Student Records Policy

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This policy will be reviewed annually by our Senior Management and Leadership Team (SMLT). A review may also be triggered because of changes in the legislative requirements. Any amendments will be subject to approval by the Senior Management and Leadership Team.

1.   Policy statement

This policy and associated retention schedule are a statement of the measures which Bloomsbury Institute has adopted to ensure that it fulfils its responsibilities with regards to the retention of student records, and that Bloomsbury Institute is in full compliance with the Data Protection Act 2018 and the General Data Protection Regulation ((EU) 2016/679) (GDPR).

This policy applies to all student records, as defined in Appendix 2. It also applies to all staff and others creating and processing student records, for example external company, within their role and remit.

All Heads of Divisions/Departments and Directors, who are office holders of functional areas, 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.

The Academic Registrar is responsible for overseeing this policy and associated schedule. The Academic Registrar can be reached at academic.registrar@bil.ac.uk. The Data Protection Officer has the responsibility of ensuring that all records are destroyed as per the schedule. DPO can be contacted at dpo@bil.ac.uk.

2.   Introduction and scope

For the purposes of this document, 'student records' refer to records relating to enquirers, applicants, students, and alumni (see Appendix 2)

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 University of Northampton.

2.1   The legal context

The governing legal principles are derived from the Data Protection Act (DPA) 2018[1] and General Data Protection Regulation (GDPR)[2]. Overarching details of how we comply with the DPA 2018 and GDPR can be found in our Data Protection Policy. It is important that this policy is read in conjunction with our Data Protection Policy. Our Data Protection Policy articulates the GDPR principles, which must be complied with by the processors of student records.

It is also important to understand when and why data can be acquired and processed. GDPR articulates the legal basis for processing any form of data. The legal basis can be split into many categories, for example:

- Consent

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[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

- Contract

- Legal obligation

- Vital Interests

- Public task

- Legitimate interest

Information on these can be found here[3].

2.2   Student records

Student records and how they are created, processed and/or stored have undergone many changes. The regulations surrounding these records have also changed over time. The records may be electronic, or paper based. However, the types of student records predominantly are the same. 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, awards.

- Records documenting the student as an individual and consumer of services provided by our institution e.g. records documenting use of support services, library and IT support services, careers and employment services.

2.2.1   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;

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[3]   https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/

- Course and dates;

- Performance/assessment, name, date and result of award (transcripts);

- Details of student's status upon completion of study;

- Changes to core record e.g. change of course

All elements of the above are kept for 6 years, however the core 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. The core transcripts can be archived 6 years after the completion of the study.

2.2.2 Responsibility of staff

All staff at Bloomsbury Institute handle student data at some point during the academic year. It is therefore essential that all staff have completed the GDPR training, fully understand our Data Protection Policy, and are well versed with the retention schedule which relates to their area of activities.

Overall responsibility for overseeing compliance with this policy lies with the Academic Registrar and Heads of Division/Department are responsible for implementing this policy for the records within their control. Responsibility for overseeing the deletion and destruction of data lies with the DPO. Responsibility for the deletion of data itself, lies with the Head of Division/Department where the data is collected and or processed, under the guidance of the DPO.

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

The Academic Registrar is responsible for providing advice on the records which 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 can be used to manage deletion of operational data sets.

3. The retention schedule

The schedule set out in Appendix 1 outlines most of the relevant student records and how they are managed with regards to retention. If a particular item is not included within this list, then staff should contact the Academic Registrar to seek advice.

In many instances, it is debateable as to how long a record should be kept. In general, there are three overarching principles which have to be considered:

- the operational requirements of processing a particular record. This is mainly while the activities are "live" or "recent";

- any future need to process the record or data set;

- the legal limit required by the relevant legislation.

In order to produce the schedule and determine the length of retention of key record types, several sources have been consulted. These include:

- Recognised sector wide good practice

- GDPR

- Limitations Act 1980

It should be noted that this schedule relates to student records only and not to other types of documents and recorded information (e.g. staff records).

3.1   Guide to the schedule

The schedule is split in to 5 columns:

- Type of record and/or activity
- Retention period – the length of time the record is stored before deletion
- Any triggers for retention period – the date that the retention period begins
- Location - where the record may be stored
- Responsibility - who has responsibility for the record

Note: the 'location' section refers to the electronic copies, however if there are any hardcopies they have to be managed in the same way as the electronic records.
The schedule is implemented in the same way for any localised databases not detailed in the location column.

As mentioned above, if a particular activity is not covered by the schedule, then the Academic Registrar should be contacted for advice.

Duplication of records is highly discouraged under the GDPR principles. It should therefore be ensured that duplication is limited to activities that cannot be performed effectively without keeping duplicate records. Such decisions can only be made by Heads of Division/Department, in conjunction with the Academic Registrar.

In some cases, a record may be stored in multiple locations; however, the retention schedule applies to all locations. There may also be shared responsibilities split between departments, in which case the application of the schedule is to be followed by all departments concerned, according to the remit of the departments and the location that the record is saved.

Please note that anonymised data sets are not covered through this schedule and are not, therefore, subject to the same retention periods.

4.   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 principle[4] 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.

- On the basis of the retention schedule, all relevant departments should review student records in their custody.

- The departments should create an internal annual schedule and establish the best time in the year to delete/dispose of records.

- 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.

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

- These schedules should be signed off by the DPO and the Academic Registrar.

- Once a record has been deleted/disposed of for that academic year, the completed schedule should be shared with the DPO. To create such a schedule, they can seek advice from either the Academic Registrar or the DPO.

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. If there are any details of a private nature on a piece of paper, this paper must be disposed of in the correct manner to ensure that it cannot be reconstituted, and the data stolen. This means using appropriate methods for disposing records.

5. Further advice and guidance

Further advice and guidance can be obtained from our Academic Registrar by emailing academic.registrar@bil.ac.uk

6. Related regulations, policies and procedures

External

- Data Protection Act 2018

- General Data Protection Regulation ((EU) 2016/679)

- Value Added Tax Act 1994

- Limitations Act 1980

Internal

- Information Control Procedures

- Data Protection Policy

- Confidentiality Policy

7. Review of Student Records Policy

This schedule will be reviewed annually by our Senior Management and Leadership Team (SMLT). A review may also be triggered because of changes in the legislative requirements. Any amendments will be subject to approval by the Senior Management and Leadership Team.

Appendix 1

Schedule

Type of Record	Retention Period	Trigger	Location	Responsibility
MARKETING				
Recruitment campaign and events data e.g. lists of attendees and their details	5 years	Upon creation	Radius	Communications
Analysis of student enquiry and recruitment data where individuals can be identified	5 years	Upon creation	Radius	Communications
Enquiries from prospective students	3 years	Upon creation	Radius / Outlook	Communications
APPLICATIONS, ADMISSIONS & INDUCTION				
Records documenting the handling of unsuccessful admissions, including interview notes	5 years	Year of rejection	Radius	Admissions
Records documenting the handling of successful admissions applications, including interview notes, offer and offer acceptance (students)	6 years	Completion of study	Radius and then Oracle	Admissions
Records documenting the administration of induction programme and events for new students	1 year	Upon creation	Radius, network & hard copy storage area	Communications/SEWS
Complaints about admissions	5 years	Last action	SharePoint/Outlook	Academic Registrar
GENERAL STUDENT DATA				
Core student record	10 years	Completion of study	Oracle	Registry

Change to core record Change of course, withdrawal from course	6 years	From change	Oracle (forms)	Registry
Facts of enrolment and academic performance (dates of study, transcripts, progression, programme of study, marks, final award etc)	Perpetuity		Oracle to archived data source 1 year after completion	Registry/ IT
Full student records, including documents relating to application/admission; academic achievements and conduct; transfer, withdrawal or termination of studies	6 years	From completion of relevant activity	Oracle to archived data source 1 year after course completion	Registry/ IT
Formal support requests e.g. reasonable adjustments, disability related data, provision of other support, fitness to study panels	6 years	From last transaction	Oracle	SEWS / Registry
Records documenting the handling of individual students' requests for statements of results/transcripts and third party requests for confirmation of student status etc.	1 year	Last action of activity	Oracle	Registry
ENGAGEMENT, EXAMINATION, ADMINISTRATION and PROGRESSION				
Mitigating Circumstances	10 years	From decision	Oracle	Registry
Extension requests	10 years	From decision	Oracle	Registry

Records documenting individual students' engagement records	3 years	Completion of study	Oracle/TDS/Canvas	Registry/SEWS
Documents referring to coursework marks/grades and assessment. AMP forms	1 year	Completion of study	Oracle/Canvas	Registry
Confirmed pre-module Board reports	6 years	Completion of study	SharePoint	Registry
Options selection data	1 year	Completion of study	SharePoint	Registry
Student annual re-enrolment confirmation	1 year	Completion of study	Oracle	Registry/IT
Module mapping	1 year	Completion of study	Network SharePoint	Registry
Pass Lists/Award Lists	Perpetuity		Network	Registry
STUDENTS' ACADEMIC WORK				
Summative submitted assessments including examinations, dissertations and projects	3 years	Completion of study	Canvas /	Registry/IT
Examination scripts for students who have withdrawn or had their studies terminated.	3 years	From withdrawal/termination	Canvas	Registry / IT
DISCIPLINE, APPEALS AND COMPLAINTS				
Records documenting the conduct and results of disciplinary proceedings against individual students.	10 years	From last action on case	Network, Oracle	Registry
Records documenting the handling and results of academic appeals by individual students.	10 years	From last action on case	Network, Oracle	Registry

Records documenting the handling of formal complaints made by individual students.	10 years	From last action on case	Network, Oracle	Registry
Records documenting the handling of complaints made by individual students where formal complaints procedure is not initiated.	3 years	From last action on case	Network, Oracle	Registry
GRADUATION CEREMONIES				
Records, including invitees and attendees	1 year	From completion of ceremony	SharePoint	SEWS
FINANCE				
Fee payment records	7 years	Completion of study	Oracle / SharePoint	Finance
Bursaries and Scholarships records	7 years	Completion of study	Oracle / SharePoint	Finance
Hardship loans / grants	1 year	Completion of study	Oracle / SharePoint	Finance
Library fines	1 year	Completion of study	Oracle / SharePoint	Finance
Council tax exemption certificates	7 years	Completion of study	Oracle / SharePoint	Registry
Appeals relating to fees	7 years	From last action	Oracle / SharePoint	Finance / Registry
REGULATORY submission records				
HESA data files	6 years	From submission	Oracle / SharePoint	Registry
NSS data files	6 years	From survey	Oracle / SharePoint	Registry
Graduate Outcomes data files and Alumni data set	6 Years	From survey	Oracle / SharePoint	Registry

Appendix 2

Glossary

Student record; for the purposes of this document student record entails, enquirers, applicants, students and alumni.

Completion of study; completion of study in this document means end of studies on the basis of, course completion, withdrawal from course (voluntary and involuntary), death, inability to continue due to other circumstances.

Record; this includes both electronic and hardcopy records.

GDPR; General Data Protection Regulation.

DPA; Data Protection Act 2018

Legal basis; basis of creating and processing of record as per law.