Heythrop College
Student Records Management, Retention and Disposal Policy

Records retention and disposal is the process by which the College decides whether records that are no longer current should be destroyed or transferred to the archive. All College records fall into three categories:

- Current (when data may be added to the record);
- Semi-current (when the record has been closed but is used as a reference tool for administrative purposes);
- Archived (when it has been selected for permanent retention).

Policy Context and Summary

Student files must be retained in accordance with the Data Protection Act 1988 and the Limitation Act 1980. The former act protects students' personal data by ensuring that it is not held longer than necessary, while the latter act provides the ability for students to sue for negligence up to six years after leaving the College.

Since this document is the College's first policy on records retention, in terms of usual procedure going forward, this policy will cover the 2005/6 graduate leavers (and those students whose relationship with the College ceased by the end of 2005/6) onwards. Existing files created from the establishment of the College until the 2005/6 academic year will be pruned in accordance with the procedures described below for stage one over the 2006/7 academic year.

All student files held in Registry fall within the category of 'current'. While a student remains at Heythrop College, their file is considered to be 'current'. Once departed (either through graduation or withdrawal), their file becomes 'semi-current'. Both undergraduate and postgraduate files are held within Registry whilst 'current'.

Current Student Files

Registry creates a student file just prior to registration. For undergraduates, this file will typically contain a UCAS application form / supplementary papers, the College offer letter and any reply documentation. For postgraduates, the file would contain application form and references, as well as any correspondence with the student to date.

Typical information added to the file during a student's time at the College includes:

- Academic progress data
- Transcripts
- Change of personal details forms
- Change of module forms
- Data relating to debt

- Withdrawal/suspension/transfer forms
- Data relating to any disciplinary offences
- Correspondence with funding bodies
- Correspondence with tutors concerning the student
- Correspondence with the student

Semi-current student files

At the end of the academic year in which the relationship between the student and Heythrop College terminates, the status of the file changes to 'semi-current'. The procedures that are set out below describe how Heythrop manages files. From leavers in the 2004/5 cohort, a robust permanent academic record of a student's time at the College will be maintained on the Student Records Database (SITS), which includes data on a student's identity, years of study, together with marks and final degree. Over the long term, this information and a skeleton hard copy file of essential reference data will be the only data kept.

Procedures for the management and storage of files relating to departed graduate students

- Files are moved out of Registry to the Student records archive room where they remain in their entirety for one academic year. The archive room is kept locked at all times.

- At the end of the first academic year after the termination of the relationship, the file will be pruned in accordance with the "Pruning Procedures - Stage One" set out below and stored as a semi-current record for a further five academic years.

- At the end of the five academic year period, all files will undergo a final pruning exercise and the remaining data will be permanently archived. This archived data will consist of the bare minimum required in order for the College to verify and confirm a student's past study.

Pruning Procedures – Stage One

In accordance with the above procedures, at the end of the of the first academic year in which individual student files are held as 'semi-current', they will be pruned and stored for a further five academic years. In order to ensure consistency, the following list describes what information must remain on the file following the first pruning process. All other data will be securely destroyed.

Where it exists, all files must contain information relating to the following:

- Application form
- Letter giving details of offer (a copy of each letter if more than one offer)
- Funding information eg SLC/ sponsor
- Academic progress data (including completion and further completion data)
- Data relating to de-registration
- Appeals documentation
- Change of mode of study form
- Disciplinary offences – outcomes only
- Academic offences – outcomes only
- Complaints – outcomes only
- Award letter / transcript of module(s)
- Letters / correspondence that would enable the College to formulate an accurate picture of the student's period of study

The following will not be retained:

- References forming part of the admissions application process
- Transcripts for entry qualifications
- Statements of financial liability
- To Whom It May Concern letters
- Change of addresses (if appearing on Change of Personal Details Forms, with no other changes – otherwise retained)
- Refund letters
- Photographs of student
- Registration forms and any documents allied to the registration process of each academic year

Data Protection
In accordance with the Data Protection Act 1998, all personal data held in Registry student files is held fairly, securely and for specific purposes. It is managed in accordance with this policy and will be pruned in two stages. Disclosures of personal data are only made in accordance with the provision of the act and only to members of staff who need the information to carry out their duties. Data subject rights are maintained at all times.

Records Retention Schedule
The following retention schedule provides a structured framework for the retention and disposal of all records managed by Registry and covers student records.

The retention period refers to the life of the record as a "current" or "semi-current" record. When a record reaches the end of its retention period, it must be either

destroyed or archived permanently. An internal audit review of Registry and College wide formalized policy revealed various gaps in policy documentation relating to data protection and the development of the following schedule was therefore commissioned for implementation from the 2006/7 academic year and effective for graduates / leavers in the 2005/6 academic year. The College fully recognizes the importance and need of a College wide Records Retention Policy and will work towards full College wide compliance to this policy over the next few years. We are implementing the policy and compliance in phased stages; the first stage will cover student records, subsequent phases will cover personnel, finance, Governance / Corporate Management and library services. It is planned that all sections of the College will produce and start to adhere to its own specific retention schedule ready for the 2008/9 academic year leavers. The retention schedule detailed as follows will be supplemented with further retention schedules from other sections of the College as time goes by until all sections are included.

Applications, Admissions and Induction

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
Records documenting the handling of enquiries from prospective students	Current Academic Year + 1 year	Student Services Centre	Good practice
Records documenting the handling of applications for admission: unsuccessful applications	Current Academic Year + 1 year	Student Services Centre	Good practice
Records documenting the handling of the clearing process	Current Academic Year + 1 year	Student Services Centre	Good practice
Records documenting the administration of induction programme and events for new students	Current Academic Year + 1 year	Student Services Centre	Good practice

General Student Files Collated during Academic Year

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
Facts of registration and academic performance (dates of study, transcripts, progression, programme of study, marks, final award etc)	Perpetuity	Student Services Centre while current then transferred to Archive Room	Provision of references and confirmation of registration/final award etc.
Full student records, including documents relating to application/admission; academic achievements and conduct; transfer, withdrawal or termination of studies	Current Academic Year + 1	Student Services Centre while current then transferred to Archive Room	Permits College to provide references for a reasonable length of time. Also, limitation period for negligence.
Records documenting the handling of individual students' requests for statements of results/transcripts and third party requests for confirmation of student status etc.	Last action on request + 1 year	Student Services Centre while current then transferred to Archive Room	Good practice

Programme and Examination Administration

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
Class lists & schedules for submitting/marking work.	Current Academic Year	Tutor, PG /UG Administrator (Student Services Centre)	Good practice
Records documenting individual students' attendance, and submission of coursework.	Current Academic Year + 1 year	Tutor, PG /UG Administrator (Student Services Centre)	Good practice

Documents referring to coursework marks/grades and assessment.	Completion of studies + 1 year	Tutor, Student Services Centre	Good practice
Records documenting organization of examination facilities (inc. special arrangements); attendance at examinations; handling of impaired performance claims; collation and notification of results.	Current Academic Year + 1 year	Student Services Centre	Good practice
Pass lists/Award lists	Perpetuity	Student Services Centre	Formal record, forms part of archive and kept securely apart from Archive Room.

Students' Academic Work

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
Undergraduate Coursework (including dissertations & essays, all years)	Current Academic Year + 3 years	Student Services Centre	Retention duration taken from federal system
Postgraduate Taught Coursework (including dissertations, all years)	Current Academic Year + 3 years	Student Services Centre	Retention duration taken from federal system
Examination Scripts from Year One	Current Academic Year + 3 years	Student Services Centre	Relevant time to let students exercise right of appeal or in case of any other dispute.
Examination Scripts from Year Two onwards	Current Academic Year + 3 years	Student Services Centre	Relevant time to let students exercise right of appeal or in case of any other dispute.
Examination Scripts for students who have withdrawn or had their	Current Academic Year + 3 years	Student Services Centre	Relevant time to let students exercise right of appeal or in

studies terminated			case of any other dispute.

Discipline, Appeals and Complaints

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
Records documenting the conduct and results of disciplinary proceedings against individual students	Last action on case + 6 years	Student Services Centre (and relevant HoD)	Limitation period for negligence
Records documenting the handling and results of academic appeals by individual students	Last action on case + 6 years	Student Services Centre (and relevant HoD)	Limitation period for negligence
Records documenting the handling of formal complaints made by individual students	Last action on case + 6 years	Student Services Centre (and relevant HoD)	Limitation period for negligence
Records documenting the handling of complaints made by individual students where formal complaints procedure is not initiated	Last action on case + 3 years.	Student Services Centre (and relevant HoD)	Limitation period for negligence

Graduation Ceremonies

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
Records documenting the organization of award ceremonies	Completion of ceremony + 1 year	Student Services Centre	Good practice
Records documenting the production, collection and mailing of award certificates	Completion of ceremony + 1 year	Student Services Centre	Good practice

Miscellaneous

Type of Record	Minimum Retention Period	Location	Reason for Length of Period
First Destination Surveys: Individual responses	Completion of analysis of responses (unless used for historical statistical or research purposes)	Careers Service	Good practice
Records documenting the selection and appointment of external examiners	Termination of appt. + 1 year	Student Services Centre, HoD	Good practice
Records documenting liaison with external examiners on administrative matters	Current academic year + 1 year	Student Services Centre, HoD, Dean	Good practice
Records documenting the selection and appointment of examination invigilators	Current academic year + 1 year	Student Services Centre	Good practice
External Examiner reports and departmental responses	5 years	Student Services Centre, HoD	Institutional Audit, Internal Programme Review and Accreditation purposes