Student Records Procedure: Part 1 current records

Information Governance and Records Management Policy

Procedures relating to:	Information Governance and Records Management
Approving authority:	University Executive
Consultation via:	Global Information Governance and Data Protection Committee
	Global Operations Executive (GOE)
Effective date:	1 July 2021
Review period:	Annually from date of approval
Responsible Executive:	Secretary of the University
Responsible Office:	Registry and Academic Support
	Information Governance, Governance and Legal Services
Territorial Scope:	Global

HERIOT-WATT UNIVERSITY
INFORMATION GOVERNANCE AND RECORDS MANAGEMENT POLICY

CONTENT

1. INTRODUCTION

1.1 These procedures set out how the University manages records about students, applicants and alumni during the 'current' phase of the [information lifecycle](#), to meet the objectives of the [Data Protection Policy](#) and the [Information Governance and Records Management Policy](#). In particular:

- Controlling access to information strictly on a business need to see basis ([Confidentiality](#))
- Retaining information only as long as necessary, and in line with the University's retention schedules ([Lifecycle](#))
- Organising information in a way that means authorised individuals can locate and retrieve information timeously whenever required, including when requested by the data subject ([Available](#))
- Recording complete and accurate information ([Integrity](#)), but no more information than necessary, so that the records can be relied on and used to account for our actions and decisions ([Accountable](#))

1.2 These procedures apply to records about all applicants, current and former students across all campuses and modes of study, for example:

- On campus (Edinburgh, Scottish Borders, Orkney, Dubai, and Malaysia) students
- Exchange and work placement students
- Students who take a year out or are under temporary suspension of studies
- Students who study for Heriot-Watt University awards with Partner institutions
- Independent distance learners

1.3 These procedures apply to records documenting the entire student lifecycle from enquiries to alumni, including student recruitment, enrolment, attendance and attainment, advice and support services, fees, payments, bursaries, grants, appeals, complaints and disciplinary proceedings, verification of awards, alumni activities, subject access requests and third-party requests for personal data.

1.4 These procedures apply to all paper and electronic records which document student and application administration and assessment. It includes but is not limited to records and information held in the information systems listed in [Appendix 1](#).

1.5 These procedures provide the 'business rules' for managing student records, as required by section 3 of the [Code of Practice on Records Management](#).

2. PROCEDURES FOR APPLICANT AND PROSPECTIVE APPLICANT RECORDS

2.1 The Head of Prospect Experience & Conversion will agree responsibilities and procedures for the management and security of student applicant records and associated personal data with the Heads of Operations in Schools. These officers will agree record keeping standards and protocols for all undergraduate and postgraduate student recruitment to:

- Provide an agreed chain of custody to retain an accurate record of each application and its outcome.

- Demonstrate that a fair and consistent recruitment process has been followed in each case and where relevant, meet the requirements of the UK Home Office
- Ensure that all relevant information about each successful applicant who goes on to matriculate as a student is captured in the core student record, including evidential documents submitted in the course of the application
- Implement the timeous destruction of application data where the applicant is unsuccessful or does not enrol, in accordance with the University records retention policies

2.2   The scope of the standards and protocols will take account of all records and information documenting the application process including:

- Enquiries from potential applicants
- Applications submitted through UCAS
- Application forms submitted directly to the University online or in paper format
- Associated evidential records such as certificates of prior awards, reference, passport and visa records and financial guarantees
- Correspondence between University staff, contractors and agents and applicants concerning the progress of their applications and decisions made

2.3   Contractual agreements and induction for recruitment agents and contractors will incorporate these record keeping standards and security controls so that agents will have a clear understanding of their responsibilities as data processors for the University.

2.4   CRM Recruit, the Customer Relationship Management System, forms the evidential record of the correspondence between each prospective applicant and the University, from initial enquiry to acceptance of offer.

2.5   From the point that the University receives an application from UCAS, or a potential student begins the process of applying online using myHWU (the student portal), a unique applicant record is created in the Student Administration Systems (SAS). From this point, SAS and CRM Recruit become the evidential record documenting the progress and outcome of each application.

2.6   Retention periods are set out in the Student Lifecycle Retention Schedule. The following paragraphs describe how those retention periods are implemented for records relating to student applicants and prospective applicants held in CRM Recruit and SAS.

2.7   **For each successful applicant who goes on to enrol as a student**, at the point of enrolment, the Registry and Academic Support directorate (RAS) are responsible for capturing in the official student record file all relevant information including evidential documents submitted in the course of the student's application. This will involve transferring documents from CRM Recruit into the student file. All documents relating to enrolled students must be transferred from CRM Recruit into the student file by the end of the academic year in which the student was enrolled.

2.8   **For each applicant who does not enrol as a student**, the Marketing, Recruitment, Admissions and Communications directorate (MRAC) liaises with the Information Services directorate (IS) to carryout an annual deletion of the applicant

records from CRM Recruit and SAS. The annual deletion occurs at the start of the academic year after the year in which the applicant was seeking to enter the University. This applies:

- Where the applicant has not submitted the application and there are no associated applications or student records since 31 August in the previous academic year
- To applications which have been rejected, withdrawn or to which no offer was made by 31 August in the previous academic year; with no associated applications
- Where the applicant has not accepted and enrolled on a programme within the next academic year
- Where the applicant has accepted a place but has not enrolled or requested deferred entry

2.9   Prior to the annual deletion, MRAC staff **export anonymised application statistics** for statutory and business reporting purposes. These anonymised statistics have archival value and are retained permanently.

2.10   As SAS and CRM Recruit contain the evidential records of applicants, any paper copies of these records of applicants who are unsuccessful or do not enrol or request deferred entry can be confidentially destroyed in November of the academic year in which they would have enrolled.

3. PROCEDURES FOR STUDENT RECORDS AND ASSOCIATED PERSONAL DATA

3.1   The Global Academic Registrar and RAS Division Heads will jointly implement the following agreed business rules for managing student records and associated personal data.

3.2   This section focuses on the management of the core student record stored in SAS and in the individual student files held by Schools. Standards for the management of student records created in the course of delivering professional services or adjudicating complaints or disciplinary proceedings can be found in section 4 below.

3.3   The RAS directorate will create and maintain a **comprehensive student record of the progress and attainment** for each student. This comprehensive student record comprises:

1. The primary student record held on the electronic student records system (SAS) and its predecessor ISS. SAS and ISS do not contain all of the records that must be retained for each student, so must be supplemented by a separate student file.
2. A student file is maintained for each student. RAS is responsible for these files. In the case of physical files, these are held at the campus at which the student studied. For those students who are based off campus or study with Approved Learning Partners, any physical records are held at the Edinburgh campus.

3.4   RAS is responsible for ensuring that acceptable mechanisms for student file management are in place to maintain the confidentiality, integrity, accessibility and

resilience of all student files until they are transferred to the University Museum and Archive.

3.5 The Student Lifecycle Retention Schedule provides a list of records that should be retained, how long they should be retained, and which should be retained permanently by the University Museum and Archive.

3.6 Each student file should be structured to easily distinguish between:

1. Records to be retained permanently by the University Museum and Archive
2. Records to be kept for a limited period (defined by the University's record retention schedules) and then destroyed securely.

3.7 Student files will be held securely and in a secure format such that access is governed by the University systems security matrix in line with government legislation.

3.8 Academic staff must pass all correspondence with students about their progress to the RAS administrators for filing within the student file. Academic staff should not retain any records, correspondence, or paperwork on individual students, other than 'live' working documents, which should be transferred to the student file as soon as practicable.

3.9 Where a student has entered the UK on a Tier 4 visa, RAS is responsible for keeping the records required by Home Office immigration rules and making those records (but only those records) available to UK Visas and Immigration (UKVI) auditors when requested.

3.10 The Global Academic Registrar and Heads within RAS will agree and jointly implement business rules for managing **student case files** and associated personal information created in the course of providing RAS functions. The Student Service Centre Manager will liaise with managers in Student Records & Awards, Finance Office, and Campus Services to agree and implement business rules for management of records created in the Student Service Centre.

4. PROCEDURES FOR RECORDS OF OTHER SERVICES PROVIDED TO STUDENTS

4.1 Each professional service which provides services to students, or relating to students (including student conduct, complaints, and appeals) must maintain an accurate and comprehensive **student case file or equivalent customer record** documenting its interactions with each individual student and any decisions made in relation to that student. Relevant professional services include but are not confined to the services and functions found at https://www.hw.ac.uk/uk/students/index.htm.

4.2 The Information Asset Owner is responsible for agreeing and implementing the business rules for managing their service's student case files in compliance with the Information Governance and Records Management Policy and University Retention Schedules.

5. PROCEDURES FOR RECORDS OF EXAMINED AND ASSESSED STUDENT WORK

5.1   Schools and RAS will store work submitted by students for examination and assessment securely and retain it in accordance with the University's record retention schedules only so long as it is required for business purposes to:

- assess and award grades, in accordance with internal and external examination procedures
- support students' rights to feedback and transparency in understanding how examination marks and grades have been awarded and to exercise their rights to appeal within the deadlines specified in Regulation 36 (Student Appeals)
- provide a sample only as evidence for quality assurance and professional review and meet the University's obligations to external accrediting bodies.

6. PROCEDURES FOR ALUMNI RELATIONS RECORDS

6.1   Alumni data is imported into the Raiser's Edge CRM from both Banner and EBS Global and is processed under the [Alumni and Supporters Privacy Notice.](Development) & Alumni Relations have separate supporting documentation on the operational processes around data administration.

7. RELATED POLICIES AND PROCEDURES AND FURTHER REFERENCE

7.1   These procedures should be read in conjunction with information governance policies published at https://www.hw.ac.uk/uk/about/policies.htm, in particular:

- [Information Governance and Records Management Policy](#)
- [Data Protection Policy](#)
- [Information Security Policy Framework](#)

7.2   These procedures should be read in conjunction with the learning and teaching polices published at https://www.hw.ac.uk/uk/services/academic-registry/quality/learning-teaching/learning-and-teaching-policies.htm

7.3   These procedures should be read in conjunction with the University's relevant privacy notices, data protection impact assessments (DPIAs) and Records of Processing Activities, in particular:

- [Privacy notice for prospective students](#)
- [Privacy notice for current students](#)
- [Privacy notice for alumni and supporters](#)
- Development and Alumni Relations DPIA

7.4   These procedures refer to the following sources of more detailed information:

- [Student Lifecycle Retention Schedule](#)
- [Alumni Relations Retention Schedule](#)

- Student Administration System (SAS) user support documentation available at: https://heriotwatt.sharepoint.com/sites/is-ws-sassupport/

7.5 These procedures support compliance with legislative and regulatory requirements, in particular:

- Data protection law: UK Data Protection Act 2018; UK General Data Protection Regulation; Malaysia Personal Data Protection Act 2010
- Home Office Immigration Rules

8. FURTHER HELP AND ADVICE

For further information and advice about this procedure contact:

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9. DEFINITIONS

Archives	Records which have been created or received by the University in the course of its activities and functions and selected for permanent preservation for their historical or evidential value by the University Museum and Archive in consultation with the records creators.
Business rules	The rules that set out what records need to be kept to meet business, regulatory, legal and accountability

purposes. The Information Asset Owner should endorse the rules. The rules should set out:

- What records should be kept
- By whom this should be done
- At what point in the process this should be done
- What the records should contain
- Where and how they should be stored

In developing the rules consideration must be given to:

- Any legislative or regulatory requirements
- The need to document actions and decisions to support current business needs and accountability requirements
- The need to protect the rights of the University, staff and students
- The need for the University's records to meet the information governance principles.

Confidential information

The definition of confidential information can be summarised as:

- Any personal information that would cause damage or distress to individuals if disclosed without their consent.
- Any other Information that would prejudice the University's or another party's interests if it were disclosed without authorisation.

A more detailed definition can be found in the University Information Security Classification Scheme

Information

Details (data, facts, opinions etc.) about something. Information is sometimes defined as data endowed with meaning and purpose.

The definition of information includes, but is not confined to, paper and electronic documents and records, email, voicemail, still and moving images and sound recordings, the spoken word, data stored on computers or tapes, transmitted across networks, printed out or written on paper, carried on portable devices, sent by post, courier or fax, posted onto intranet or internet sites or communicated using social media.

Information asset owner (IAO)

The senior manager accountable for the business function or activity to which the information assets relate. For example, the Global Academic Registrar is the IAO for information assets that include those relating to students.

Information governance	Information governance is the framework of accountability, processes and controls to support the effective management of information throughout its lifecycle to meet organisation's business needs and legal and stakeholder obligations. It incorporates the creation, management and destruction of information, information security, privacy, access rights and legal discovery.
Information system	Any system which captures, manages, and provides access to University information assets, including line of business applications. An information system may consist of technical elements such as software and non-technical elements including procedures, guidance, people and assigned responsibilities. Systems may be digital and complex where many of the information management activities can be automated, or a simple paper-based system where information management activities are performed manually according to agreed procedures. Examples of information systems used by the University include: Banner; Oracle ERP; Worktribe; Canvas virtual learning environment (VLE); customer relationship management systems (CRM); M365 Workspaces; Records Storage & Retrieval Service.
Personal data	Information in any format that relates to an identified or identifiable living person. An identifiable living person is someone who can be identified directly or indirectly from an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person. Although the UK GDPR and the Data Protection Act 2018 apply only to living people, the scope of this policy also includes information about deceased individuals. This is because disclosure of information about the deceased may still be in breach of confidence or otherwise cause damage and distress to living relatives and loved ones.
Record	Recorded information or data (in any format) created, received, or maintained by the University (or someone working or acting on its behalf) in the transaction of University business or conduct of University affairs and kept as evidence of those activities for business, regulatory, legal or accountability purposes.

'Business purposes' are any purposes which support the University's functions and activities. 'Regulatory purposes' are any purposes which support or demonstrate the University's compliance with regulatory requirements. 'Legal purposes' are any purposes which support or demonstrate the University's compliance with any legal obligation. 'Accountability purposes' are any purposes whereby the University answers for its conduct.

Retention schedule

Sets out the agreed length of time the University needs to keep different types of records. Retention schedules are policy documents which support compliance with legislative and regulatory requirements.

The University's retention schedules are available at: University Retention Schedules.

Student file

The comprehensive student record of the progress and attainment of each student. This file is distinct from student case files. Each student file comprises:

- Records held in SAS, and
- Paper student file held by the student's school and / or
- Electronic student file held by the student's school

When viewed together, records on a student file form an audit trail of the University's interaction with an individual student and the decisions made about the student. The element of the student file that is held by a student's school may be 'hybrid' and include both electronic and paper elements.

Student case file

Each professional service which provides services relating to students maintains a case file or equivalent customer record documenting the service's interactions with each individual student and any decisions made in relation to that student.

10. POLICY VERSION AND HISTORY

Version No	Date of Approval	Approving Authority	Brief Description of Amendment
V. 5 May 2021	xx.xx.2021	University Executive	These procedures replace the Student Records Management Policy and the Procedures for the management of student and applicant records which were approved on 3 December 2013.

11. APPENDIX 1: OVERVIEW OF RELEVANT INFORMATION SYSTEMS

System Name [Supplier Name]	Description	Holds	Access	Retention Management
Akari Curriculum [Akari]	Curriculum Management	Module descriptors and approval records		Permanent retention
Banner [Ellucian]	Student Records System, including Student and Faculty Self-service	Core student record		Retention periods have been mapped to the system. Configuration/development is required to support implementation
Banner Document Manager [Ellucian (App Extender)]	System to retain documents related to the student file	Documents submitted in evidence by students in support of Mitigating Circumstances and Temporary Suspensions of Study.		Documents will be destroyed in line with retention polices using BDM automated features.
Banner Workflow [Ellucian]	System to support business process automation			
Blackboard	Virtual Learning Environment (VLE)			
Canvas	Virtual Learning Environment (VLE)			
CRM Recruit [Ellucian]	System to support recruitment and admissions	Prospect, recruit and applicant data		See 2.6 to 2.10 above
ERP		Financial transactions with students, e.g., tuition fee payments		
Exam Scheduler [Scientia]	Exam timetabling system	Details of exams and the students		Retained in line with University retention policies.
Gecko Engage		Information about prospective students		Short-term retention prior to transfer to CRM Recruit.

System Name [Supplier Name]	Description	Holds	Access	Retention Management
		before it is transferred to CRM Recruit.		
KX **[Kinetic]**	Student accommodation system. We have a UK and Malaysia instance of this software.	Student room allocations, requirements and rent details.		Retained in line with University retention policies.
MSL - Student Union Voting System	Alumni club elections	Email and names of eligible alumni electorate	Student Union system	Alumni sign up for an account and can reuse their log in to vote each year.
PAMS	Curriculum Management	Module descriptors and approval records		Permanent retention
PCMIS	The case management system used by Wellbeing Services			
Power BI **[Microsoft]**	A business analytics service that provides interactive visualisations	Statistical data about students		
Pure **[Elsevier]**	Research information system	Information about HWU research staff, publications, research data, activities, and collaborations and links to research outputs. Includes data that allows affiliation of postgraduate research student to organisations and potentially supervisors so that they can be attached to content in Pure they have helped generate.	No data currently visible on Portal and backend access by login only	
Raisers' Edge **[Blackbaud]**	Alumni CRM	Alumni records	Cloud based system. Password protected.	Alumni records are kept indefinitely under our charter.

System Name [Supplier Name]	Description	Holds	Access	Retention Management
			Access via DAO Services Manager	
SAS	SAS is an umbrella term that covers a number of key student systems.		The Global Academic Registrar is responsible for authorising user access to SAS and its associated databases and interfaces [including CRM Recruit, Faculty Self Service and OBI] and for auditing access every three months as recommended by the University's Internal Auditors.	See 2.6 to 2.10 above
SAS Registry Interface	System to support student onboarding to the University.	Student photo, record of student's identity check		
Student Information Desk (SID) [Tribal]	Enquiry, case and queue management system	Details of student well-being cases.		Case file destroyed by staff in line with retention policies.
Student Portal [Collabco]	Student access to University online resources.	Access data only.		No retention policy required.
Syllabus+ [Scientia]	Class timetabling system	Details of classes and the students and staff assigned to them.		Retained in line with University retention policies.
Turnitin		Copies of students' assignments		
WPM	Online payments			
Student files in paper-based systems			Paper student files must be stored in secure locked cabinets managed by RAS. The Academic	

System Name [Supplier Name]	Description	Holds	Access	Retention Management
			Operations Manager for the campus must be informed of the names of these designated individuals and will arrange annual audits of access and spot checks. Student files should, wherever possible, be viewed in the room where the records are held. All files removed from the secure storage facility must be signed out and in, and must be returned as soon as possible, with follow-up by the designated responsible person and the RAS Liaison Officer if not returned within one week.	
Digital student files and student case files held in semi-structured systems such as shared folders on the S drive, or Microsoft 365			Electronic student files, case files or service records about identifiable students must be held on restricted access shared drives or information management systems. Access permissions to these drives or systems must be authorised by the Global Academic	

System Name [Supplier Name]	Description	Holds	Access	Retention Management
			Registrar, with assistance from a designated member of staff.	
Digital files held in semi-structured systems such as shared folders on the S drive or Microsoft 365 held by the relevant directorates and divisions, primarily: • **Strategic Planning, Performance and Projects Directorate** • **Research Engagement Directorate (RED)** • **Registry and Academic Support (RAS) Directorate**		Internal spreadsheets and reports (e.g. from Banner) used for: • Internal management information and reporting • Data quality and process improvement • Support for statutory reporting • Budget management and reporting • PGR extensions Legal agreements with students, including: studentship agreements; IP assignation agreements; graduate apprenticeship agreements; non-disclosure agreements. Records of student engagement with / attendance at events such		

System Name [Supplier Name]	Description	Holds	Access	Retention Management
		as training workshops and open days.		

Table 1: Overview of information systems containing information about students, prospective students and applicants, and former students