

## The Student Record

**Purpose:** This paper offers recommendations about the content, retention and/or destruction of, as well as access to, the student record both in paper and electronic form.

### 1. General Principles for Data Management:

- 1.1 The following general principles for data management have been established in consultation with Rachael Maguire:
  - i) Personal information should not be retained for longer than necessary and not normally beyond the average life span of data subjects. Data should only be retained for a longer period where there are sound business reasons, e.g. historical importance.
  - ii) Access to information should be limited to those who need it, particularly where the data subject is likely to deem it to be of a sensitive nature.
  - iii) Data of a sensitive nature should not normally be retained for more than seven years, i.e. this represents the maximum statutory period during which an individual can seek legal redress under the *Limitations Act* (1980, c.58).
  - iv) Individual offices should determine the most appropriate timescale for data retention based on an assessment of business reason and potential risks. Decisions on timescales should be recorded, n.b. this is discussed further in section 7 below.

### 2. What the School's website currently says about the "student file":

- 2.1 The School's DPA website includes a page about "student files" (attached as [Annex A](#)). The statement includes the following points:
  - a. There is only one file for each student, even though he or she might start as an undergraduate and finish as a postgraduate;
  - b. Files contain application forms, references supporting application, academic records showing progress at the School, and accumulated correspondence;
  - c. Access to student files is restricted to those who have a direct interest in them;
  - d. After a student leaves the School the personal file is retained indefinitely.

### 3. The changing nature of the student record:

- 3.1 A central record exists for all students in at least two parts: a paper "green" file and an electronic record in SITS and/or LSEforYou.
- 3.2 With the advancement of e-technology, attendance records (UG only) and progress reports (UG and PGR) are now held in LSEforYou. Similarly, virtually all correspondence with students now takes place by email via individual or generic LSE email accounts. Hard copies of email exchanges or file notes are added to the green file only rarely, e.g. requests by a Dean or the Academic Registrar.
- 3.3 Standard registry-type forms, e.g. change of class or course, are no longer placed in the green file. However, all important information (including appropriate codes) is recorded in SITS. The forms are retained separately and can be accessed (if necessary) for at least one year before being destroyed. Students are notified of the outcome via email (cc: relevant parties as appropriate). The confirmation emails are retained in email archive folders.
- 3.4 The system of filing described in 3.3 was first implemented in the Graduate School Office and has subsequently been replicated across the SSC and RSU. Consequently, the paper green file for most current students is typically limited to admissions information, i.e. an application form and supporting references.
- 3.5 In the light of paragraphs 3.1-3.4, the webpage about the student record needs updating. [action: MM to arrange]

### 4. Standard and non-standard elements of the student record:

- 4.1 In accordance with the general principles in section 1 above, it is necessary to distinguish between those elements of the student record that should be retained indefinitely and those elements that should be retained for fixed periods of time only.
- 4.2 It is recommended that the following *standard* elements of the student record be retained indefinitely:

- i) Admissions data, including references – paper file
- ii) Student details: name, photo, date of birth, nationality, etc. – SITS
- iii) Programme and course data, results achieved, awards made – SITS
- iv) Class / tutor progress reports (undergraduate students only) - LSEforYou
- v) Annual progress reports (PhD students only) – paper file<sup>1</sup>

4.3 It is recommended that the following *non-standard* elements of the student record be retained for fixed periods of time only: [n.b. the elements are divided into two categories based on the length of time they should be retained prior to their destruction.]

#### 4.3.1 Category 1: retain for current session plus one year

Requests made on the following standard forms:

- Exam re-entry
- Overseas exam re-sit
- Capped course
- Late course change
- Class change

#### 4.3.2 Category 2: retain for current session plus three years

Requests made on the following standard forms:

- Change of study mode (FT/PT)
- Fee status re-classification questionnaire
- Transfer programme
- Exam deferral
- Interruption of study
- Field work (PRG only)
- Extension to maximum period (PGR only)
- Withdrawal from study

## 5. Additional information of a personal and/or sensitive nature

5.1 The ARD holds a variety of information about some students, which they would likely deem to be of a personal and/or sensitive nature. This information is held separately from the green file both to limit access to those with bona fide reasons and, ultimately, to facilitate destruction.

### Mitigating circumstances

5.2 Many students submit statements of mitigating circumstances with supporting documented evidence for consideration by examination boards.

5.3 A generic code is recorded in SITS (on a screen with restricted access) simply to indicate that a student has submitted a statement in a given year. A short factual summary of the circumstances is also logged in SITS to facilitate consideration by examiners. The summaries should be deleted one year after a student has completed her/his studies.

5.4 The original statements and documents are retained until three years after completion of studies.

### Special Exam Arrangements

5.5 Most students with disabilities apply for special exam arrangements when establishing an Individual Student Support Agreement (ISSA) with the Disability Office. All records (electronic and paper) and supporting documentation relating to the ISSA are held in the Disability Office.

5.6 A small number of students without disabilities apply for short-term special exam arrangements using a standard form. The original forms and supporting documented evidence are retained for three years in the SSC.

5.7 Students are notified of the outcome by email (cc: the Disability Office if appropriate). A generic code is recorded in SITS (on a screen with restricted access) simply to indicate that a student has received special arrangements in a given year. The exams office retains a spreadsheet of all special exam arrangements on a rolling seven-year basis.

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<sup>1</sup> The RSU has recently submitted a business case to establish an on-line progress report screen in LSEforYou.

### Student progress

- 5.8 Students who have failed courses and are thereby unable to progress to the next year of their studies must apply to the Student Progress Panel (SPP) if they want to receive repeat teaching, or to progress against the rules.
- 5.9 The application process and outcomes are recorded in SITS. Students are notified of the outcomes by email (cc: relevant parties as appropriate).
- 5.10 A separate SPP file is created to hold all documents and correspondence, including hard copies of all emails. These files are retained until three years after a student has completed her/his studies.

### Appeals

- 5.11 A small number of students appeal (by email or letter) against examination board decisions.
- 5.12 Separate files are created to hold all documents and correspondence. They are retained until three years after a student has completed her/his studies, and then destroyed. If a student appeals to the Office of the Independent Adjudicator (OIA), the file is retained until seven years after completion.
- 5.13 Students are notified of the outcomes by official letter, which is retained on the student file indefinitely.

### Assessment Offences and plagiarism

- 5.14 A small number of students are alleged to have committed an assessment offence such as plagiarism.
- 5.15 Separate files are created to hold all documents and correspondence relating to the allegation. They are retained until seven years after a student has completed her/his studies, and then destroyed.
- 5.16 Students are notified of the outcomes by official letter. Instructions about how each possible outcome of these allegations shall be recorded and whether it should be placed on the green file are provided in the relevant Regulations. [n.b. the School solicitors have recently indicated that a record should only be placed on a student's file where the allegation is confirmed.]

### Financial Support applications

- 5.17 Students who apply for financial support are required to provide detailed personal and financial information (and, if required, references) to establish need and/or merit. As the details are intended solely to obtain financial support, they should not be placed on the green file.
- 5.18 Since 2006/07, the FSO creates individual files for students who are successful in their application. FSO files are retained for three years after students complete their studies, and then destroyed. A record of successful applicants is also created in the FSO database.
- 5.19 The FSO also creates individual files those who register at the School despite being unsuccessful. These are retained until one year after a student has completed her/his studies. All other applications are destroyed within six months of the start of the subsequent academic session.
- 5.20 Students are notified of the outcome by official letter. Where successful, a copy of the official letter is placed on the green file and in the corresponding named scholarship folder (if applicable).

## **6. Email correspondence**

- 6.1 As noted in 3.2 above, virtually all correspondence between students and the ARD now takes place by email via individual or generic LSE email accounts. Correspondence includes queries/responses and requests/confirmations about a wide range of issues, including course choices, exam arrangements, degree (or other) regulations, and results.
- 6.2 It is recommended that emails should normally be retained in archive folders (according to academic session) for the current session plus three years.

## **7. Retention Schedules**

- 7.1 As noted in 1.1 (iv), one of the general principles of data management is that individual offices should determine the most appropriate timescale for data retention based on an assessment of business reason and potential risks.
- 7.2 Timescales need to be agreed for each element of the student record, additional information of a personal and/or sensitive nature, and email correspondence. [action: SU and MM to agree]
- 7.3 Once agreed, these should be recorded in retention schedules that document the lifespan of different type of records. Retention schedules for academic department records appear on the following webpage: <http://www.lse.ac.uk/collections/FOI/recordsManagement/retentionschedules.htm>.

## **8. Improving access to the student record**

- 8.1 To varying degrees, academic staff can access each element of the student record.
- 8.2 Those who have a direct interest in a student can access her/his paper green file, n.b. an established list is included in Annex A.
- 8.3 All permanent members of staff can access the LSEforYou records for students they teach and/or for students registered on a degree in their departments. Departmental Tutors and the Deans have access to the LSEforYou records for all students.
- 8.4 Departmental administrators and some academic staff (including the Deans) have 'read only' access to much of the information held in SITS.
- 8.5 It is recommended that a guidance note be produced which identifies the different elements of the student record, where they are located, and how they can be accessed. The note will need to include a clear explanation about how some of data is stored in SITS, e.g. the use of codes and the 'note pad'.
- 8.6 The guidance should also identify circumstances where it might be appropriate for staff in academic departments to add correspondence (including emails) and/or file notes to the central student record.  
[action: MM to arrange]

## **9. The Future of the paper 'green' file**

- 9.1 In holding a diminishing part of the student record, the current paper 'green' file system does not meet the School's objective to provide an efficient, user friendly and cost effective service. The planned expansion in student numbers (primarily for 1-year graduate programmes) will lead to a proportional increase in the number of files needing to be stored and maintained. With limited our on-site storage space (even with a renovated Dead Registry), the costs for off-site storage and retrieval will inevitably increase.
- 9.2 The paper file system should be replicated in an electronic format with a view to completely eliminating the paper system in future. This would require three elements coming together:
  - i. An electronic filing system is needed. The 'Filenet' system which the Secretariat has been using for the past seven years is currently under review. Although we do not currently use this system, the ARD is providing 'users' input to the review, and will promote the need for a system that is compatible with SITS (e.g. to enable the development of electronic student files). Colleagues will be kept informed as the review progresses to ensure that we can provide effective input on any future developments in this area,. A business plan will need to be developed if there are significant changes to / replacement of 'Filenet'.
  - ii. The purchase of the SITS "Document Manager" component would enable us to import/ export electronic files and store them as document records within the client server. The link between electronic files and SITS is fundamental to our Divisional SITS strategy. We will need to discuss if/when we should ask Tribal for a demonstration of the current version (7.4.0) of this component and a full price quotation.
  - iii. To facilitate access by academic staff, we would also need to establish a user-friendly way to view e-files: for example, via SITS, LSEforYOU or an Oracle system.
- 9.3 While the likelihood of these three elements coming together quickly are remote, it would seem sensible to see how the Secretariat review progresses in respect of (i) and to start investigating the potential of (ii).

M Maloney  
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## Annex: A

[see also: <http://www.lse.ac.uk/collections/dataProtection/studentFiles.htm>]

### **Student files**

There is only one academic file per student.

Student files are for the use only of those who have bona fide reasons for consulting them.

They must be returned by hand or in an envelope to the Student Services Centre (Ground Floor, Old Building) immediately after use. They should not be kept elsewhere unless absolutely necessary, and should never be left in unlocked rooms.

### **Statement on protection of data in students' personal files**

There is only one file for each student, even though he or she might start as an undergraduate and finish as a postgraduate.

Access to student files is restricted to those who have a direct interest in them:

- The Director
- Deputy Directors
- Deans
- The Secretary and Director of Administration
- The staff in the Academic Registrar's Division
- Tutors
- Conveners
- Departmental Tutors
- Class teachers
- Teachers named as referees by students
- Teachers who have other bona fide reasons for examining a file
- The School's medical staff

Files contain application forms, references supporting application, academic records showing progress at the School, and accumulated correspondence.

The School does not place any reference to specific political or religious beliefs or activities in personal files except where the subject has been raised at the initiative of the student. Reference to extra-curricular activity may be included on a file where relevant to a student's academic progress.

After a student leaves the School the personal file is retained indefinitely. Access to the file continues to be tightly restricted to the categories of staff set out above.

The medical records of students are kept entirely separate from their academic files and medical staff alone have access to them.

The School's practice in dealing with outside requests for information about current students (other than those from statutory bodies requesting e.g. confirmation that a named student is registered at the School) is to refer the request to the student, leaving it to him or her to decide whether to respond.