

## POSTGRADUATE RESEARCH SERVICE: RECORDS RETENTION SCHEDULE (RRS)

### Version history

Version	Date	Note
0.1	27-Feb-2013	First draft, Robin Braysher, Office Supervisor, Postgraduate Research Office
1.0	26-Mar-2013	Revised draft, Vivien Easson, Head of Postgraduate Research Service
1.1	06-Aug-2014	Revised with updated terminology, Vivien Easson, Head of Postgraduate Research Service
2.0	09-Nov-2018	Full revision in line with GDPR/e-filing, Vivien Easson, Head of Postgraduate Research Service

### Version: 2.0

This document gives guidance on the future retention of documents held and owned by the Postgraduate Research Service, comprising the UEA Postgraduate Research Office (PGR) and NBI Graduate Studies Office (GSO). The list is not exhaustive but covers most categories of information held for academic administration purposes. The following notes are to be read in conjunction with the retention schedule. Further information is at the end of this RRS.

1. Office space is at a premium, so full electronic filing has been introduced for all students starting from October 2018 onwards. Paper files are kept for students starting prior to that (including those interrupting or suspended). Paper student files are sent for off-site storage following completion and destroyed after 6 years. Any elements which need to be retained for a different period should be held separately from the student file.
2. The schedule sets periods for which various categories of information are to be retained by the PGR Service.
3. The schedule also refers to committee papers for which the originating office should be responsible for keeping a master set, where one is required.
4. The methods of archiving paper records (off-site with a commercial archiving company) and electronic records (shared drives and Blackboard) are to be kept under review.
5. Any record with personal information is to be treated as confidential and disposed of accordingly.
6. Where information is held on email, or on a personal filestore/OneDrive, the same limits will apply as if the information were archived on the PGR Service shared drive or in hard copy. In many cases this information will be a copy rather than the master file and can be deleted sooner.

This schedule is based on the JISC Higher Education Business Classification Scheme and Records Retention Schedules<sup>1</sup>. Further information about RRSs and their structure including the descriptions of the column headings are available on the UEA website.<sup>2</sup>

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<sup>1</sup> <http://bcs.jiscinfonet.ac.uk/he/default.asp>

<sup>2</sup> <http://www.uea.ac.uk/is/strategies/infregs/Records+management/RRS>

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## 1. General records: strategy, policy, procedures and programme administration

This table relates to records for PGR provision at UEA, which includes the PGR Service, Doctoral College, Graduate Schools, partnerships for doctoral training, all research degree programmes and professional doctorates, researcher development programmes and training pathways.

The term “emerging” refers to work in progress, which may not (or not yet) have been formally approved by the University.

Activity	Record group	Retention period	Action at period end	Notes
<b>Strategy Development</b>	Records documenting agreed developments relating to UEA’s strategy for PGR provision.	Superseded + 10 years	Review for archival value	This includes PGR Executive strategy papers and other PGR/DTP committee papers held by the PGR Service. Data is classified as Confidential unless marked as Open.
	Records documenting emerging developments relating to UEA’s strategy for PGR provision.	Issue of strategy + 1 year	Review for archival value	This includes minutes of working groups and drafts produced by working groups relating to strategy. Data is classified as Confidential unless marked as Open.
<b>Policy Development</b>	Records documenting agreed developments relating to UEA’s policies for PGR provision.	Superseded + 10 years	Review for archival value	This includes PGR Executive policy papers and other PGR/DTP committee papers held by the PGR Service. Data is classified as Confidential unless marked as Open.
	Records documenting emerging developments relating to UEA’s policies for PGR provision.	Issue of policy + 1 year	Review for archival value	This includes minutes of working groups and drafts produced by working groups relating to policy. Data is classified as Confidential unless marked as Open.
<b>Procedure Development</b>	Records documenting agreed procedures relating to UEA’s policies for PGR provision, including contracts and agreements with third parties.	Superseded + 5 years	Review for archival value	This includes all agreed PGR procedures, formal process documents, contracts and agreements. Data is classified as Confidential unless marked as Open.
	Records documenting emerging procedures relating to UEA’s policies for PGR provision.	Issue of procedures + 1 year	Review for archival value	This includes all emerging or proposed PGR procedures, process developments and draft agreements. Data is classified as Confidential unless marked as Open.
<b>Programme administration</b>	Records documenting implementation of new developments for, or continuing operation of, UEA PGR provision including the detailed design and development of courses.	Academic year + 5 years	Destroy	This includes all operational documentation that does not contain bulk personal data (see Section 4 for that). Data is classified as Confidential unless marked as Open. Confidential-Sensitive data should be held separately.

## 2. Postgraduate Research Student Files

Activity	Record group	Retention period	Action at period end	Notes
<b>Admissions</b>	Information about a student's application to study including references and offer letter where these are not held solely on standard PGR admissions or PGR lifecycle systems.	<b>End of student's studies + 6 years</b>  <b>EXCEPT</b> <ul style="list-style-type: none"> <li>• Pass Lists</li> <li>• Examiner Reports</li> <li>• Examiner Checks</li> <li>• Professional Doctorate assessment (See Section 3)</li> <li>• Confidential Casework (See Section 4)</li> <li>• DBS Checks (If held, delete after 6 months)</li> <li>• Details relating to visa refusals (Hold to next immigration audit)</li> </ul>	Destroy	<p>The master copy of this file information is held by the PGR Service. Data is classified as Confidential unless marked otherwise.</p> <p>Listed information <b>must</b> be held on the individual student file, which will be one of the following:</p> <ul style="list-style-type: none"> <li>- an electronic folder on PGR Shared Drive</li> <li>- an electronic folder on NBI Shared Drive</li> <li>- a hard copy file in a PGR Service office</li> </ul> <p>Where listed information exists but is not held in the individual student file (e.g. sensitive personal information), a clear statement should be placed in "Other" on the individual student file listing where the information can instead be found.</p> <p>Supplementary information relating to students will also be held on PGR admissions systems (AY, Connect, AppReview and TargetX), lifecycle systems (SITS, Blackboard) and email. These should normally be destroyed <b>no later</b> than the destruction of the student file, but see the relevant sections below.</p>
<b>Funding</b>	Information about a student's source of funding including copies of grant details and terms and conditions if held.			
<b>Visa</b>	Information held as part of standard visa check procedures or relating to a student's visa.			
<b>Performance, Progress and Engagement</b>	Information about a student's attendance, engagement, progress or performance, where not held only on PGR lifecycle systems (e.g. correspondence, supervisor change).			
<b>Researcher Development</b>	Information relating to a student's engagement with researcher development activities / cohort training.			
<b>Concessions</b>	Information about any requests for concessions (such as extensions, interruptions, changes to mode of study) or extenuating circumstances relating to the student.			
<b>Thesis</b>	Information relating to a student's thesis, arrangements for assessment, correspondence with external examiners.			
<b>Placements</b>	Information relating to placements, whether compulsory or optional, as defined in the UEA Policy on Placements.			
<b>Assignments (Prof Docs)</b>	Information relating to the processing of professional doctorate assignments and assessment.			
<b>Employment (Prof Docs)</b>	Information relating to employment in connection with a professional doctorate.			
<b>Other / Miscellaneous</b>	Information necessary for processing which does not fall neatly into one of the above categories, including requests for information relating to the student from third parties, or statements that further information is held in another file.			

### 3. Postgraduate Research Student Assessment and Examiner Records

This table describes the student assessment and examiner records whose retention period differs from the standard for postgraduate research student files.

Activity	Record group	Retention period	Action at period end	Security class	Notes
Pass List	The formal UEA record that a student has completed their degree successfully	Indefinite	N/A	Confidential	These should not contain any confidential-sensitive information.
Examiner Reports and Details	Name	Indefinite	N/A	Confidential	Held on student record (SITS).
	Records documenting selection and appointment, including professional CV	End of student's studies + 6 years		Confidential	Held as part of student file. <b>Confidential-sensitive information should be screened by a PGR Service manager to determine if it should be held separately from the student file.</b>
	Pre-viva reports of examiners Post-viva report(s) of examiners	Indefinite	N/A	Confidential	Any confidential-sensitive information should be screened as above.
	Right to Work Check documentation	Academic year of end of student's studies + 2 years	Destroy	Confidential-Sensitive	Held on Blackboard, separate from student file. Employers have to keep Right to Work checks for employment + 2 years: see <a href="http://www.gov.uk/check-job-applicant-right-to-work">www.gov.uk/check-job-applicant-right-to-work</a> .
ClinPsyD EdD EdPsyD ProfD	Coursework submissions	End of student's studies + 1 year	Destroy	Confidential-Sensitive	Confidential-sensitive information: must be held securely on site.
	Official transcript (title and type of placements) Assessment forms (single sheet: grade and title)	Indefinite	N/A	Confidential	These should not contain any confidential-sensitive information.
	Placement supervisor reports (where held)	Indefinite	N/A	Confidential	Any confidential-sensitive information should be screened as above.
	Records documenting the conduct/decisions of the Board of Examiners: agenda, minutes, papers, special circumstances, marks, actions taken	Indefinite	N/A	Confidential	Any confidential-sensitive information should be screened as above, and will normally follow the usual procedures related to individual student files rather than being held indefinitely.
	Records documenting practical arrangements for meetings of the Board of Examiners	Academic year + 1 year	Destroy	Confidential	

#### 4. Confidential Casework

Activity	Record group	Retention period	Action at period end	Security Class	Notes
<b>Student Academic Appeal Handling</b>	Records documenting the handling and results of academic appeals by individual students.	Last action on case + 6 years	Review*	Confidential-Sensitive	Appeal files are stored independently of the main student file, which should have a note (in "Other") stating the existence and date of receipt of the submission.
<b>Student Complaint Handling</b>	Records documenting the handling of complaints by individual students where the formal complaints procedure is not initiated.	End of student's studies + 6 years	Destroy	Confidential-Sensitive	Information will be held on student file and destroyed at the same time.
	Records documenting the handling of formal complaints made by individual students against the institution, where held by PGR Service.	Last action on case + 6 years	Review*	Confidential-Sensitive	Complaint files are stored independently of the main student file, which should have a note (in "Other") as above.
<b>Student Discipline Case Handling</b>	Records documenting the conduct and results of academic or non-academic disciplinary allegations and/or proceedings against individual students, including misconduct in research and plagiarism/collusion.	Last action on case + 6 years	Review*	Confidential-Sensitive	Allegation files are stored independently of the main student file, which should have a note (in "Other") stating the existence of an allegation file.
<b>Applicant Appeal or Complaint Handling</b>	Records documenting the handling of complaints by individual applicants where the formal complaints procedure is not initiated.	Last action on case + 1 year	Destroy	Confidential-Sensitive	Information will be held on applicant file and destroyed at the same time.
	Records documenting the handling of formal complaints made by individual applicants against the institution.	Last action on case + 6 years	Destroy	Confidential-Sensitive	Appeal files are stored independently of the main student file, which should have a note (in "Other") as above.
<b>Concessions</b>	Records documenting the concession request and supporting evidence.	Year of request + 6 years	Review*	Confidential-Sensitive	Concessions and DSA files are stored independently of the main student file, which should have a note in "Concessions" stating the existence of the request, and the Concessions Outcome Letter.
<b>Disabled Students' Allowance</b>	Records documenting the DSA request and supporting evidence.	End of student's studies + 6 years	Destroy	Confidential-Sensitive	
<b>Internal records</b>	Internal PGR Service paperwork including anonymised outcome letters and summaries used in training and quality enhancement.	Academic year + 5 years	Destroy	Confidential-Sensitive	Information for training and quality enhancement should be anonymised but still treated as confidential-sensitive.

\* Some documentation may be retained indefinitely: appeals/complaints for ClinPsyD trainees; concession outcomes required to support transcript production.

## 5. Postgraduate Research Applicant Files

Activity	Record group	Retention period	Action at period end	Security class	Notes
<b>Student Recruitment</b>	Records containing summaries and analyses of enquiry, recruitment and retention data.	Current academic year + 5 years	Destroy	Confidential	Largely held electronically as spreadsheets on shared drive, or on Tableau.
	Records documenting the design, conduct and summary results of student recruitment campaigns or events.	Completion of campaign/event + 5 years	Destroy	Confidential	
	Records documenting the design, operation and summary results of student recruitment schemes.	Current academic year + 5 years	Destroy	Confidential	
	Records documenting the handling of enquiries from prospective students.	Current academic year + 1 year	Destroy	Confidential	Data held on Connect/TargetX is covered under ARM RR Schedules.
	Records documenting issue of recruitment materials in bulk to other organisations.	Current academic year	Destroy	Confidential	
<b>Student Admission</b>	Records documenting the handling of applications for admission including interview documentation: successful applications.	End of student relationship + 6 years	Destroy*	Confidential	Archiving or destruction of electronic records in admissions systems will be determined by the ARM RR Schedule. Downloaded copies on shared drive will be deleted with student file.
	Records documenting the handling of applications for admission including interview documentation: unsuccessful applications.	<b>Minimum:</b> Completion of admissions process + 6 months.  <b>Recommended:</b> Completion of admissions process + 1 year.	Destroy	Confidential	<i>Minimum: actions under discrimination legislation must usually be brought within 6 months.</i> SI 2006/1031 Regulations 23, 39 and 42 SI 2003/1660 Regulations 20, 31 and 34 SI 2003/1661 Regulations 20, 31 and 34 Archiving or destruction of electronic records in admissions systems will be determined by the ARM RR Schedule. Downloaded copies on shared drive will be deleted with applicant file.

\* Some documentation may need to be retained until the next immigration audit after that: for example relating to visa refusals (full applicant record).

## 6. Postgraduate Research Administration: data relating to multiple individuals

This table describes the retention schedule for documents which hold data for multiple individuals, where this has not been covered in Section 3.

Activity	Record group	Retention period	Action at period end	Security class	Notes
<b>Communication and/or liaison with funders and PSRBs</b>	Bids, QA/DTP reviews and correspondence not relating to individual students, not otherwise covered in this records retention schedule.	Current academic year + 5 years	Destroy	Confidential	Any confidential-sensitive data should be screened by a PGR Service manager for separate storage/removal if appropriate.
<b>Concessions database</b>	Summary records of all concessions requests made to the PGR Service in a given time period.	Current academic year + 5 years	Destroy	Confidential-Sensitive	Held electronically on shared drive with restricted permissions. Data contains minimal sensitive personal information.
<b>Feedback</b>	Records containing anonymised summaries and analyses of feedback from students, staff and/or examiners.	Current academic year + 5 years	Destroy	Confidential	This includes PRES data and feedback from taught elements of professional doctorates.
	Records documenting routine solicited feedback on from students, staff and/or examiners: individual feedback.	Completion of analysis of feedback	Destroy	Confidential	Analysis of feedback should anonymise it, and consider carefully any particularly sensitive comments.
<b>Operational or management information</b>	Records containing anonymised data on, and analyses of, student numbers and other programme statistics.	Current academic year + 5 years	Destroy	Open, or Confidential	Held electronically – e.g. via Tableau or spreadsheet. Data is not personal so is not confidential-sensitive; it may be confidential if it has commercial value.
	Spreadsheet records containing summaries and analyses of personal, non-sensitive, data relating to large numbers of UEA students (> 10) used for necessary operational programme administration or management information (excluding visa engagement monitoring).	Current academic year + 5 years	Destroy	Confidential-Sensitive	Held electronically – e.g. spreadsheet. Can be held on shared drive, may only be transferred using an encrypted mechanism. <b>Sensitive personal data should not be stored in this format; it should be destroyed as soon as the analysis has been carried out.</b>



Activity	Record group	Retention period	Action at period end	Security class	Notes
<b>Project contact databases</b>	Spreadsheet records containing summaries of personal, non-sensitive data (names/emails) relating to large numbers of interested individuals in/external to UEA, used for communicating information about the project.	Length of project + 1 year	Review against funder needs	Confidential-Sensitive	Held electronically – e.g. spreadsheet. Can be held on shared drive, may only be transferred using an encrypted mechanism.
<b>Records for doctoral training including non-UEA students</b>	Spreadsheet records containing summaries and analyses of personal, non-sensitive, data relating to large numbers of students (> 10), or staff, across multiple HEIs, as part of administration of a doctoral training grant.	End of training grant + 6 years	Destroy	Confidential-Sensitive	Held electronically – e.g. spreadsheet. Can be held on shared drive, may only be transferred using an encrypted mechanism. <b>Sensitive personal data should not be stored in this format; it should either be held separately if it is still required, or destroyed as soon as the analysis has been carried out.</b>
<b>Supervisory and examiner training</b>	Spreadsheet records containing details of staff compliance with supervisory or examiner training.	Current academic year + 1 year	Destroy	Confidential-Sensitive	Held electronically – e.g. spreadsheet. Data should be renewed at least annually and old versions deleted.
<b>Transcript requests</b>	Records documenting the handling of individual students' requests for statements of results/transcripts.	Last action on request + 1 year	Destroy	Confidential	Transcript requests come to us by email from Student Records; they will retain original request and confirmation payment.
<b>Visa Engagement Monitoring</b>	Spreadsheet records containing summaries and analyses of personal, non-sensitive, data relating to large numbers of students (> 10) used for necessary operational programme administration or management information relating to visa engagement monitoring.	Current academic year + 5 years	Review against legislation	Confidential-Sensitive	Records relating to visa engagement may need to be kept longer than five years. Check current legislation at time of review.

## 7. PGR Service staff recruitment, absence and other staff records

Activity	Record group	Retention period	Action at period end	Security class	Notes
<b>Staff recruitment</b>	Post release, advertising paperwork, further particulars	5 years	Destroy	Confidential	On PGR Service Blackboard site
	Applications for employment	1 year after interview	Destroy	Confidential	Held by HR on MyView
	Interview records, reference checks for unsuccessful candidates	Appointment + 1 year	Destroy	Confidential	
	Right to work checks for unsuccessful candidates – S&C posts	Appointment + 1 month	Destroy	Confidential-Sensitive	ALC documents held by HR
<b>PGR Service personnel files</b>	Records documenting the appointment, employment and training of PGR Service staff	1 year after leaving PGR Service	Destroy	Confidential, or Confidential-Sensitive	HR retain files for all UEA personnel for 7 years after leaving UEA
<b>Leave - annual</b>	Records documenting individual staff members' annual leave	Until leave UEA	Destroy	Confidential-Sensitive	Currently held by individual staff for current (and, optionally, previous) holiday years. Will be changing to online system in 2018
<b>Sickness absence</b>	Personal sickness certificates and doctors' certificates	7 years after leaving UEA	Destroy	Confidential-Sensitive	Copies retained by HR and Payroll. Received by PGRS and forwarded at end of each month. Will change to online system in 2018
	OH referrals and records of reasonable adjustments	1 year after leaving PGR Service	Destroy	Confidential-Sensitive	HR retain copies for 7 years after leaving UEA
	Monthly summary of sickness absence	3 years	Destroy	Confidential-Sensitive	Will review after online system introduced by HR
<b>Graduate Intern recruitment</b>	Contract, advertising paperwork, interview paperwork, personnel records, leave, absence	As above, where relevant	Destroy	Confidential-Sensitive	Liaison with Graduate Interns team in Careers

## 8. Authority for data processing and further information

The University is subject to the General Data Protection Regulation and Data Protection Act (2018). See <https://ired.uea.ac.uk/web/hub/information-services/strategy-planning-and-compliance/regulations-and-policies/information-regulations-and-policies/data-protection>.

The University has a Data Protection Policy, and an Information Classification and Data Management Policy, available from the above link. Data is classified as Open, Confidential, Confidential-Sensitive, or Secret, in accordance with the latter policy.

UEA Privacy Notices can be found online at <https://portal.uea.ac.uk/information-services/strategy-planning-and-compliance/regulations-and-policies/information-regulations-and-policies/data-protection/privacy-notices>. The following Privacy Notices are relevant:

- Enquirer Privacy Notice
- Applicant Privacy Notice
- Student Privacy Notice
- Staff Privacy Notice
- Research and Innovation Division Privacy Notice

The legislation underpinning the rationale to hold student records for six years after termination of the student relationship is Section 5 of the UK Limitation Act (1980) <http://www.legislation.gov.uk/ukpga/1980/58/section/5>, which states:

**Time limit for actions founded on simple contract.**

An action founded on simple contract shall not be brought after the expiration of six years from the date on which the cause of action accrued.