

WHAT IS A STUDENT RECORD?
A CASE STUDY BY KING'S COLLEGE LONDON

Pilot project compiled for the JISC (Joint Information Systems Committee)
Supporting Institutional Records Management Programme
November 2003

Clare Cowling
Records Manager

WHAT IS A STUDENT RECORD?

A CASE STUDY BY KING'S COLLEGE LONDON

Table of contents

Abbreviations

1. WHAT IS A STUDENT RECORD? BACKGROUND TO THE PROJECT

- 1.1 Introduction p.5
- 1.2 The King's context p.5
- 1.3 The JISC pilot project p.5

2. THE PROJECT'S AIMS

- 2.1 Terms of reference p.6
- 2.2 Project deliverables p.6
- 2.3 Other benefits p.6

3. METHODOLOGY

- 3.1 Overall coverage of the student record in King's p.8
- 3.2 Internal College procedures and policies p.8
- 3.4 External information gathering p.8

4. PROJECT FINDINGS: THE STUDENT RECORD AT KING'S

- 4.1 The student record database p.9
- 4.2 Documentation on named students held in other databases p.10
- 4.3 Future planning: the student portal p.10
- 4.4 College committees p.11
- 4.5 Student files maintained by School Offices and Academic Departments within each school p.11
- 4.6 Comparison of undergraduate and postgraduate student files p.14
- 4.7 Records maintained by academic/personal tutors/clinical advisers p.16
- 4.8 Records held for other purposes by school staff p.16
- 4.9 Duplication of information p.16

5. IDENTIFYING THE CORE RECORD

- 5.1 What does the "core record" mean? p.18
- 5.2 The core record for internal administration p.18
- 5.3 The core record for external requirements p.18
- 5.4 The core record for legal requirements p.19
- 5.5 Student expectation that information will be retained p.20
- 5.6 Long-term reference/research value p.21

6. RECOMMENDATIONS

- 6.1 The core record p.22
- 6.2 Non-core data which should be destroyed p.22
- 6.3 Deletion of electronic data p.23
- 6.4 Destruction of paper documentation p.24
- 6.5 Preservation of core data p.24
- 6.6 Long-term formats: summary of recommendations p.25

7. CONCLUSION

- 7.1 The project's benefits for King's p.27
- 7.2 The project's benefits for HEIs and JISC p.27

APPENDICES

Appendix I:	King's College London - administrative structure and responsibilities	p.29
Appendix II:	Project timetable: departments visited, contacts and dates	p.32
Appendix III:	The lifecycle of the student record	p.34
Appendix IV:	King's Records Disposition Schedule: relevant sections and recommendations for amendment	p.41
Appendix V:	King's College London policies and codes of practice	p.49
Appendix VI:	External requirements for data collection on students	p.50
Appendix VII:	Bibliography, including websites of higher education, professional and validating bodies	p.52

Abbreviations:

ACRS	=	King's College London Archives and Corporate Records Services
BMA	=	British Medical Association
CPD	=	Continuing professional development
DoMIS	=	Department of Management Information Systems, KCL
FE	=	Further education
HE	=	Higher education
HEI	=	Higher education institution
HEFCE	=	Higher Education Funding Council for England
HESA	=	Higher Education Statistics Agency
ISS	=	Information Services and Systems
JISC	=	Joint Information Systems Committee
KCL	=	King's College London
KILT	=	King's Institute of Learning and Teaching
MLE	=	Managed learning environment
QAA	=	Quality Assurance Agency for Higher Education
ULCC	=	University of London Computer Centre
UOL	=	University of London
PDP	=	Personal development plan
RDBMS	=	Relational database management system
RDS	=	King's Records Disposition Schedule
SIA	=	Systems Institution Academic

1. WHAT IS A STUDENT RECORD: BACKGROUND TO THE PROJECT

1.1. Introduction

In 1997 the Joint Information Systems Committee (JISC) commissioned a *Study of the archival records of British universities* (Elizabeth Parker and Christine Smith, Oct 1997). The study found (p.15) that the greatest volume of institutional records deposited in university archives, in equal quantities to governance records, was student records. This report thus brought into focus the huge storage implications for all universities, including King's College, which traditionally has taken the paper "student record" into its archives for permanent retention.

1.2. The King's context

1. The question "what is a student record?" was raised as a result of work on the King's Records Disposition Schedule, completed in 2002. The purpose of that schedule was to provide guidance to staff on the need to retain certain records for periods as specified by law, to destroy some records when no longer needed, and to archive records of permanent value. The schedule was to be used to ensure a consistency of record-keeping practice College-wide and to assist in compliance with the Data Protection Act 1998 and with preparations for the Freedom of Information Act 2000.
2. The student record was identified as **particularly** containing a vast array of materials with large variation between Schools as to what was being held. The Archives and Corporate Records Services (ACRS) undertook preliminary costings associated with various options for retention and media conversion and it was evident that the current general practice of retaining all documentation was not sustainable.
3. A working group was then established (in early 2003) to determine whether it would be possible to control costs associated with archiving through an evaluation of what should be kept. The working group tentatively identified the core information which should be kept, but agreed that a thorough survey was required to support its conclusions.

1.3 The JISC pilot project

1. The next step was to undertake a study of all records relating to students in King's College. The study was undertaken as part of the JISC's *Supporting Institutional Records Management Programme*. Under this programme JISC provided funding for a range of pilots, studies and initiatives aimed at supporting good records management practice within the UK HE and FE community. In January 2003 a bid by King's College to undertake a case study of student records was approved by the JISC.
2. It was anticipated that the project would build on and enhance the work already carried out by the College in developing its own records disposition schedule based on the JISC HEI Model Retention Schedule, and raise the profile of the College as an innovator in the creation of university-wide models for the management of information.

2. THE PROJECT'S AIMS

2.1 Terms of reference

The project was structured to

1. Attempt to define best practice in terms of access to, and retention and disposal of, all information, in any format, held about students throughout the College.
2. Offer a test of the 2003 revision of the HEI records retention schedule and a locally worked case study.
3. Take on board the recommendation of the King's College student record working group that the "core" student record elements, once identified, should be retained permanently in ACRS, while duplicate, ephemeral and non-core elements should be destroyed in accordance with best practice.
4. Carry out a thorough survey of the contents of student records and distribution mapping of all records containing information about identifiable students, regardless of storage media.
5. Offer an appendix developed on the basis of the institutional 'life cycle' contact of the student with the College, with cross-references to relevant sections to support easier access within the King's Records Disposition Schedule. Both the locally worked case study and the appendix were intended to constitute models of wide applicability.
6. Be managed by the Director of ACRS and overseen by a College steering committee including representatives of the Schools, Academic Registry and other administrative offices, with reporting lines to the ACRS Advisory Committee and the Data Protection Compliance Group.
7. Be undertaken by the Records Manager with input from the Records Assistant. The overall time frame was 5 months and the time allocated to the project was 5 weeks per project team member.

2.2 Project deliverables

Within the College it was felt that the project would

1. Support College strategy with regard to the streamlining of information handling.
2. Meet an identified need for more detailed guidance and clarity on handling student records.
3. Clarify policy on, and formulate procedures for, retention and storage of records relating to students.
4. Underpin staff training in these areas.
5. Support effective enquiry handling.
6. Support the existing work of the student record working party.
7. Support compliance with Data Protection and Freedom of Information.
8. Support internal and external audit.
9. Help set up a more distributed mapping of the King's Records Disposition Schedule.

2.3 Other benefits

More widely, it was hoped that the project, by providing a test of the HEI schedule via a model for a multi site, multi faculty institution, would:

1. Through a review of all records relating to students, provide a test of broad applicability of value to other HEI institutions.
2. Tease out a range of issues associated with specific disciplines, such as medicine and nursing, where the recording of continued professional development is significant.
3. Provide some solutions to the challenge of information handling in a multi site operation which has recently experienced a number of mergers.
4. Provide further proof of the validity of the life cycle approach to records management.

5. Provide a ground clearing exercise to support future research and decision making with regard to digital preservation and managed learning environments.
6. Demonstrate integrated handling of policy and support with regard to Data Protection and Freedom of Information.

3. METHODOLOGY

3.1 Overall coverage of the student record in King's

1. The lifecycle of the student record was mapped out in accordance with the administrative functions of the College (see **Appendix I: King's College London - administrative structure and responsibilities**).
2. Files, records and databases from each school, department and relevant administrative section were sampled for typical content and views sought about their short, medium and long-term utility and preferred methods of access and storage.
3. Meetings were held with staff in all those departments and offices which had some responsibility for collection and management of student data. A table of meetings will be found at **Appendix II: Project timetable: departments visited, contacts and dates**. Response from all staff was good; there was a real appreciation of the scale of the undertaking and the need for solutions to such problems as duplication and excessive retention of information. The timing of the project was, however, unfortunate; the majority of persons whose expertise was sought were initially absent on summer holidays and then, on return, heavily committed to the admissions and clearing processes.
4. A comprehensive listing of all relevant types of records and a mapping of their distribution was compiled as the project progressed; findings are at **Appendix III: Lifecycle of the student record**.
5. The location and nature of the core record, where duplication existed and the administrative and legal obligations for retention were established. It was intended that this in turn would enable the steering committee to improve the precision of the recommendations on content within the King's Records Disposition Schedule (see **Appendix IV: King's Records Disposition Schedule: relevant sections and recommendations for amendment**).

3.2 Internal College procedures and policies

1. The College website was trawled to find just what information students were expected to provide, the formats in which it is collected and maintained, and policies and procedures (such as the College Regulations) which affect record collection, processing and disposal. A summary of the main requirements for data collection and maintenance will be found at **Appendix V: King's College London policies and codes of practice**.
2. The findings of the student record working party and other relevant committees and working parties such as the student records database user group were examined for advice as to problems already identified and solutions suggested.

3.3 External information gathering

1. The policies of external bodies such as the Quality Assurance Agency (QAA), the Higher Education Funding Council (HEFC) and the Higher Education Statistics Agency (HESA) were examined to check on what their requirements for the gathering and maintenance of information on students.
2. The websites of other external agencies such as professional associations and validating bodies (e.g. the British Medical Association) were checked to see whether their continuing professional development requirements necessitated the retention of specific information on the student's progress.
3. Trends such as the QAA, Universities UK and the JISC's work on the student progress file, lifetime learning and implications for long-term access to student information were noted.
4. See **Appendix VI: External requirements for data collection on students** for a summary of external drivers.

4. PROJECT FINDINGS: THE STUDENT RECORD AT KING'S

4.1 The student record database

1. The current student database (known throughout King's variously as SIA, SI or SITS) has been live since September 1998. Purchased from SITS Vision, the database introduced relational database technology to the student system in the form of Oracle RDBMS (relational database management system).
2. The individual School Offices undertake the data entry on their students into the database. Various offices within the Academic Registry also input information. Academic Registry is also responsible for upkeep of the system and DoMIS provides database support. Academic departments and academic staff (with some exceptions) have read-only access rights.
3. Data transfer: most data, but not all, has been transferred from legacy databases to the current system.
4. The database is required to fulfil two functions:
5. To provide the data which KCL needs to fulfil its obligations to the student (e.g. date of birth, address, course details, marks, results).
6. To provide the data which external bodies e.g. HESA require now or will require in the future (e.g. applications data, monitoring of enrolments, wastage rates, parents' details, social class, final results summaries).
7. When the database was purchased it fully met the required system specification. The increasing requirements placed upon it for extra data have, however, added complexity to the system.
8. Data entered:
 - Personal Details:
 - Student identifier
 - Name
 - Date of birth
 - Address
 - Emergency contact
 - Nationality
 - Fee status
 - Ethnicity
 - Disability (only with permission of student)
 - Whether an applicant, a current student or an ex-student
 - Programme of Study
 - Student's degree programme
 - Year of first entry to the course
 - Year (level) at which the student entered the course
 - Start and expected end date
 - Student's entry qualifications.
 - Change/s of course of study.
 - Enrolment details
 - Annual permit to enrol
 - Academic Progress Record
 - Students normally have one progress record per award, which contains basic information on the student's course of study and intended award.
 - Award details
 - Examination registration
 - Calculation of award
 - Final classification (transcript).

9. New fields to be added
 - For widening participation statistics: parents' occupations are to be added, and probably religion and sexual orientation.
 - An area is being developed for monitoring progression reports electronically.
 - The database is also being developed to allow use of information for police investigations (e.g. where debt control agencies are involved).
10. Information not currently entered onto the database
 - Some scholarship/studentship/bursaries information (support awards are not entered).
 - Counselling/welfare information.
 - Assessments.
 - Careers information.
 - Alumni information.
 - Equality and diversity enquiries/complaints information.
 - Disciplinary information.
 - Students' library details.
 - Criminal Records Bureau check.
 - Changes in marks: not tracked.
 - Medical and Dentistry: number of hours put in for clinical placements.
 - Not yet operational: clinical assessments field (Medical and Dentistry).
 - Not yet operational: prizes field.
 - Postgraduate students: courses are not currently entered on the SIA system.
11. Long-term retention
 - The archiving facility on the database has not yet been rolled out; the entire database is still live.
 - Regular backups are made and stored off-site.
 - Investigations into digital preservation of the student database are about to commence through an examination of the facilities offered by external digital repositories such as the data archive maintained by the University of London Computer Centre (ULCC).

4.2 Documentation on named students held in other databases

The following additional databases have been set up to record information as follows:

1. Databases which have been created by central administrative departments to maintain major categories of information separately from, or to complement, the student database:
 - The *USB* or User Data Base maintained by Information Services and Systems to record use of library and IT facilities by students; it allocates passwords, pin numbers and registration information. It uses, as a basis, information downloaded from the student database.
 - The Finance Department maintains a database containing financial details on all registered students.
 - The *Raisers Edge* alumni database is compiled from data on excel spreadsheets provided twice yearly from Academic Registry. It is maintained by the External Department's Alumni Office, using, as a basis, information downloaded from the SIA system.
 - The *King's Connections* database of alumni who have agreed to act as advisers or contacts for students is maintained by the Careers Service. It was set up using information provided on request by ex-students.
2. Local databases (usually access or excel variants) set up on an ad hoc basis by various administrative offices to provide a quick method of accessing and tracking information on students that is specifically relevant to that office.
3. The schools:

- The Florence Nightingale School of Nursing and Midwifery requires more assessment details at module level than the SIA system can currently provide, so the school has set up its own database (ROSA) to record this extra information.
 - Other schools are also considering the purchase of customised databases to manage new initiatives such as e-learning.
4. Many ad hoc local databases have also been set up by schools and/or their academic departments to provide quick access to basic data on their students. Most of these are variants of access or excel.

4.3 Future planning: the student portal

1. The Academic Registry is currently planning the creation of a web-based portal which will provide staff and student access (for students it is called myKCL) to student information.
2. Students will be responsible for inputting and updating their own personal data.
3. The portal will also link with the virtual campus, the VLA (virtual learning access).
4. The portal will decrease work time for staff e.g. it will enable management to send out reminders to students centrally and will reduce multiple entry data input.
5. A standardised approach to both input and access is being developed e.g. to ensure standardised timing of input of registration.
6. It will be easier for staff (and students) to input and find information via the portal.

4.4 College committees

The following committees create and maintain (primarily paper) documentation on named students, including marks, special needs, financial details, disciplinary matters, misconduct:

- Academic Board
- Admissions Committee
- Disciplinary Committee
- Hardship Fund Committee
- Special Examinations Arrangements Committee
- Examination Appeals Committee
- Examinations Misconduct Committee
- Postgraduate Research Students' Committee
- College Board of Examiners
- Postgraduate School Boards of Examiners
- Undergraduate School Boards of Examiners
- School Programme Boards

The minutes and papers of all the above committees and boards are designated for permanent retention in ACRS.

4.5 Student files maintained by School Offices and Academic Departments within each school

1. There are ten schools in King's; each school, other than "single department" schools (Law, Nursing and Biomedical Sciences), supports a number of academic departments to run its courses. Both the School Office and the departments create and maintain paper "student files".
2. School and departmental student files held in ACRS were readily accessible to the project team, and this allowed a general overview of record-keeping to emerge. A search was conducted by the Records Assistant to locate files on the same student which had been deposited by both the department and the School Office to discover the level and nature of duplicate and unique information that existed between the two archived files. Files from two schools (School of Humanities and School of Physical Science and Engineering) were compared with their corresponding departments (English, History, and Electrical

Engineering). Information on students from undergraduate and postgraduate programs was compiled separately for each school/department combination.

3. The results of the comparisons may be viewed in the following table:
Student files comparison table – KCL Schools: School Office files and Academic Department files (samples examined in ACRS)

Undergraduate students: parallel files on the same student selected at random

School of Humanities: student A

School Office file	Department of History
Enrolment Forms	Enrolment Forms
Recommendation Letter	Recommendation Letter
Application Correspondence	Application Correspondence
*Address Change	*External Financial Application
*Notification of Award	*Transfer Documents
*Council Award Documents	*Exam Entry Form
*Transcript	*Undergraduate Report Forms
	*Class Award

School of Humanities: student B

School Office file	Department of English file
Enrolment Forms	Enrolment Forms
Course Change	Course Change
Leave of Absence	Leave of Absence
*Address Change	*Undergraduate Report Form
*Transcript	*Plagiarism Form
*Correspondence	*Course Registration
*Course Change	
*UA12 Confirmation Form	

School of Physical Science and Engineering: student C

School Office file	Department of Electrical Engineering
Enrolment Forms	Enrolment Forms
Prize Notification	Prize Notification
Award	Award
Transcript	Transcript
Subject Registration Form	Subject Registration Form
Correspondence	Correspondence
*Address Change	*Mark Sheets
*Financial Guarantee	*Safety Declaration
*Application	*UCAS Entry Form
*Letter Request Form	
*Course Change Form	

Postgraduate students: parallel files on the same student selected at random

School of Humanities: student D

School Office file	Department of History file
Enrolment Forms	Enrolment Forms
Transcript	Transcript
Postgraduate Report	Postgraduate Report
Offer and/or Reply Form	Offer and/or Reply Form
Department Offer Letter	Department Offer Letter

Letter of Recommendation	Letter of Recommendation
Application	Application
*Financial Guarantee	*Complete Award Form
*Financial Award	*Exam Application
*Award Form	*Confirmation
*School offer letter	*General Correspondence
*Statement of Qualifications	*Scholarships
*Undergrad Class Award Copy	

School of Humanities: student E

School Office file	Department of English
Enrolment Forms	Enrolment Forms
Change of Address	Change of Address
Postgraduate Offer	Postgraduate Offer
Transcript	Transcript
Postgraduate Report	Postgraduate Report
Offer and/or Reply Form	Offer and/or Reply Form
Application	Application
Marks Sheets	Marks Sheets
*Financial Guarantee	*Plagiarism Form
*Offer Letters (school and/or department)	*Letter of Recommendation
*Statement of qualification	*Writing Sample
	*Correspondence

School of Physical Science and Engineering: student F

School Office file	Department of Electrical Engineering file
Enrolment Forms	Enrolment Forms
Change of Address	Change of Address
Transcript	Transcript
Reply Form	Reply Form
School offer letter	School offer letter
Application	Application
Recommendation Letter	Recommendation Letter
Letter Request Form	Letter Request Form
*Financial Guarantee	*Diploma
*Department offer letter	*Postgraduate Report
*Transcribed Documents	*Mark sheet
*Financial Debt and Release Memo	*Examiners results
	*MSc Project Description
	*Research Project Assessment
	*General Correspondence
	*MSc Project Results

*Denotes material found on one file only

- The comparisons of undergraduate students' files indicate that there is some duplication of information in the two records. Copies of the enrolment form completed upon entering the College are kept by both the School Office and the department, although in one curious instance the Department of English did not keep all the enrolment forms for each student. Additionally, the School of Physical Science and Engineering and the Department of Electrical Engineering both keep the subject registration forms. In three of the twelve comparisons

correspondence or other information is duplicated. In general the files for undergraduates did not contain a wide variety of information.

- The comparisons of postgraduate student files indicate that a substantial amount of duplicate information exists between the two records. As with the undergraduates, copies of the enrolment form were kept by both School Office and department. Additionally, in all cases the School Office and department kept either the postgraduate offer or reply form. Many other documents were duplicated, although their retention is not consistent. These include information like transcripts, position offer letters, applications, and letters of recommendation among others. In general, the files for postgraduates contained a large amount of information much of which was duplicated.

4.6 Comparison of undergraduate and postgraduate student files

- A further comparison of the documentation held in undergraduate and postgraduate files was undertaken to see just how much material is being filed. The findings (see table below) confirm the statements of the schools and departments that postgraduate files contain more information than undergraduate, partly because the SIA system does not have sufficient fields for recording data on postgraduate students.
- Student files comparison table – KCL Schools: undergraduate and postgraduate files** (random samples examined in ACRS)

Undergraduate file	Postgraduate file
School of Engineering	School of Law
B Eng 1999	Postgraduate file 1995
<ul style="list-style-type: none"> UCAS clearing entry form 	<ul style="list-style-type: none"> Application for admission as Postgraduate
<ul style="list-style-type: none"> Enrolment form 	<ul style="list-style-type: none"> PG reference form
<ul style="list-style-type: none"> Subject registration form 	<ul style="list-style-type: none"> References supporting application
<ul style="list-style-type: none"> Safety declaration 	<ul style="list-style-type: none"> English test form
<ul style="list-style-type: none"> Change of course form 	<ul style="list-style-type: none"> Copies of scholarship offer from British Council
<ul style="list-style-type: none"> Examination confirmation form 	<ul style="list-style-type: none"> Letter offering place
<ul style="list-style-type: none"> Medical certificate for non-attendance at exam 	<ul style="list-style-type: none"> Letter and form of acceptance
<ul style="list-style-type: none"> Application to do Masters 	<ul style="list-style-type: none"> Enrolment form with photo
<ul style="list-style-type: none"> C.v. 	<ul style="list-style-type: none"> LLM subject selection form
<ul style="list-style-type: none"> Postgraduate reference form 	<ul style="list-style-type: none"> Courses list
<ul style="list-style-type: none"> References 	<ul style="list-style-type: none"> Final report form
<ul style="list-style-type: none"> Project objectives form 	<ul style="list-style-type: none"> Examination results
<ul style="list-style-type: none"> Transcript of results 	
<ul style="list-style-type: none"> Copy of pass list with names and result highlighted 	
School of Nursing	School of Nursing
PR (practice nurse?) 2001	Postgraduate nursing file 1999
<ul style="list-style-type: none"> Permit to enrol with photo [and tick to show that details entered on SIA] 	<ul style="list-style-type: none"> Application form
<ul style="list-style-type: none"> Practice nurse study funding application 	<ul style="list-style-type: none"> Selection documentation
<ul style="list-style-type: none"> CPD funding form 	<ul style="list-style-type: none"> Letters offering place
<ul style="list-style-type: none"> Equal opportunities form 	<ul style="list-style-type: none"> Letter re interview

	• Permit to enrol with photo
	• Courses list
	• Assessment record sheet
	• Council tax certificate
	• Academic progress for CFP
	• Change of address form
	• Absences note
	• Correspondence with tutor
	• Honorary contract (diploma)
	• Occupational Health fitness certificate
	• Assessment disclaimer (plagiarism)
	• Index of fees received
	• Equal opportunities monitoring form
	• Declaration of good character
	• English Nation Board Basic Nursing training record
	• Reference request
	• Marks/result
	• In a separate sleeve within file:
	- summary sheet with name, d.o.b., address, tutor's name, educational qualifications
	- summary of progress
	- practice placements
	- sickness/absence record
School of Humanities	School of Humanities
Geography Department BA 1991	Postgraduate War Studies 1995
• UCCA application form	• Application form
• Enrolment form	• Enrolment form
• Correspondence re application	• Correspondence re acceptance of offer
• Photo	• Confirmation to Dept of offer
• Course unit registration form	• Letter of offer
• Correspondence with tutor	• Postgraduate reply form (EC and OS students)
• Course progress record	• Statement of qualification for PG
• Examination	• Change of address
• Complete examination results	• Student report form
	• Official transcript of results

3. There is a further complication where students undertake combined studies or a junior year abroad. In both cases unique and duplicate documentation is being kept on the student in more than one location, with no policy on where essential material should be filed on completion of the course.
4. Documentation which should not be on the student file (e.g. medical certificates, fees records) does sometimes find its way onto the file.
5. It was noted that in both the undergraduate and postgraduate student files for School Office and department there is duplication of information and, at times, some

documentation which should not be there. This appears to be more evident in the postgraduate files, which in general also contain more documentation than the undergraduate records. There is, unfortunately, no clear pattern as to which office (school or department) contains the greater quantity of unique information on its student file.

4.7 Records maintained by academic/personal tutors/clinical advisers

1. Most schools advised that academic staff were not comfortable using the student database to access information, and either asked administrative staff to do the checking for them, accessed the paper files or created their own files.
2. One school advised its academic staff not to hold information on students, but to either destroy it or, if it was seen to be important, to place it on the School Office file. Possibly as a response to this requirement, some student files (in more than one School Office) included sealed envelopes containing confidential personal information, placed on file by, for example, personal tutors.
3. Most schools advised that they believed academic staff were holding documentation on their students, but that this was not viewed as an “official” record, but the personal property of the academic staff. There were no official procedures in place requiring academic staff to destroy such material once the student completed.
4. Clinical advisers in one school have been issued guidelines which state that any records of meetings with students must be confidential, kept securely and not created without the student’s permission.

4.8 Records held for other purposes by school staff

Staff in the schools and departments may hold other information, in differing capacities (e.g. as Disability Advisers or Business Development Managers), on named students. A discussion with one such Adviser revealed that personal information was either destroyed when appropriate or passed to another authorised person (e.g. counsellor, occupational health professional, personal tutor).

4.9 Duplication of information

1. The identified duplication of records could expose the College to the risk of not complying with the principles of the Data Protection Act 1998, which state that personal data shall be:
 - Obtained and processed fairly and lawfully, and shall not be processed unless specific statutory conditions are met.
 - Obtained only for one or more specified and lawful purposes, and not be further processed in any manner incompatible with those purposes.
 - Accurate and, where necessary, kept up to date.
 - Held no longer than is necessary for the purposes for which they were obtained.
 - Processed in accordance with the rights of Data Subjects, including the general rights to access information held about them and where appropriate to correct or erase it.
 - Kept securely and safely, with appropriate measures to prevent unauthorised or unlawful processing of the data.
2. In practice, a risk of non-compliance is created by:
 - The existence of local databases from which information is not being deleted as part of a structured procedure to remove redundant data.
 - Large amounts of duplicate information being retained in multiple locations.

- Overlapping paper files in the Schools (School Office, Academic Department, Academic tutor), with consequent duplication of information.
 - Information created for specified purposes (e.g. disciplinary cases), in files held by the central administrative departments, some of which may also find its way to the academic school/department record causes further problems.
3. Multiple file creation raises further questions about efficient use of physical space and the cost of storing duplicate material.
 4. Storage of multiple files in ACRS is a waste of the high cost temperature and humidity controlled storage facility, which is needed for long-term records of permanent value, and causes duplication of effort when files are requested by staff or researchers. Multiple microfilming of records containing the same information is a waste of time and money.

5. IDENTIFYING THE CORE RECORD

5.1 What does the “core record” mean?

1. The “core” student record means different things at different times and to different people and agencies. What is very valuable information to QAA may be irrelevant to the Student Loans Company and vice versa. What the student sees as vital may not be what the academic tutor values. Decisions concerning retention of the core record must also take into account the concept of the “progress file” and lifelong learning as outlined by QAA, Universities UK and JISC.
2. There are several aspects to the “core record”:
 - For how long is a piece of information part of the “core record”?
 - Is the “core record” needed for:
 - Efficiency of internal administration?
 - The statistical and/or quality monitoring of external bodies on which the College relies for funding or validation, including provision of a “progress record”?
 - A safeguard against potential litigation?
 - The expectation of the student for long-term availability of information (e.g. for references, replacement of lost transcripts)?
 - Long-term research value?
 - All of the above?

5.2 The core record for internal administration

It could be said that the core record should comprise only that data which KCL needs to fulfil its obligations to the student over time; all other data could be deleted/destroyed when appropriate. The earlier work of the student record working party in clarifying this core data found that the essential record comprises:

- Student name and identifier
- Date of birth
- Address at initial commencement and completion/termination
- Educational background
- Course and dates
- Performance/assessment
- Name, date and result of award

5.3 The core record for external requirements

1. Monitoring, audit and statistical requirements of HE bodies: the following data must be collected and maintained for set periods of time by the College to satisfy these requirements:

- Annual headcount
- Student profile information
- Applications data
- Summaries of final degree results
- Progression, wastage and submission rates

Essential data for preparation of these reports and statistics, according to those offices which must prepare them, includes:

- school results
- school attended
- application dates
- clearing
- parents’ occupation
- start dates
- course

- transfers
 - result
 - attendance
 - fee status
 - date of birth
 - gender
 - ethnicity
 - disability
 - funding
 - first destination
 - new fields to be included for widening participation: sexual orientation, religion.
2. Professional bodies such as the General Dental Council and the General Medical Council require more detailed information concerning a student's progression and marks than is currently available on the student database. Similarly, foreign employers may request very detailed accounts of job applicants' course curricula, field placements and achievements.
 - To deal with this expectation, two schools at King's have created a student log which could also be seen as an early attempt at a progress file. The log contains an expanded transcript containing details of courses undertaken, and is being created to satisfy the requirements of professional bodies for greater detail than is currently on the student file (whether in hard copy or electronic). It will be the property of the student and s/he will be expected to keep it up to date. The log is presently in hard copy only.
 - Long-term use of the log, however, converges after graduation. One school expects the student to take the log, on the understanding that it is his or her responsibility to maintain and update his/her own lifelong learning record; the school does not keep a copy. The other school, however, views the log as a progress file for the term of the student's life at King's only, and retains it in the school once the student has completed.
 3. The progress file/lifelong learning record:
 - There is an increasing expectation that there should be a one-stop shop for all information on a student which s/he can access throughout his/her working life via a database/student portal.
 - King's Academic Registry is currently working towards creation of such a student portal, to be initially used by staff and the student during his/her time at King's. Creation of the student portal could be the first step towards creation of an official progress file/PDP/lifelong learning record. Confidentiality concerns at present preclude some information being included on the database/portal e.g. disability information, counselling records, hardship records, disciplinary. There is potential for either a link to the paper record or clarification/tightening of security measures.

5.4 The core record for legal requirements

1. Requests have been made by School Offices to ACRS for the hard copy student file for proof of signatures.
2. Appeals, complaints and claims:
 - College Regulations stipulate that appeals against misconduct or failure shall be heard within fourteen days of receipt of a decision (s.3.10.2 & 4.4.1) and that the internal appeals process will be final (s. 3.10.9.4).
 - Records relating to disciplinary matters, complaints or claims may, however, need to be kept for longer periods to deal with claims which may be taken out by, or against, students for breach of contract (the Registration Form signed by the student, together with the Regulations in force at time of signing and certain other documents, form a contractual relationship between KCL and the student, as do

lettings agreements for student accommodation). The provisions of the Limitation Act 1980 apply a time limit to actions for breach of contract and actions to recover rent (relevant records should therefore be retained for the following periods: the date on which the contractual relationship or a related dispute comes to an end + 6 years, or in the case of rent arrears: the date on which the rent arrears became due + 6 years).

- One university was publicly chastised by the Information Commissioner this year over destruction of a student complaints file before all the avenues for complaint were exhausted (i.e. in the 7th year after the case is closed). The Commissioner ruled that the university’s policy breached the legally enshrined principles of “fairness and adequacy” (*Times Higher Education Supplement*, 3/7/03).
3. King’s Records Disposition Schedule [see **Appendix IV: King’s Records Disposition Schedule** for relevant sections] already has procedures in place for retention, and subsequent disposal, of those aspects of the student record which must be retained for a period of time under specified legislation. It is imperative that these procedures are disseminated and enforced.

5.5 Student expectation that information will be retained

1. There is an expectation on the part of researchers and students that records relating to the post-graduation activities of alumni (e.g. copies of references, details of post-university employment) will be held and made available [Note: at King’s the Alumni Office keeps no such records, but rather records of addresses, functions attended and donations made. The Careers Service maintains the King’s Connections database of alumni who have agreed to act as advisers, which may include occupations. Copies of references often turn up on the paper files].
2. The findings at King’s have been as follows:
 - Ex-students frequently ask the School Offices for confirmation of, for example, length of study, results, transcripts as long as 50 years after graduation.
 - Students have been known to ask tutors for references up to 20 years after graduation.
 - Students routinely ask the departments for examination confirmation.
3. References and the student record: a justification frequently given for full retention of the student record is that there is a flow of requests for references, confirmations etc from former students, based on the argument that the College ought to be of service to former students where it can. Records may, however, become increasingly inadequate over time for use as a basis for personal recommendations; retention of the student record *in its entirety* for this reason alone is probably not a sufficient justification.
4. For the student, therefore, the “core” record is the record which s/he needs to retain throughout his/her working life as proof of his/her progression and qualifications, The “core” record, therefore, for both lifelong learning and to fulfil the expectation that essential data will be retained is:
 - the progress file, which comprises;
 - the transcript;
 - the personal development plan, though it is at this stage not possible to tell whether retention of the PDP will become a requirement.
 - Core data which the transcript (as part of the progress file) should contain, according to Universities UK (and others) *Guidelines for HE Progress Files*, (para 25) comprises:

Student	Name
	Date of birth
	Institutional reference number
	HESA reference number
Qualification	Name of qualification

	Level of qualification
	Name of awarding institution
	Name of institution responsible for delivering the programme
	Language/s of instruction and assessment (to meet EC requirements)
	Professional body accreditation
	Statutory regulatory body recognition/ approval
Record of learning and achievement	Name of programme
	Module or unit study code and title
	Number and level of credits awarded for each module/unit completed
	Date (year) in which credit awarded
	Mark or grade for each module/unit studied
	Number of attempts to complete each module/unit
Other types of learning within the context of a programme	Study abroad
	Work placement
	Work experience
	Accredited prior certificated and experiential learning
	Accredited key skills
Award	Overall credits achieved
	Overall mark/grade
	Overall classification or performance indicator
	Professional/statutory body recognition
	Date of award
Authentication	Date of issue
	Signature/seal
	Telephone number for verifying information
Explanatory information	Guidance on how to interpret the transcript
	Information on the grading scheme
	Overview of the National Qualification Awards Framework
	Overview of the UK HE system

5. 6 Long-term reference/research value

- Section 33 of the Data Protection Act 1998 grants an exemption to the instruction against further processing and/or retention of personal data as follows:
 - For the purposes of the second data protection principle, the further processing of personal data only for research purposes in compliance with the relevant conditions is not to be regarded as incompatible with the purposes for which they were obtained.
 - Personal data which are processed only for research purposes in compliance with the relevant conditions may, notwithstanding the fifth data protection principle, be kept indefinitely.
- The following data within student files has been routinely requested by users of ACRS in the past (note: no distinction has to date been made between staff requests for files on living students and research use of historical records; i.e. no statistics have been kept on the purpose for which the information was required):
 - Dates

- First and final addresses
 - Photographs
 - Parents' address
 - Qualifications: A levels; last school attended
 - Transcript
 - Prizes/distinctions
 - Special access schemes
 - First destination employment
 - Criminal record (police, MI6 e.g. checks on trainee teachers, some science applicants) or fitness to practice checks (medical students).
 - Medical students: hours and other details of clinical placements
 - Hours undertaken (may be needed for pension purposes in some EU countries for medical and non-medical students).
 - Leisure activities, references (usually genealogical).
3. There is already a consensus at King's, reinforced by the findings of the student records working party, that the "core" student record will be retained permanently a primary source material for information and research into the history of the College and of society generally. The student file forms a unique and indispensable record for researchers such as historians, scientists, geographers, sociologists, statisticians, architects, writers, genealogists, local historians, biographers, broadcasters and journalists. While it could be argued that the statistical information on students produced for external agencies like HEFCE and HESA should be sufficient for most purposes, the changing nature of research trends means that it is impossible to predict all the potential uses for the student file.
4. Current trends indicate that the "core" record for research use is:
- Name
 - Date of birth
 - Ethnicity
 - Nationality
 - Sex
 - Start and completion dates
 - First and final addresses
 - Photographs
 - Parents' address and occupations
 - A level results; schools attended
 - Prizes/distinctions
 - Special access schemes
 - First destination employment
 - Criminal record
 - Fitness to practice
 - Leisure activities, clubs and societies
 - [Potentially] religion and sexual orientation
 - Transcript

6. RECOMMENDATIONS

6.1 The core record

It is recommended that the core student record for *permanent retention* is documentation providing essential data as follows:

- Data obtained from the approved application: name/s, first address, date of birth, parents' details, photograph, academic details, sex, ethnicity, disability, nationality, criminal convictions, funding status, course applied for.
- Data relating to the progression record: change of course, prizes, serious disciplinary or misconduct information (summary only), special or mitigating circumstances information (summary only), any extra information required by professional/accrediting bodies about performance, address at programme completion/termination of study, copies of references or c.v.s, first destinations. Most of these details should in future be included on either the full transcript or the personal development plan.
- Data included on a full transcript (which may include progression details) i.e. data obtained relating to the award: year of completion, name of award, result of award, result of modules/course units used to calculate the result of the award.

6.2 Non-core data which should be destroyed once administrative reference need or the legal requirement for retention has passed

Information which should be deleted/destroyed in the 7th year comprises:

- Mitigating circumstances forms (though a summary of special circumstances leading e.g. to failure, poor performance should be kept).
- Disciplinary records (though a note of major incidents should be retained and some major cases should be kept for historical purposes).
- Fee/debtors details.
- Hardship Fund details.
- Accommodation details
- Routine correspondence

Not all records under these headings must be retained for up to 7 years; where authorised by the Records Disposition Schedule earlier destruction/deletion should be carried out if at all possible.

6.3 Deletion of electronic data

1. Deletion of information regularly once administrative reference ceases from all databases other than the student database, the Raisers Edge database maintained by the Alumni Office or the ROSA system maintained by the School of Nursing is essential to comply with the Data Protection Act and to honour the obligation to students that no unnecessary information on them will be held. All on-site databases (such as excel spreadsheets or access databases), if they must be created, should be for quick short-term reference only.
2. All e-mail lists of students and correspondence by e-mail should be deleted as soon as reference ceases. If the correspondence comprises core information which cannot be entered onto the student database then a paper copy should be placed on file.
3. Data in the student database, Raisers Edge and ROSA databases should be deleted in accordance with the same recommendations as those which apply to the destruction of the paper record.

6.4 Destruction of paper documentation

1. Non-core material should be destroyed in the 7th year after file closure/completion of the student's contract with King's to cover contractual requirements or legal challenges, to comply with the Data Protection Act 1998 and/or because of insufficient justification for retention.
2. Although some material could probably be destroyed/deleted earlier, it may not be practical in terms of resource allocation to undertake more than one weeding/deletion process for paper files.
3. It is therefore essential that documentation which should *not* be kept on the student file and which should be destroyed earlier (such as confidential personal data or examiners' notes) *is not* placed on the paper file. The student has the right to see his/her file; documents which are retained longer than they should be will therefore have to be released to the student. It is a criminal offence to destroy a document (even where it has been retained in error) after the data subject has asked to see it.
4. Examination scripts, examiners' notes and submitted course work should not form part of the student record; scripts and notes may be destroyed 3 years after completion of course. Course work may be the property of the student and should either be returned or destroyed after the course is completed.
5. See **Appendix III: Lifecycle of the student record** for detailed disposal recommendations.

6.5 Preservation of core data

The student database

1. Improved formatting of core legacy data should be investigated to ensure that all essential information in electronic format is fully accessible.
2. The Academic Registry should continue its investigations into ways of simplifying and standardising data entry into the student database and archiving the core record.
3. ACRS and the Academic Registry should continue their investigation into digital preservation of the core record within the student database by an examination of digital repositories such as the facility at ULCC.
4. Unless and until such permanent digital preservation is effected, the core paper record should continue to be transferred to ACRS for permanent retention. ACRS should continue to investigate the cost benefits of microfilming student paper files to save space.

The paper file: schools and departments

1. It will be necessary to identify which file, or which documents on which file, comprise the core record. At present School Offices and departments create *semi-parallel* files, which contain some duplicate and some unique information. It is impossible to make a blanket demand that *either* the School Office *or* the Departmental file be kept because of inconsistency of structures of the schools and extreme variation of practice (in some cases the departmental file has extra core information, in some cases the School Office does).
2. It is essential that, to avoid duplication and excess storage costs, all the core information on a student should be merged into one file before transfer to ACRS. Non-core information also needs to be weeded out and destroyed.
3. Given that departments may be moved from school to school (the Geography Department, for example, has moved from the School of Humanities to the School of Social Science and Public Policy), it may be appropriate in all circumstances to advise that the departmental, not the School Office file, be the permanent record.
4. It may be appropriate to place copies of transcripts on the paper file, as some schools are already doing, for ease of reference.
5. It is essential that sensitive personal information is destroyed when it should be e.g. copies of personal information sent to tutors or Examination Boards by the Student

Counselling and Welfare Service *must* be destroyed when so required under the Service's Code of Practice; this principle applies to *any* sensitive personal data which is passed to third parties.

6. It is recommended that schools make a clear policy decision that documentation which should *not* be kept on the student file is filed separately.
7. Records created/maintained by academic staff: such records should always duplicate information in either the school office or the departmental file, other than some personal comments by the tutor etc, which should in any case be destroyed. The recommendation is, therefore, as follows:
 - These records do not constitute an officially designated corporate record and are the personal property – and therefore the personal responsibility - of the academic, not of KCL.
 - It is the academic's responsibility to ensure that any unique information which they consider *should* be retained as part of the corporate record is passed to either the School Office or departmental file, depending on the policy of the individual school.
8. Each school, therefore, needs to decide which file, and which documents on file, constitute the "official" record, using the guidelines above, and enforce that decision by amalgamation and destruction of duplicate material.
9. Any documentation which *should not* be on file should be removed at this point and disposed of either by destruction or by retention in the School Office pending the approved destruction date. See **Appendix III: Lifecycle of the student record** for disposal recommendations.
10. All files, once processed, should be transferred to ACRS for permanent retention.
11. ACRS will undertake the task of weeding and consolidating files already in its custody once it is advised by individual Schools of the appropriate policy.
12. ACRS will continue to investigate the cost benefit of using an external company to create a user-friendly database from microfilmed student files for ease of staff access and eventual research use.
13. It is accepted that lack of resources is a major stumbling block to the above functions; it should, however, be accepted that the long-term cost of storing duplicate material is greater than the one-off cost in staff time to streamline records creation and maintenance.

The paper file: central administration

1. The Records Disposition Schedule already gives clear guidance on disposal of some paper records relating to students created by the administrative departments e.g. pass lists, transcripts.
2. Some paper files are created under conditions of absolute confidentiality (e.g. welfare and counselling records) and are destroyed accordingly (but see above for the absolute requirement that any copies are also destroyed). Disciplinary case files should equally be destroyed, other than samples destined for ACRS.
3. Where some central offices take on the role of School Office (as is the case with KILT and the Student Recruitment and Exchanges Department for Junior Year Abroad students), the same procedures should apply as for School Offices.
4. In all other cases information should be destroyed in accordance with the existing procedures outlined in the Records Disposition Schedule or under new guidelines suggested in **Appendix III**.

6.6 Long-term formats: summary of recommendations

1. The student database:
 - The College as a whole should aim for standardised electronic creation and retention of core data in one central location.
 - Annual snapshots of the student database should begin as soon as practicable.

- Use of a digital repository for permanent storage of core information from the student database once it is closed (e.g. if a new system is purchased), should continue to be investigated.
2. Paper files: schools
- Amalgamation of files according to procedures approved by each school should begin as soon as possible.
 - Weeding of files in the 7th year after closure should be written into the procedures.
 - The current investigation by ACRS into microfilming the student file and creation of scanned copy to improve access, should continue.

7. CONCLUSION

7.1 The project's benefits for King's College

Within the College the project has without doubt raised awareness of the difficulties inherent in a devolved structure with its concomitant autonomy of action as follows:

1. The duplication of effort and information across the College and within schools;
2. The need to ensure that the terms of the Data Protection Act are properly implemented;
3. An awareness that there is no cheap or quick fix solution to either short-term storage problems or long-term retention of the "core" student record.
4. The requirement for continuity and community of practice, compatible with the current devolved structure, throughout King's in the creation, maintenance, processing and disposal of the various parts of the student record.

7.2 The project's benefits for HEIs and the JISC

The project has demonstrated the following:

1. The need for clarification of requirements across a number of disciplines.
2. The need for a consistent approach to dealing with different media.
3. Confirmation that there is no single/definitive "student file" and that disposal is, inevitably, a matter of local interpretation within the constraints of the law.