

Student Records Management Review

Issued by
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1. Introduction/background to Review

During an internal Audit of Quality Standards and Academic Validation of Taught Programmes in September 2011 Mazars looked at Student Records Management processes within CEMPS and made the following recommendation with reference to student records:

“The University should review the records management systems and policies in the other colleges, and centrally, to ensure that these are adequate”

In accordance with the management response to this recommendation the University Records Manager was asked by Academic Policy and Standards to carry out this review, it was agreed due to limited resources that the review should focus on Colleges and Registry Services. Meetings were held with each of the Colleges and with Registry Services to review current student records management practices. Student records held within SITS were outside of the scope of the review. This report summarises the findings and makes recommendations which will help improve Records Management processes and support the timely access to records. The recommendations aim to reduce the risk of reputational damage and possible financial penalties caused by the loss of records and breaches of Data Protection legislation.

2. Student Records Management Practices

2.1. General Policy and Processes

The University has a range of guidance and advice in place which is available via the University website¹. This is used to answer specific questions but not followed consistently. There are several areas where the guidance could be improved in particular by making the recommended retention schedules easier to implement.

There were some department/College level process notes which covered some Records Management issues but formal Student Records Management Policies did not exist. This was identified as a risk where there was reliance on an individual's experience and knowledge, or access to information stored on personal drives.

CEMPS were in the process of producing a College specific retention schedule and other records management documentation in response to the Mazars' internal audit. As with any documentation the time and resource required to write and maintain formal policies and processes was seen as a significant problem. However, it is not for each College and department to produce separate policy documentation; the University guidance should be suitable for adoption by all departments. Where a department wishes to develop additional guidance this should be done in a similar manner to CEMPS where the University guidance is used as a basis for developing specific policies.

2.2. Paper Records

The majority of Colleges/departments rely on paper based systems for core student files. A paper file is normally created for each student at the start of their first year and will be added to throughout their studies. These files store information on programme changes, interruptions, key correspondence etc.

¹ Records Management Guidance: <http://www.exeter.ac.uk/recordsmanagement/records/guidance/>
TQA Manual: <http://as.exeter.ac.uk/support/admin/staff/qualityassuranceandmonitoring/tqamannual/>

Where these documents were originally electronic (e.g. email) they tend to be printed and added to the student file if deemed important, a decision which is made on a case by case basis.

Files for current students are normally held in the College Student Services Office (or similar) where they are readily accessible for operational needs. Once a year when a cohort graduates their files will be moved out of the office and into 'archive' storage. 'Archive' storage tends to be locked cupboards, rooms, stores on campus but not always within the same building. The storage is not custom built and is not always ideal for the storage of paper records.

2.3. Electronic Records

Registry Services and CSSIS were the only departments who were attempting fully electronic systems. Registry Services use WinDip Enterprise to scan and store images of paper records. Once scanned paper records are destroyed. CSSIS is attempting to move away from paper records through the use of shared email accounts to store student records; paper records are scanned and saved within the email system along with existing emails.

All areas rely on some electronic records which fall into three broad categories:

i. Database records e.g. SITS

SITS has not been examined in this review.

ii. Emails

As mentioned above emails of significant value tend to be printed and added to a hard copy student file. Copies of these and other emails not added to the student file remain in the email account. There were no formal processes for applying retention schedules to these emails.

Generally departments are using shared email accounts, however, there were several examples where individuals used their own email accounts/server space. This was felt more personal for the student and generally no-one else would need to access these records, however there is a risk of not being able to access important documentation during staff absence or colleagues not realising that important correspondence exists.

iii. Shared Drives

Shared drives were normally used to store information that relates to multiple students and cannot be added to individual student files including exam board minutes, lists of students etc. The access to these shared drives requires regular monitoring.

There was no systematic review and destruction of these electronic records, mainly due to being 'out of sight' and therefore 'out of mind' electronic records were not a high priority for review and deletion.

3. Areas of Review

The Terms of Reference of the review (see Annex 1) outlined seven objectives summarising the purpose of the review. The key findings and recommendations for each of the terms of reference are outlined below.

3.1. To examine existing policy and practice with regard to student records throughout the record lifecycle

There was a good awareness of University Records Management Guidance.

Although some areas held process notes and documentation that covered some Records Management areas there were no college level Records Management policies. CEMPS were the closest as part of their review into student records management college level retention schedule and other documentation is being developed.

- *Recommendation (1): Develop standard template of policy statements for the management of student records, to be used as a benchmark for developing good practice. Departments that wish to develop their own policies and practices should base them on a standard template to reduce duplication and ensure consistent, compliant practices across the University.*

3.2. To ensure awareness of and compliance with the University's recommended retention schedule for student records

The University's recommended retention schedule² recommends retention periods for a range of records including student records. The schedule was generally used as a reference guide. Colleges were moving towards the destruction of records in line with the recommendations; however in some disciplines records were held which were well past the recommended retention. This was either due to a lack of resource to review records or a desire to retain 'historical' records.

Several colleagues commented that it was difficult to follow the retention schedule fully due to the granular nature of the record types with each having a different retention period; it was more practical and efficient to destroy full files rather than regularly weed out records.

The retention schedule has often been used as a tool to determine what records could be destroyed when moving office or running out of space. In the move to Colleges many old records had been destroyed in line with the schedule and going forward Colleges were establishing annual processes to ensure the regular disposal of records.

CEMPS has decided to develop their own retention schedule based on the University schedule, which will be amended to reflect College practices, terminology and revised retention periods for certain record types.

- *Recommendation (2): Review the University Recommended Retention Schedule to ensure it is clear, concise and practical.*
- *Recommendation (3): Ensure the University Recommended Retention Schedule is followed, where records are past the recommended retention they should be reviewed for destruction. In cases where a longer retention period is required (e.g. for accreditation purposes) the reasons for this should be recorded and agreed with the University Records Manager.*

3.3. To review processes for tracking the location and access to student records

3.3.1. Tracking

The review looked at two aspects of the tracking of student records. Firstly the processes in place for tracking individual files that may be removed from filing systems. Generally there were minimal processes in place for tracking these paper files. In some areas a basic sign out slip was used, or a process of informing one of the members of staff who would keep note of who had the file. This was not thought to be a significant concern and access to records was provided by office staff who would then be aware of who had retrieved the record. However, this does not provide an audit trail or help when a file is missing.

- *Recommendation (4): As a minimum a sign in/out process is implemented for individual student (hardcopy) files to ensure that there is a full audit trail. A suggested template should be developed centrally and provided to Colleges for adaption and adoption. Following their meeting Registry have already implemented a simple sign in/out process for access to microfiche records.*

In addition the tracking of the location of batches of records was discussed. In most cases colleagues could specify where particular records were stored in some cases there was uncertainty as to where historical records were stored following the move to Colleges. There were no documented listings of where records were stored, when records were transferred from active use in offices to various archive/storage facilities or when they had been destroyed.

- *Recommendation (5): A simple listing of record locations is developed to include record description, location, and destruction date. A template will be developed centrally. This is vital to*

² http://www.exeter.ac.uk/media/level1/academicsserviceswebsite/it/recordsmanagementservice/All_approved_schedules.xls

ensure that the University knows where student records actually are and that this is recorded rather than relying on individual's memory/knowledge.

3.3.2. Access to Student Records

The review looked at the access to student records to ensure that the records were accessible to staff who had a valid access requirement but not too widely accessible.

i. Paper Records

Access to paper records was monitored by staff working in the office who would assess whether there was a legitimate need for another member of staff to access the records. The tracking process described above will help ensure that access to paper records is consistently monitored and reduce the risk of loss of records.

ii. Shared Drives

It is common practice to store student information on shared drives. This may include correspondence, tracking spreadsheets, minutes containing student personal data etc. The access to shared drives is managed within Colleges/Services. Most Colleges thought there were processes in place to monitor who has access to shared drives; however it is important to ensure this is the case. Registry Services carried out a quick review of access to shared drives and WinDIP and identified 30 members of staff who had moved department or left and no longer required access.

- *Recommendation (6): A brief review should be carried out to ensure that student personal data saved on shared drives is only accessible by those members of staff who require access. A process for keeping access up to date and an annual review is also required.*

iii. Email

Email as a method for storing records was used most extensively by CSSIS. The CSSIS College office was using two shared email accounts to store all student records. CSSIS was the only College to have fully moved away from hard copy student records in this way.

- *Recommendation (7): Email accounts are not Records Management systems and their use as such may have long term implications for the management of records. In the absence of a simple, easy to implement alternative and with limited resources email provides a simple solution. It is recommended that email management systems such as Oasys are reviewed and if deemed suitable provided to enable a more structured use of email as a records management system.*

Where CSSIS retained every email in the students email folder other Colleges made a judgment as to which emails were considered important and should be printed and added to the paper file. Other emails were retained within the unstructured email system.

Across the board there was little consistency with regard to the deletion of emails with records being deleted from time to time, when the account was reaching capacity or rarely.

- *Recommendation (8): Ensure that Retention Schedules are applied equally to email and electronic records as well as paper records.*

iv. Personal Drives/Email Accounts

There were several instances where personal drives and email accounts were used to store student information and records. This is a risk to the University in the case where a member of staff is off ill or leaves suddenly access to the information may be lost. Student records and correspondence should be considered as University records and should be accessible by more than one member of staff. For highly sensitive records (e.g. disciplinaries) access to shared drives can be restricted and secure folders used where records are highly confidential.

- *Recommendation (9): The use of shared drives and email accounts should be recommended wherever possible.*

In addition to access to records by staff, departments often receive legitimate requests for information from third parties. There was good knowledge about the Data Protection Act and what information should be disclosed e.g. external examiners normally had access to anonymised copies of work, information would not be disclosed to parents. There were concerns raised by one College about the sharing of information within the University and whilst it was acceptable and right to share some information on a need to know basis they noted that from time to time they would receive information from Finance which they did not feel they needed to know.

- *Recommendation (10): Regular reminders to be circulated by the Records Manager regarding the sharing of personal information.*

3.4. Assess storage and security issues surrounding student records

Generally current student records are stored in Student Services Offices (or similar) which are securely locked when not attended.

Neither current nor archived records were stored in fire proof storage, in the Business School rolling shelving used to store records was thought to be fire proof however on inspection the shelves were open thus fire proofing would be lost.

Mazars advised that fire-proof storage should be considered. In considering this the impact of losing records to fire/flood must be considered, it is true that loss of any paper student records would be severely disruptive, but increasingly student records are electronic and core student records (contact details, results, progression etc) are stored on SITS mitigating the impact of loss of hard copy records. Fireproof cabinets normally offer 1-4 hours protection from fire (they also by default offer some protection from flood) but do not eliminate the risk.

- *Recommendation (11): Preference should be given to digitizing records rather than increasing storage of paper records. When digitization is not possible consideration should be given to purchasing cabinets and units that are fire-proof.*

3.5. To review compliance of student records processes with relevant legislation e.g. Data Protection Act and other records management best practice

Data Protection/Records Management training is not compulsory within any of the Colleges. Registry staff and key staff in Colleges have attended the training sessions provided by the University and Data Protection is covered by the induction process ensuring that all staff are made aware of the basics.

There is generally a good basic understanding of the implications of Data Protection demonstrated by the restrictions on disclosing information to third parties. Colleagues confirmed that they would contact the University Records Manager should a situation arise that they were unsure about.

All Colleges/departments were clear that they would not disclose personal information to third parties and were aware of the confidentiality needs around student records.

- *Recommendation (12): Following a request by several Colleges refresher courses in Data Protection/Records Management should be provided.*
- *Recommendation (13): Consideration should be given to making Data Protection Training compulsory for ALL members of staff either through face to face training or via online training. In the meantime new members of staff should be strongly encouraged to attend Data Protection training.*

When the University receives a subject access request in accordance with the Data Protection Act the applicant is entitled to a copy of all the personal information held about him/her. Discussions with the Colleges revealed that whilst it was straight forward to obtain copies of the core student file there was a concern that some email correspondence may not be located in the standard search. In particular there were no set processes for adding Academics' correspondence to students file. When in receipt of a SAR attempts were made to obtain these records but there was uncertainty over the records management processes.

- *Recommendation (14): Further consideration is required on how to solve this issue, in the meantime clear guidance will be provided to departments on what information should be supplied in response to a Subject Access Request.*

3.6. To share good practice among departments

The recommendations outlined in this report promote good practice in the management of student records. In addition there were many examples of good practice identified across the Colleges and Registry Services. In particular the following were identified:

- Use of university guidance
- CEMPS review of Records Management processes and their development of a tracking spreadsheet for student records
- Good awareness of Data Protection issues
- Business School purpose built, lockable rolling shelving for archive records.
- CHUMS have reviewed their archiving processes and will annually review the access list for the student record files now on their shared drive, to ensure this takes place reminders are set using the College Office outlook calendar.

3.7. To make recommendations for improved student records management and further action.

A full list of recommendations is provided in Annex B.

4. Next steps

Annex C provides a checklist for Colleges/Departments to work through to ensure that the recommendations in this report are implemented. All Colleges will be able to tick off some of the items immediately without need for any action. Wherever possible templates, advice and guidance will be produced centrally to minimize the work required by Colleges/Departments. Items marked with an asterisk (*) require guidance/templates to be developed centrally before Colleges/Departments embark on any actions.

The checklist will be circulated to Colleges and the templates/guidance developed centrally as soon as possible. Once all guidance is available Colleges/Registry will be asked to confirm completion of the checklist within 6-12 months.

5. Suggested further work

There are two obvious areas for further review, the first being a larger number of departments. The scope of this review was limited to Colleges and Registry Services and in the main focused on core student files, it did not review student records/information held elsewhere (for example Student information desk, Finance, Admissions, Wellbeing Services, International Office etc.).

The second area for further work would be to extend the review to look at other record types (for example staff records, finance records, committee records, research records) where it is likely that issues around use of email, paper vs. electronic and retentions will be similar. A series of Retention Schedules for various record types is being developed by the records manager to cover further records types.

6. Annex A – Terms of References and Process for the Review of Student Records Management

Terms of Reference

1. to examine existing policy and practice with regard to student records throughout the record lifecycle
2. to ensure awareness of and compliance with the University's recommended retention schedule for student records
3. to review processes for tracking the location and access to student records
4. assess storage and security issues surrounding the storage of student records
5. to review compliance of student records processes with relevant legislation e.g. Data Protection Act and other records management best practice
6. to share good practice among departments
7. To make recommendations for improved student records management and further action.

Process of Review

The review will take the form of one-to-one meetings with a representative from each department to discuss the Records Management processes and systems in place. An agenda/list of discussion points will be provided in advance of the meeting to ensure that that 7 points listed above and all addressed. The meetings will be followed up with a paper based review of existing policies/procedures.

A brief report will be provided to each area outlining any recommendations and sharing good practice identified. The Records Manager will offer advice and support where possible in the implementation of recommendations.

If additional resource becomes available a wider number of departments would be covered and more direct methods of review uses including visits to view processes and storage facilities, examine records and interview a wider number of staff.

The precise timetable of the review will be determined in liaison with the departments, the table below provides the broad timeframe in which the review will take place.

| Action | Timeframe | Owner |
|--|----------------------------|-----------------|
| Hold review meeting with each department | January 2012-April 2012 | Records Manager |
| Carry out paper-based review | February 2012-May 2012 | Records Manager |
| Report Back to departments | April 2012-June 2012 | Records Manager |
| Follow-up with departments | August 2012-September 2012 | Records Manager |

7. Annex B – Summary of Recommendations

| No. | Refers to | Recommendations | Implementation Plan |
|-----|-----------|---|---|
| 1 | 3.1 | <i>Develop a standard template policy for management of student records. Departments that wish to develop their own policies and practices should base them on a standard template to reduce duplication and ensure consistent, compliant practices across the University.</i> | <ul style="list-style-type: none"> - A checklist has been drafted listing key policy statements for Student Records Management. The checklist can be used by Colleges/Registry to monitor compliance and record examples of good Records Management practices. - Checklists will be review in 6-12 months time. |
| 2 | 3.2 | <i>Review the University Recommended Retention Schedule to ensure it is clear, concise and practical.</i> | <ul style="list-style-type: none"> - Schedule available on the web to be revised by CD (revised version (3.0) to be published by end Sept 2012) |
| 3 | 3.2 | <i>Ensure the University Recommended Retention Schedule is followed, where records are past the recommended retention they should be reviewed for destruction. In cases where a longer retention period is required (e.g. for accreditation purposed) the reasons for this should be recorded and agreed with the University Records Manager.</i> | <ul style="list-style-type: none"> - Implementation of Retention Schedules is covered by the checklist. |
| 4 | 3.3.1 | <i>As a minimum a sign in/out process is implemented for individual student (hardcopy) files to ensure that there is a full audit trail. A suggested template should be developed centrally and provided to Colleges for adaption and adoption. Following their meeting Registry have already implemented a simple sign in/out process for access to microfiche records.</i> | <ul style="list-style-type: none"> - A template has been drafted and is available on the Records Management webpages for those who wish to adopt it, alternative processes may be implemented. - Implementation of a sign in/out process is covered by checklist |
| 5 | 3.3.1 | <i>A simple listing of record locations is developed to include record description, location, and destruction date. A template will be developed centrally. This is vital to ensure that the University knows where student records actually are and that this is recorded rather than relying on individual's memory/knowledge.</i> | <ul style="list-style-type: none"> - A template has been drafted and is available on the Records Management webpages for those who wish to adopt it, alternative processes may be implemented. - Implementation of a catalogue of records is covered by checklist |
| 6 | 3.3.2 | <i>A brief review should be carried out to ensure that student personal data saved on shared drives is only accessible by those members of staff who require access. A process for keeping access up to date and an annual review is also required.</i> | <ul style="list-style-type: none"> - Review of access to shared drives is covered by checklist |
| 7 | 3.3.2 | <i>Email accounts are not Records Management systems and their use as such may have long term implications for the management of records, in the absence of a simple, easy to implement system and with limited resources email provides a simple system. If possible it is recommended that email management systems such as Oasys are reviewed and if deemed suitable provided to enable a more structured use of email as a records management system.</i> | <ul style="list-style-type: none"> - CD to raise with issue with Exeter IT colleagues for advice |

| | | | |
|----|-------|--|---|
| 8 | 3.3.2 | <i>Ensure that Retention Schedules are applied equally to email and electronic records as well as paper records.</i> | <ul style="list-style-type: none"> - Implementation of Retention Schedules is covered by the checklist. - CD to consider whether additional guidance is required. |
| 9 | 3.3.2 | <i>The use of shared drives and email accounts should be recommended wherever possible.</i> | <ul style="list-style-type: none"> - Covered by checklist |
| 10 | 3.3 | <i>Regular reminders to be circulated by the Records Manager regarding the sharing of personal information.</i> | <ul style="list-style-type: none"> - CD to organise |
| 11 | 3.4 | <i>Preference should be given to digitizing records rather than increasing storage of paper records. When digitization is not possible consideration should be given to purchasing cabinets and units that are fire-proof.</i> | <ul style="list-style-type: none"> - CD to investigate - Covered by checklist |
| 12 | 3.5 | <i>Following a request by several Colleges refresher courses in Data Protection/Records Management should be provided with an opportunity for colleagues to raise specific questions.</i> | <ul style="list-style-type: none"> - Initial email has been circulated to ACMEs to offer Data Protection Refreshers. Where requested College specific sessions will be provided, Colleagues in Cornwall can sign up to a Data Protection Course scheduled for October. |
| 13 | 3.5 | <i>Data Protection Training should be made compulsory for ALL members of staff either through face to face training or more practicable via online training. In the meantime new members of staff should be strongly encouraged to attend Data Protection training. This is likely to be covered by the recently purchased Information Security Training module.</i> | <ul style="list-style-type: none"> - CD to investigate whether this is feasible, this may be covered by the recently purchased Information security training module. |
| 14 | 3.5 | <i>Clear guidance will be provided to departments on what information should be supplied in response to a Subject Access Request.</i> | <ul style="list-style-type: none"> - This has been drafted and is available on the Records Management webpages it will be circulated to Colleagues when they are asked to provide information in response to a SAR. |

CD – Caroline Dominey

Annex C – Student Records Checklist

Following the Review of Student Records Management Processes in Colleges and Registry are advised to use this checklist to ensure that their records are being appropriately managed:

| Student Records Policy Statements | | Evidence (the examples provided should be amended to reflect how the department has implemented the advice) |
|---|---|--|
| Policy & Training | | |
| <input type="checkbox"/> | Staff are aware of University's Records Management Guidance and the advice available. | <i>e.g. covered in induction, information circulated to staff, http://www.exeter.ac.uk/recordsmanagement/</i> |
| <input type="checkbox"/> | The College/Department follows the principles set out in University's Student Records Policy Statements (this checklist). | <i>e.g. University policy accepted and approved at College meeting</i> |
| <input type="checkbox"/> | All staff who deal with Student Records have attended Data Protection Training, participated in on-line data protection training or reviewed the Data Protection web pages during induction recently. | <i>e.g. this is part of induction process, this is included in the PDR objectives</i> |
| Records Retention | | |
| <input type="checkbox"/> | The College/Department has a basic catalogue/listing of its student records. | <i>e.g. University template adopted and stored at N:College Shared Drive</i> |
| <input type="checkbox"/> | The College/Department follows the University's standard records retention schedule OR has developed a specific policy based on University guidance.* | <i>e.g. Annual process in place for the disposal of student records</i> |
| <input type="checkbox"/> | The College/Department has a regular cycle in place for regularly disposing of records. | <i>e.g. Annual process in place for the disposal of student records</i> |
| <input type="checkbox"/> | Email Records are treated with the same importance and follow similar processes as hard copy records. | <i>e.g. Emails are explicitly covered in the retention schedule, emails are regularly managed as records and deleted or filed accordingly</i> |
| Security & Access to Records | | |
| <input type="checkbox"/> | Wherever possible shared drives are used in preference to personal file space to ensure continuity of access to student records | <i>e.g. student records are saved in the appropriate shared file space</i> |
| <input type="checkbox"/> | Access to shared drives which contain student information has been reviewed and a process is in place for removing staff when they leave/change role. | <i>e.g. access reviewed in August 2012, process in place from future updates.</i> |
| <input type="checkbox"/> | A process is in place for tracking hard copy records when they are removed from offices. | <i>e.g. a sign-in/out form has been put in place</i> |
| <input type="checkbox"/> | Digitisation of student records is considered before investing in additional filing cabinets, storage space. | <i>e.g. certain records are no longer held in hard copy, records are stored on shared drives</i> |

Completed by: _____ Date: _____