



SECRETARIAT & LEGAL SERVICES
ACADEMIC POLICY SUMMARY SHEET

NAME OF ACADEMIC POLICY:	Academic Archiving Policy
PURPOSE OF POLICY AND WHOM IT APPLIES TO:	<p>The policy defines the University's approach to the archiving of its academic-related documents in all forms, including print-based and electronic, and related matters: the retention, secure storage and secure disposal of documents.</p> <p>The policy applies to all staff.</p>
RESPONSIBLE BOARD/ COMMITTEE WITH ROUTE OF APPROVAL:	<p>Academic Board approved the revised policy on 11 June 2008.</p> <p>The revised policy was approved by the Programmes & Standards Committee on 8 February 2008 and the Academic Affairs Committee on 16 April 2008.</p>
LEAD STAFF MEMBER RESPONSIBLE FOR ITS UPDATE:	Deputy Academic Registrar (Academic Business Services)
PERSONS CONSULTED IN DEVELOPING POLICY:	The revised policy was considered by members of Academic Board and the Academic Affairs and Programmes & Standards Committees.
POLICY FINALLY APPROVED BY:	Academic Board on 11 June 2008
DATE OF IMPLEMENTATION:	1 st July 2008
DETAIL OF DISSEMINATION:	The revised policy was circulated to relevant staff in July 2008 and is available on the Secretariat's portal site
PROPOSED DATE OF REVIEW	To be confirmed.
SECRETARIAT OFFICER – MAIN CONTACT:	Officer to Programmes & Standards Committee
DATE:	2 July 2008



UNIVERSITY OF
LINCOLN

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ACADEMIC ARCHIVING POLICY

This document defines the University's policies on the archiving of all academic-related documents in all forms, including print-based and electronic, and related matters: the retention, secure storage and secure disposal of documents.

The Policy consists of the following three sections:

1. Academic Board and its Committees
2. Boards of Examiners
3. Other Documents and Data on Students

Appendices:

1. Data Protection and Students' Academic and Personal Records – some guidance notes
2. The Freedom of Information Act 2000 and Legal Obligations for the University of Lincoln - some guidance notes

1. Academic Board and its Committees

1.1 Certain of the committees of the Academic Board deal with and minute decisions on named students. The policies relating to

the Research Degrees Committee and Faculty Research Degrees Boards, and
Boards of Examiners

are included in sections 2 and 3 following.

1.2 Certain of the committees of the Academic Board deal with and minute named employees and former employees of the university, and persons outside the university. These are:

the Committee of Professors and the College of Professors,

the External Examiners' Committee, and

nominations to Academic Board for honorary awards.

Documents relating to these committees are held in line with procedures used by the University's Human Resources Department.

1.3 Documents which have been presented to Academic Board and its committees, other than those referred to above, are in the public domain. The remainder of this section (1.4 to 1.8) relates to these public documents only.

1.4 Minutes of Academic Board relating to nominations for honorary awards will be couched in a way to disguise the identity of the nominees.

1.5 The official minutes of Academic Board and its committees, formally signed as accurate by the respective chairs, will be maintained as minute files by the Secretariat & Legal Services. The files will be kept in perpetuity.

1.6 Documents relating to nominations for honorary awards will be tabled as appropriate at meetings of Academic Board, and collected in by the officer to the Board at the end of the meeting. The officer will securely dispose of all copies of the documents, except for one working copy for each nominee accepted by the board. This working copy and any subsequent related documents will be securely disposed of immediately after the nominee has received his or her honorary award. The officer to Academic Board will maintain an up to date database of recipients of honorary awards.

1.7 Official copies of all other documents considered by Academic Board and those of its committees under consideration here will be kept by Secretariat & Legal Services for six years. In September of each year, Secretariat & Legal Services will dispose of all such paper and electronic records in its possession which are over six years old. (Thus, for example, in September 2004, all records up to and including academic year 1997/98 will be disposed of). The only exception permitted to this practice will be in instances where the Academic Board explicitly directs the Secretariat & Legal Services to keep specified Academic Board documents in perpetuity.

1.8 Because the documents referred to here are public, individuals are entitled to keep copies of them however they wish, for their own purposes.

2. Boards of Examiners

2.1 Certain of the committees and boards of the Academic Board consider and minute decisions on named students:

the Research Degrees Committee, when it acts as a board of examiners to consider students' research proposals and progress reports, and to confer research degree awards, and

Boards of Examiners.

2.2 The deliberations of the above committees and boards are informed by electronic and paper documentation provided by individual students or prepared by Faculties¹ and/or the Academic Registry on individual students. Following meetings, the documents (originals where appropriate) will be kept by the Academic Registry for six years. In September of each year, the Academic Registry will securely dispose of all such documents which are over six years old. Paper documentation is retained in perpetuity for the following groups of students:

- i) on-campus students prior to the introduction of the QLS student records system
- ii) students whose unit information was not entered onto QLS.

2.3 The decisions of the above committees and boards are recorded in electronic records on individual students maintained by Faculties and the Academic Registry, in signed minutes of their meetings, in individual letters or certificates sent or presented to students, and in pass lists posted on notice boards. Electronic student records and originals of minutes formally signed as accurate by the chair will be maintained as archives in perpetuity by the Academic Registry.

2.4 With the exceptions shown in 2.5 and 2.6 only, it is the responsibility of individual members of the above committees and boards to return all documents received in the course of their membership immediately after meetings to the officer to the committee or board. The officer will immediately and securely dispose of all such returned documentation.

2.5 At meetings of the above committees and boards, the chairs are empowered to give permission to individual members to take specified documents away from meetings, for purposes of follow-up work related to the meetings' business. When so allowed, it is the responsibility of the member to return the documents to the officer to the committee or board, as soon as s/he has completed the follow-up work. The officer will immediately and securely dispose of all such returned documentation.

2.6 All members of the above committees and boards will receive copies of the minutes from the officers. These copies of minutes are confidential and it is the responsibility of individual members to maintain confidential reference files of minutes and to dispose securely of minutes as soon as the student cohorts showing in them have graduated.

- 2.7 There are three matters which relate to the responsibilities of boards of examiners and which affect the outcomes of boards, but which do not feature as documents at their meetings:
- students' examination scripts,
 - students' assignments and other non-examination work, and
 - documents relating to academic appeals.
- 2.8 Students' examination scripts will be kept by the Faculty with responsibility for marking them for one year beyond the date of the student leaving the University (unless required to be kept for longer by a professional body), and then disposed of securely. Copies of scripts made for the purposes of double marking, moderation or external examiner scrutiny will be returned after use to responsible officers within the Faculty for immediate secure disposal. Other student artefacts should be archived to comply as far as is possible with the spirit of this policy. Notwithstanding this principle, examples of student examination scripts may be kept for quality assurance purposes for a period of time necessary to discharge departmental responsibilities.
- 2.9 University Regulations require students to keep all returned and marked coursework until after the final assessment of the award. Faculties will give reasonable notice to their students of dates by which marked coursework can be collected from designated venues. Any coursework not collected by the duly notified dates will be securely disposed of. Copies of assignments and other paper documents made for the purpose of double marking, moderation or external examiner scrutiny will be returned after use to responsible officers within the Faculty for immediate secure disposal. Notwithstanding this principle, examples of student coursework may be kept for quality assurance purposes for a period of time necessary to discharge departmental responsibilities.
- 2.10 University Regulations or custom and practice frequently dictate that a copy of a student's dissertation or thesis be lodged in a university learning resource centre or library. No student work shall be lodged in the University Library without the student's prior consent. Documents so lodged are in the public domain until such time that the relevant Regulation or custom and practice require their removal. All other copies of dissertations and theses, and all copies of dissertations and theses not required to be lodged in the public domain, will be dealt with as "coursework", under paragraph 2.9 above.
- 2.11 Documents relating to academic appeals are presented to the Academic Appeals Officer by individual students. Further documents relating to an appeal can be generated as the case is processed. Following resolution of an appeal, through all the stages of the process which it has involved, the documents (originals where appropriate) will be kept by the Academic Appeals Officer for six years. In September of each year, the Academic Appeals Officer will securely dispose of all documents relating to academic appeals which were resolved more than six years previously. All copies of the documents, issued as necessary to those involved in the appeal, will be returned to the Academic Appeals Officer immediately after use, for immediate secure disposal.

3. Other Documents and Data on Students

- 3.1 It is University Policy that the University will not keep information, files, documents, or data on students unless there is a demonstrable need. Within this policy, it is necessary for certain staff and sections of the University to maintain documents or data on students, beyond the requirements of Boards of Examiners (section 2).
- Electronic and paper documents relating to the enrolment and registration of individual students, necessarily maintained by Academic Registry, Faculties, Computer Services and Learning Resources.
 - Documents and files on individual students necessarily kept by Programme Leaders, Academic Tutors, tutors and faculty administrators in the course of their day-to-day interactions with students.
 - Documents and files on individual students necessarily kept by the various sections of Student Services in the course of their day-to-day work with students.
 - Documents and files on formal student complaints maintained by the Faculty and at University Level, by the University Secretary.
- 3.2 All documents and files referred to in section 3.1 are confidential and it is the individual responsibility of all staff concerned to keep the contents and scope of such documents and files confidential and to a minimum, until the point that these policies require their secure disposal.
- 3.3 Electronic records of student registration data will be maintained in perpetuity by the Academic Registry. Paper documents relating to students' registration and enrolment will be scanned and retained in an electronic document management system in perpetuity. The original paper copies of such documents will be kept by those responsible for generating them for six years following the end of the registered student's study. In September of each year, responsible officers of the Academic Registry, Faculties, Computer Services and Learning Resources will securely dispose of all such paper documents due for disposal under this policy which relate to a previous academic year or registration period.
- 3.4 With the exception of personal references and information on students' programmes, documents and files on students maintained within faculties will be kept only for such time that the individual student is registered on a programme with the University. It is the responsibility of individual faculty members to dispose securely of all documents and files on students who are no longer with the University.
- 3.5 It is University policy that references provided for current or past students must be factual together possibly with a narrative statement from an academic member of staff. The factual elements of a reference will confirm the dates of registration, the name(s) of the programme(s) enrolled onto, and the title(s) and date(s) of award(s) achieved with classification(s) where appropriate. The narrative element of references are not obligatory. If no academic member of staff is willing or able to provide a narrative, then the reference will be factual only. If an academic member of staff does provide a narrative, then it must follow the guidelines provided by the University

- 3.6 Academic Registry maintain an electronic historical archive of the structure, content and other details of the University's programmes. The archive will contain programmes which have been substantially changed through revalidation or have been discontinued. The source information for the archive will be the QLS computerised student record system and its predecessor systems as outlined in section 4 of Appendix 1. The archive will be regarded as being in the public domain and will be used, amongst other things, to provide details to graduates and diplomates on the programmes they studied.
- 3.7 With the exception of financial and legal documents, Student Services will keep documents (originals where appropriate) generated in the course of their day-to-day work or through the processing of formal student complaints, for six years. In September of each year, responsible officers will securely dispose of all such documents which are over six years old. All copies of such documents necessarily issued to colleagues outside Student Services who are involved with the matter in question, will be returned to a responsible Student Services officer immediately after use, for immediate secure disposal.
- 3.8 Certain documents relating to students have financial or legal dimensions: the policies on their archiving are kept by the relevant University departments. Included here are:
- accommodation and other agreements made with the Estates Department,
 - dealings with Student Services over student loans, hardship funds and other forms of student finance, and
 - dealing with Financial Services over fees and other financial matters.
- 3.9 European Social Fund academic records and documentation need to be kept until 31 December 2022.

Data Protection and Students' Academic & Personal Records

Some Guidance Notes

1. Introduction

The Data Protection Act 1998 introduces a comprehensive regime governing the processing of, and access to, personal data. For the purposes of the Act, personal data is information relating to living individuals that is stored in automated processing and retrieval equipment (including SMS, Word files or email) or is stored in a manually controlled 'hard-copy' filing system (such as individual student files held in faculty offices or appeal files held in the Academic Registry).

2. Data Protection Principles

The Act establishes certain guiding principles relating to personal data, which includes data about individual students. Personal data must:

- be fairly and lawfully processed;
- be processed for limited purposes;
- be adequate, relevant and not excessive;
- be accurate;
- not be kept longer than necessary;
- be processed in accordance with data subject's rights;
- be secure;
- not be transferred to countries without adequate protection.

Processing of personal data includes the disclosure and dissemination of personal information. The Act puts into statutory form the kinds of confidentiality obligations that the University, in practice, should automatically observe in respect of its students.

In addition, the loss or destruction of certain kinds of personal data, for example individual student programme and attainment records, can be an infringement of students' rights as data subjects. Accordingly, considerable care needs to be taken in the handling of manual records and the backing-up of electronic records. The reorganisation of departments and faculties and the upgrading or replacement of information systems pose serious risks for the maintenance of key personal data.

3. Data Subject Access

As a general rule - there are exceptions - students, as data subjects, have the right to receive copies of their personal data. The right of access is not automatic as a request has to be made to the University's designated data protection officer and a fee of up to £10 has to be paid. The University will respond to the request within 40 calendar days.

However, once a proper request has been made, a student is entitled to receive a considerable amount of personal information. And the access right is not limited to factual information, but includes expressions of opinion and intention. For this reason, all those involved in the creation and processing of personal data must be scrupulous in adhering to the principles of data protection.

4. Student Personal Data and Computerised Student Records Systems

QLS contains the HE enrolment, progression, assessment and completion records of individual students from 1996 onwards. Further Education records are maintained on the SMART and MAYTAS information systems. SMS was the University's previous HE student record system and is still the source for historical student data going back to 1995 and up until the full implementation of the QLS enrolment record. The SIS (Student Information System) which preceded SMS is still used for queries prior to 1995; the previous admissions system called SAS (Student Admissions Systems) was used prior to 1995 and is still available but there are no records of its recent use for archive retrieval purposes. On a similar basis PDS is still the source for historical Curriculum Data. Students have access rights to their personal data contained in QLS/SMS//SMART/MAYTAS, provided that disclosure does not infringe the confidentiality entitlements of third parties. In the unlikely event that third parties are identified in an individual student's QLS/SMS/SMART/MAYTAS record, then, in most circumstances, the third party data can easily be removed from the copy to be provided to the student. Therefore, the fact that a student's personal data contains third party information is not, in practice a bar to the student receiving a copy of QLS/SMS/SMART/MAYTAS data. Where a deletion of third party information might be necessary, this will be undertaken by the University's data protection officer.

5. Student Personal Data and 'Hard-Copy' Files

The Faculties and the University maintain filing systems containing student personal data for a variety of purposes. Typically, such files might contain enrolment forms, transcripts of marks, pro-forma references, assignment front-covers, sick-notes, records of examination attendance, details of mitigation claims, details of allegations of academic offences and appeals paperwork. Again, subject to the non-identification rights of third parties, students will have subject access rights to most of this information, with the exception of references.

6. Student Personal Data Maintained By Academic Staff Outside Faculty and Academic Registry Files

Apart from references, most of the electronic and manual information maintained as part of a filing system by staff from which individual students can be identified has access rights attached. The sources include:

- academic tutor file notes of interviews with students;
- seminar lists and registers;
- file copies of mark lists, in whatever stage of finalisation;
- word-processor files;
- spreadsheet files;
- copies of emails, both received and sent.

Records on graduates or diplomates accessed or used by Marketing and Recruitment Services or by the Alumni Association will involve only former students' names, addresses, and the title(s) and date(s) of award(s) achieved.

7. Minutes of Boards of Examiners, Including the Extenuating Circumstances Panel and Academic Offences Committee

The minutes of examination boards that identify a student by name, or some other identifier such as enrolment number, have subject access rights attached. A disclosure must not identify third parties, but in most circumstances it is a simple matter to erase the identity of a third party. Where third parties cannot be concealed in this way, disclosure is permissible where the third party consents to this.

8. Pass-Lists and Other Notification of Results

The University on occasion may publish pass-lists which have the effect of disclosing personal data to third parties in a public way. Therefore, individual students must not be named in pass-lists but identified by their examination number. Other notification of results, such as in results letters or the handing back of work must be made to the student in person. Leaving marked work outside staff offices for students to collect almost certainly infringes a student's right not to have personal data indiscriminately disclosed. Consent to disclosure can be implied in certain circumstances, for example where student gives a member of staff as a referee. In other cases, express consent should be sought for disclosure, which would include a situation where an academic advocate meets both student and parent for a counselling session.

9. Examination Scripts

Examination scripts are exempt from the subject access rules which means that under the Act a student is not entitled to have a copy of his or her script. However, a student does have the right to receive a copy or summary, in intelligible form, of comments made by internal and external examiners on a script.

10. Student References

A student cannot require, under the Act, the University to provide him or her with a copy of a confidential reference sent to a third party. However, the University can be asked to disclose information in an educational reference provided on a student by a third party, provided the confidentiality of the individual - but not necessarily the organisation - is not breached. The effect of this is that a student may approach the recipient of a University academic reference to seek information about its contents. It is likely that if the individual sender can be anonymised, then the student will be able to read what has been written in the reference.

11. Further Information

The University's Data Protection Officer can provide detailed information about Data protection Legislation.

The Freedom of Information Act 2000 and Legal Obligations for the University of Lincoln.

Some Guidance Notes

1. Introduction

The Freedom of Information Act 2000 is intended to promote a culture of openness and accountability of the University of Lincoln by providing people with rights of access to the information held by it. It is expected that these rights will facilitate better public understanding of how the University of Lincoln carries out its duties, why it makes the decisions it does and how it spends public money.

Who and what does the Act apply to?

The Freedom of Information Act applies to **all** information **held** by the University of Lincoln, therefore the archiving and destruction policy is essential in limiting the scope of material the University would need to disclose in response to a request.

Access to environmental information will be dealt with according to the provisions of the Environmental Information Regulations and access to personal data will continue to be dealt with under the provisions of the Data Protection Act 1998.

2. University Obligations

The Act creates two principal obligations for the University of Lincoln, from which other obligations stem:

- The University must adopt and maintain a publication scheme, setting out details of information it will routinely make available, how the information can be obtained and whether there are any charges.
- From 1 January 2005 the University of Lincoln must comply with requests for the information that it holds unless an exemption from disclosure applies. The University will normally have a maximum of twenty working days to respond to the request; however there are circumstances when this time limit can be extended.

3. Publication Scheme

Under the Act, the University is required to produce, maintain, and disclose in accordance with a publication scheme. This scheme will set out what kinds of information the University will proactively make available and how it will do it.

The University's publication scheme has been approved by the Information Commissioner.

A publication scheme is not a list of documents, but describes 'classes' or 'kinds' of information (such as minutes, reports etc.). It may also prescribe a charge for providing the information, particularly if the university already charged for providing that information before the introduction of Freedom of Information Act.

4. Requests

From 1 January 2005 any person will have the right to make a written request seeking specific information from the University and is entitled to be informed in writing by the University whether it holds information of the description specified in the request and to have that information communicated.

Procedure

When any member of staff receives a request for information, they must respond as soon as possible and not later than 20 working after receiving the request. Staff must do this either by filling in the form on the [FOI Information Request Recording](#) portal page or by e-mailing compliance@lincoln.ac.uk. The University will consider the request and reply.

The reply should confirm or deny whether or not the University holds the information and either provide the information requested or explain why it has not been provided, quoting an exemption under the Act.

A “request for information” referred to in the Act is any request which:

- is in writing (which includes transmission by electronic means, e.g. e-mail or fax);
- is received in legible form;
- is capable of being used for subsequent reference;
- states the name of the applicant and an address for correspondence;
- describes the information requested.

5. Fees

The University may charge a fee for processing a Freedom of Information access request. The fee will be calculated in line with the [fees regulations](#) published by the Department of Constitutional Affairs. Under the Act, fees may be charged in respect of the time spent efficiently locating or copying records, based on a standard hourly rate. No charges may apply in respect of the time spent by the University in considering whether information can be released. If a fee is required, the limit of 20 working days will be extended by up to three months until the fee is paid.

6. Exemptions

Whilst the Freedom of Information Act creates a right to request specific information held by the University, it also creates a number of exemptions from that right. These have the effect of permitting the University to withhold some or all of the information requested, where that information fits the terms of one or more of the exemptions.

Example exemptions relevant to the university:

- Information intended for future publication.
- Personal information - access to personal data will continue under the provisions of the Data Protection Act 1998.
- Personal data about other people cannot be released if to do so would breach the Data Protection Act.
- Information accessible to the requester by other means.
- Intellectual Property Rights

7. Complaints

The University has devised a fair and impartial complaints procedure and may be used by any person.

- Where the outcome of a complaint is that the procedures within the University have not been properly followed by the University’s staff, the University should apologise to the applicant.
- Who perceives that the University is not complying with its own publication scheme?

- Who considers that their request has not been properly handled, or who are otherwise dissatisfied with the outcome of the consideration of their request.

The University may set and publish its own target times for dealing with complaints, but these should be reasonable, defensible, and subject to regular review.

Complaints will be handled by a person who was not a party to the original decision.

8. Appeals

An applicant is entitled to appeal to the University against its decision regarding a complaint.

An applicant is entitled, under the Act, to appeal directly to the Information Commissioner's Office.

9. Responsibilities of Staff

When communicating any decision made in relation to a request under the Act's general right of access, the complaints procedure details should be provided.

Any written reply from the applicant (including one transmitted by electronic means) expressing dissatisfaction with the University's response to a valid request for information should be treated as a complaint.

In all cases, a complaint should be acknowledged and the applicant should be informed of the University's target date for determining the complaint.

Records should be kept of all complaints and of their outcome.

Where the outcome of a complaint is that information should be disclosed which was previously withheld, the information in question should be disclosed as soon as practicable and the applicant should be informed how soon this will be.

Where the outcome of a complaint is that an initial decision to withhold information is upheld, or is otherwise in the University's favour, the applicant should be informed of his or her right to appeal to the Information Commissioner.