records retention management schedule](https://beta.jisc.ac.uk/guides/records-retention-management)⁶, Consumer Markets Authority and Limitation Act 1980, were taken into account when producing this retention schedule.

Subject	Retention Period	Location	Responsibility	Action at end of retention period
Student Recruitment and Admissions				
Recruitment campaign and events data e.g. lists of attendees and their details	End of current application cycle + 5 years	Radius	Head of Marketing, Communications and UK Student Recruitment	Delete / destroy
Enquiries from individual prospective students (subsequently registered as a student)	End of current application cycle + 5 years.	Radius / Outlook		
Enquiries from individual prospective students (not subsequently registered as a student)	End of current application cycle + 1 year.	Radius / Outlook		
Individual student application files: unsuccessful applicants	End of current application cycle + 3 years	Radius		
Individual student application files: successful applicants (other than those records held as part of the Core Student Record)	Student graduation or departure + 6 years	Radius and then Oracle		
Records documenting the administration of induction programme and events for new students	Current academic year + 1 year	Radius, network & hard copy storage area	Director of SEWS	
Complaints about admissions	5 years	SharePoint/Outlook	Deputy Chief Operating Officer	
Student Administration				

⁶ <https://beta.jisc.ac.uk/guides/records-retention-management>

Core electronic and paper record of individual students, including: <ul style="list-style-type: none"> • basic personal details • information gathered at application • information gathered at enrolment • course/s undertaken, including relevant dates of teaching and assessment • information on academic progress and performance, including assessment outcomes and progression and award outcomes • any supplementary information required for professional accreditation • summary information on academic appeals and complaints • summary exceptional circumstances claims information • the transcript • reference(s) 	Student graduation or departure + 6 years	Oracle	Head of Academic Administration	Electronic records: Delete - with the exception of data items required for production of transcripts, which should be archived 1 year after course completion and retained for the lifetime of the student (80 years). Paper records: Destroy (though longer retention periods may be necessary due to specific contractual requirements)
Formal support requests e.g. reasonable adjustments, disability related data, provision of other support, fitness to study panels	Student graduation or departure + 6 years	Oracle	Director of SEWS / Head of Academic Administration	Delete / destroy
Student Progress				
Summaries of mitigating circumstances evidence information relating to individual students	Held as part of Core Student Record (see above)	Oracle	Head of Academic Administration	Held as part of Core Student Record (see above)
Records documenting individual students' engagement	Student graduation or departure + 6 years	Oracle/ TDS / EDS / Canvas	Head of Academic Administration / Director of SEWS / Head of Compliance	Delete / destroy
Confirmed pre-module Board reports	Student graduation or departure + 6 years	SharePoint	Head of Academic Administration	Delete / destroy
Student annual re-enrolment confirmation	Held as part of Core Student Record (see above)	Oracle	Head of Academic Administration	Held as part of Core Student Record (see above)

Student Assessment				
Summative submitted assessments including examinations, dissertations and projects	Student graduation or departure + 5 years	Canvas	Head of Assessment	Delete/Destroy
Examination scripts for students who have withdrawn or had their studies terminated.	Student withdrawal or termination + 5 years	Canvas		Delete/Destroy
Pass Lists/Award Lists	Perpetuity	Network		Delete/Destroy
Student Complaints, Appeals, Discipline and Misconduct				
Records documenting the conduct and results of disciplinary proceedings / formal complaint / academic appeals	Last action on case + 6 years	Network, Oracle	Deputy Chief Operating Officer	Delete/Destroy
Records documenting the handling of complaints made by individual students where formal complaints procedure is not initiated.	Last action on case + 3 years	Network, Oracle	Deputy Chief Operating Officer	Delete/Destroy
Graduation ceremony records, including invitees and attendees	Student graduation or departure + 1 year	SharePoint	Director of SEWS	Delete/Destroy
Finance				
Fee payments / Bursaries and Scholarships records	Student graduation or departure + 6 years	Oracle / SharePoint	Chief Financial Officer	Deletion, unless permanent retention is required by Financial for historical/archiving purposes.
Hardship loans / grants	Student graduation or departure + 6 year Note: The hardship loan/grant application request/form will be deleted 2 years following the student's graduation or departure, but details of the actual payment will be retained for six years, in line with other financial records.	Oracle / SharePoint		Permanent in HESA files. Delete/Destroy

Appeals relating to fees	Student graduation or departure + 6 years	Oracle SharePoint	/	Chief Financial Officer	Delete/Destroy
Council tax exemption certificates	Student graduation or departure + 6 years	Oracle SharePoint	/	Head of Academic Administration	Delete/Destroy
REGULATORY					
HESA data files	Submission of file + 6 years	Oracle SharePoint	/	Head of Data Management and Statutory Returns	Delete/Destroy
NSS data files	End of survey + 6 years	Oracle SharePoint	/		Delete/Destroy
Graduate Outcomes data files and Alumni data set	End of survey + 6 years	Oracle SharePoint	/		Delete/Destroy
Staff records					
Documents relating to sponsorship application (i.e. qualification certificate, job description). Contract of employment, absence records (i.e. sickness, family leave and annual leave records). Additionally for Sponsored Workers or Tier 2 visa holders: Recruitment records (i.e. applications, interview notes, recruitment decision summary grid etc), job adverts and allowance valuations. The Home Office / UKVI provides guidance on records that should be collected and retained.	End of sponsorship + 6 months	BreatheHR Onedrive	/	PTC Manager / Compliance Manager	Delete/Destroy
Records documenting enquiries about vacancies and requests for application forms	Completion of recruitment process	BreatheHR Onedrive	/	PTC Manager	Delete/Destroy
Recruitment records (applications, references, shortlisting notes, interview notes, selection test paperwork, any other paperwork such as copies of qualifications, provided by candidates, etc)	Successful appointment of applicant + 6 months (Unless employee is a Tier 2/5 sponsored migrant or sponsored worker where specific UKVI guidance applies).	BreatheHR Onedrive	/	PTC Manager	Delete/Destroy

Copy of right to work check documents	End of employment + 2 years	BreatheHR Onedrive	/	PTC Manager / Compliance Manager	Delete/Destroy
Sickness records	End of the tax year to which the record relates + 3 years (Unless employee is a Tier 2/5 sponsored migrant or sponsored worker where specific UKVI guidance applies).	BreatheHR Onedrive	/	PTC Manager / Compliance Manager	Delete/Destroy
Maternity/Adoption/Paternity leave records	End of the tax year to which the record relates + 3 years (Unless employee is a Tier 2/5 sponsored migrant or sponsored worker where specific UKVI guidance applies).	BreatheHR Onedrive	/	PTC Manager / Compliance Manager	Delete/Destroy
Parental leave records	Birth/adoption of the child + 18 years	BreatheHR Onedrive	/	PTC Manager / Compliance Manager	Delete/Destroy
Personnel files and training records (including ASADS, redundancy details etc)	End of employment + 6 years	BreatheHR Onedrive	/	PTC Manager / Compliance Manager	Delete/Destroy
Wage/salary records	End of employment + 7 years	External Payroll company		PTC Manager	Delete/Destroy
For visitor visa holders: copy of immigration status check (i.e copy of passport and visa/immigration stamp)	For duration of visit.	BreatheHR Onedrive	/	Compliance Manager	Delete/Destroy

