

**ACADEMIC GUIDANCE 8:
MANAGEMENT AND RETENTION OF STUDENT FILES**

2011-2012

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MANAGEMENT AND RETENTION OF STUDENT FILES

Academic Directorate approved this policy on the retention of data on students. (September 2001). It was reviewed in May 2011 and the revised policy approved by the Academic Regulations Committee in June 2011.

INTRODUCTION

- 1 In the light of Data Protection issues and students' increased rights of access to both paper and electronic information, a working party was established to draft a policy for consideration by Academic Directorate. The working party had representation from each faculty and from Student Information. It was chaired by the Academic Registrar and clerked (and advised) by the Data Protection Officer. Its' work was guided by the JISC Data Protection Code of Practice for UK FE and HE.

DEFINITIONS

- 2 **Students** For the purposes of this policy, a student is anyone who:
 - has entered into an initial contract with the University to be considered for admission to a programme of study, *i.e.* an applicant
 - is registered/enrolled at the University, *i.e.* a current student
 - has completed their studies at the University, *i.e.* a former student
- 3 **Files** any personal information about a student that is kept in a systematic manner electronically or as hard copy. For the purposes of this policy, the files concerned are those relating to the student's registration for an award or credit.

DATA PROTECTION

- 4 The Data Protection Act requires that information should:
 - only be used for the purpose(s) for which it was obtained unless the data subject has given explicit permission for it to be used for another purpose. For example, when students enrol at the University we obtain their permission to retain their records once they have completed their programme of study for the purposes of maintaining an alumni database
 - only be kept for as long as it is relevant for the purpose(s) for which it was obtained or subsequently sanctioned by the data subject
 - be kept accurate and up to date for as long as it is kept
 - be accessible if required for disclosure under the Act

Principles for student files:

- 5 As a general rule, there should be only one computerised record for an individual student and one hardcopy file. The file should be held by the faculty or department responsible for the operational process, *i.e.* duplication of files should be avoided.
- 6 The identified manager of the process will be responsible for the maintenance of the data to ensure accuracy and ease of access.

- 7 There should be agreed time limits for retention of data.
- 8 Files should be kept safely and securely with access limited to those who have a legitimate need to know.
- 9 The destruction of files must be carried out in a timely and secure manner and a record of the data of destruction retained by the data holder.

Application stage

- 10 The data managers responsible for data on applicants are the Applicant Services Operations Manager and the Faculty Business Managers (FBMs). Once applicants become students the data manager become the FBMs and Student Administration.
- 11 Applicants who do not accept an offer by the University or who are rejected:
- application forms and electronic data held for no more than 18 months from the date of receipt by Applicant Services;
 - if other departments e.g. Recruitment and Development wish to retain personal (as opposed to summary statistical data), they will maintain the data with the agreement of the applicants.

Applicants who accept an offer

- 12 Application forms and supporting documents should be transferred to the faculties once the admission process is complete. The applicant data should be retained on the student file in accordance with paragraph 18 below.

Current student stage

- 13 Once an applicant becomes a student, there will be one electronic data source and one hard copy file.
- 14 Overall responsibility for the electronic student data rests with Student Administration together with the faculties responsible for the field(s) of study. All courses in the University are managed by a single lead faculty and this faculty is responsible for the hard copy student file. Faculties are also responsible for overseeing any additional records on students kept by academic staff.

Academic assessment

- 15 Academic Guidance 12: Data Protection and Assessment provides guidelines on data protection issues and assessment.
- 16 Students have a right of access to information held on them. For example:
- their marks, including provisional results if they are retained;
 - any comments made by examiners. This also applies to comments on examination scripts although the scripts themselves are exempt from access

Other processes

- 17 Where additional processes are carried out that are not directly related to the student's registration for an award of credit, such as consideration for hardship funding, non-academic disciplinary matters, etc, files may be established and held by the department that is responsible for the process concerned. These will be retained in accordance with relevant statutory limitation periods, which in most cases will be

six years from last contact. Exceptions to this are health and counselling matters including dyslexia (see <http://student.kingston.ac.uk/C0/DisabilityandDyslexia/default.aspx> for more information).and financial files which are subject to separate audit requirements.

Complete student stage

18 Once a student has left, the following information will be kept by Student Information in perpetuity:

- basic student data - name, date of birth, address etc.
- dates of registration
- award received (if any)
- credit received *i.e.* transcript from 2001 onwards

19 Normally, faculties should retain the more detailed hard copy student file for at least six years from the date of completion or the termination of registration. This is the statutory limitation period for any claims for negligence. It is recommended that faculties do not keep these files for longer than ten years except where there is a requirement to do so from a professional body. In these cases, a minimum data set should be agreed.

Disclosure of data

20 Only factual or otherwise justifiable data should be stored either on paper or electronically. In the event that a subject access request made under the Data Protection Act is received from a current or former student, it is essential that the Data Protection Officer is made aware of ALL files containing personal information about the individual concerned as s/he is responsible for providing copies of the personal data contained therein.