

INTERNATIONAL COUNCIL ON ARCHIVES
SECTION ON UNIVERSITY AND RESEARCH INSTITUTIONS ARCHIVES

**DRAFT GUIDELINES ON APPRAISAL AND
DISPOSITION OF STUDENT RECORDS**

Version: August, 2012

1. Foreword

These draft guidelines were produced by The International Council on Archives Section on University and Research Institutions Archives.

Members of the International Council on Archives and other interested parties are invited to give feedback and comments for these guidelines till 12th October, 2012.

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2. Disclaimer

Experts group have drafted these guidelines based on practical considerations that reflect their up-to-date knowledge of appraisal theory and practice. The Guidelines acknowledge that various theoretical approaches may be used when appraising the records. Especially this applies to theories regarding to functional or content appraisal of records. However these Guidelines do not advocate use of any particular method or approach.

3. Scope

These guidelines are intended to be applied to appraisal and disposition of student records regardless of their format and environment in any university regardless of size, profile and legal status, one or multiple fields study and research, private or public etc.;

4. Terms and definitions

For the purpose of this document, the terms and definitions given in:

-ISO 15489-1 Information and documentation- Records Management- Part 1:

General;

-DLM Forum Foundation, MoReq2010: Modular Requirements for Records Systems- Volume1: Core Services and Plug- in Modules, 2011: Part 1, Chapter 13. Glossary

and the following apply:

- 4.1. Appraisal- process of determining how long to keep records.
- 4.2. University- any kind of post-secondary tertiary educational institution (university, academy, institute, college etc.)

5. The concept of student record

By student records in these Guidelines we mean some or all information created or received by university which document:

- 5.1. student's academic progress (i.e., courses taken, grades received and formal notations made by the institutional registrar regarding the student's progress towards receipt of a degree, theses, awards).
- 5.2. class material in whatever form (e-learning, paper etc.).
- 5.3. administrative processes: medical, career placements, disciplinary, financial etc.
- 5.4. students' social life, including (but not limited to) housing, students employment at university or student organizations, volunteer jobs, athletics, governance, organizational activities, social life etc.

6. Policy

6.1. Student records should be covered by an appraisal policy indicating the groups of documents to be destroyed at the end of their retention or retained for permanent preservation. Ideally student records should be a part of a general appraisal policy covering all university records and approved by the competent level of university management.

6.2. If there is no general appraisal policy, a policy on appraisal of student records

should be elaborated and approved by competent management member or institution having authority over the student records.

6.3. Policy should be reflected in retention schedules or similar documents;

7. Responsibility for keeping and disposition of student records

University units or personnel being responsible for keeping student records may vary according to business and legal settings and national traditions. There may be various university units involved in keeping student records: academic departments responsible for teaching students, registrar and/ or archives, information technology units.

7.1. Whatever the responsibility for management of student records might be it should be formally documented. The documentation should include:

7.1.1. Types of records the administering university unit or officer is responsible for.

7.1. 2. Disposition actions to be taken by responsible university unit or officer.

7.2. In order to determine appropriate disposition action, records need to be appraised. Responsibility for the appraisal should be transferred to the archivists or unit responsible for the university archives. Archivists should have the rights to consult stakeholders and competent specialists, such as records creators, registrars, lawyers, particular subject area specialists and others having expertise and interest on studies and students.

7.3. In order to make appraisal decisions compliant to legal and operational requirements it is recommended to have ad hoc or permanent appraisal committees comprised of archivists, stakeholders and competent specialists.

8. Practice of Management of Student records

8.1. Aggregation of student records

8.1.1. Nowadays in most cases student records are kept in both- electronic and paper formats. Data kept in information systems may be born digital or copied from paper records.

8.1.2. Some or all related records may be assembled together in one or

multiple aggregations. Aggregations may be made:

- of related records on particular student, for example grades received and class material produced by a student John Brown or

-case connected with students, for example: assignments of all students from the Public law class in second semester; tuition fees paid by Biology Department students in 2012.

8.1.3. In a paper environment aggregation is made by grouping records in student dossiers or case files. In electronic environment aggregation is ensured by a functionality of electronic records system.

8.1.4. Irrespective of being electronic or paper and aggregated or not aggregated, all records need to be surveyed and listed with appropriate retention periods into records plans, disposition schedules or similar management documents. Data duplicating in electronic and paper environments and/ or in different university units should be indicated.

8.1.5. Retention terms should assigned to aggregations if they contain records with the same retention period. If records within one aggregation have different retention terms these should be indicated in records plans, disposition schedules or similar control records.

8.2. Electronic student records

Student records in electronic form have been since the 1960s. Widespread using of electronic records started in 1990s. Electronic records are managed mostly by proprietary or university self-made or customized software.

8.2.1. Whatever the software, electronic records also need to be covered by appraisal policy;

8.2.2. Attention needs to be paid to disposition of data in electronic records systems. If a system encompasses automatic deletion functionality it needs to request approval from the archivist, system administrator or other competent specialist.

8.2.3. Archivists or other competent records specialist should be consulted regarding the content of data to be managed by electronic information system and their retention periods when designing or improving the system managing electronic records. System management of electronic records needs to maintain the integrity and usability of electronic records and metadata for the entire approved retention period.

9. Personal data in student records

9.1. In many cases student records have sensitive data. Sensitive data in records created nowadays include mainly data on health and ethnicity, data on religious and political affiliation or opinion and sexual preference.

9.2. Because of the presence of personal and, especially sensitive data, access to student records for research purposes should be allowed only after the student's death. Records about living current and former students are mainly accessible only with their permission. In some countries access may be allowed under certain conditions. Conditions may limit access only to certain categories of researchers (those of accredited research institutions, holding PhD etc.), field of research (e.g. historical, demographical). If access is allowed it may be on the condition that it is disclosed only in aggregated and summarized form, not invading the person's privacy.

9.3. When making appraisal decisions presence of the sensitive data or restriction to access should not, by itself, make an argument for destruction of records.

10. Appraisal of student records

10.1. Records should be kept at least to fulfill legal requirements and obligations and operational needs of the university:

10.1.1. Legal requirements are usually reflected in laws, regulations, contracts and similar documents requiring retention of records for a certain period of time. Student records may be used as important evidence in fulfilling universities' and students' rights and obligations, accountability and litigation etc. Laws may require keeping the student records as evidence to be used for calculating pensions or other social benefits.

10.1.2. Operational needs of the university may require student records to support its day to day operations. Data from previous study periods may be required when students resume studies after termination or after graduation enrolls to another program. Credits obtained in studying at one program may be used while studying at another program. Student records may be kept for certain time for performance, statistical or another kind of analysis over time. Records may be maintained and augmented in tracking alumni work life etc.

10.2. After legal and operational needs to keep student records have expired the university should consider appraisal that results in permanent retention of at least part of the student records.

Similar to other records, student records document history of the university and society in general. They are valuable assets for historical, genealogical and other research. University should consider benefits arising from research. Historical

records may be used for writing the university's own history, thus contributing to its identity, promotional campaigns etc. Moreover student records as a source of valuable data may be a prerequisite to attract research funding.

10.3. When doing appraisal these guidelines first recommend to:

10.3.1. Survey if there are copies of records and records with duplicate information. Leaving one original or copy and destroying copies or records with duplicate information may significantly save preservation costs and further need to appraise remaining records.

10.3.2. Survey if there are records or their copies in lower cost forms, e.g. electronic, microforms. If possible the following should be considered over complete destruction of records:

- *retaining copies or originals in lower cost forms or*
- *transfer to lower cost forms.*

10.3.3. However when making decisions about transfer to lower cost forms all the risks associated with preservation and access to transferred records over the time need to be considered.

10.4. If removal of duplicates or conversion to microfilm are not sufficient to meet administrative cost savings goals, then at least the following should be preserved permanently:

10.4.1. Records already used for research to provide proof of research findings.

10.4.2. Records indicating student's academic progress (point 5.1. of these Guidelines).

10.4.3. Sample of other records according to point 10.5. of these guidelines.

10.5. When using sampling these guidelines recommend making at least qualitative sample of records. Qualitative sampling may be made by selecting:

10.5.1. Student records created in certain period, for instance:

- *all records created before 1945;*
- *records created during the time of Nazi regime 1933/ 1939-1945.*

10.5.2. Records of distinguished students chosen by archivist, Appraisal committee and/ or subject area specialists, for instance:

- *records of outstanding chemists or physicists chosen by science historians;*
- *records of notable writers and poets chosen by literary scholars.*

10.5.3. Records of students belonging to specific social groups chosen by archivist, Appraisal committee and/ or subject area specialists, for instance:

records of all women studying before 1950;

10.5.4. Other records representing known research interests.

10.6. After making qualitative samples, these guidelines recommend applying quantitative sampling. Method or methods of quantitative sampling should be chosen by Appraisal committee.

11. Disposal of student records

11.1. Once records are appraised those records having no archival value should be destroyed. These guidelines also recommend the university consider a possibility to give records back to students or to another institution interested in them.

11.2. Taking into account sensitive nature of personal data in student records they should be destroyed in accordance with national legislation for data protection. Any data leaks should be prevented.

11.3. If student records are transferred to other institution interested in them, that institution needs to agree to comply with national data protection legislation.

12. Documentation of disposal

Appropriate documentation should be made about the disposal of records. Documentation should include at least lists of files, aggregations, or types of records to be destroyed or transferred and their volume: files, boxes, bytes etc. Documentation should be approved by competent officer having authority over the University records. Taking into account the national legislation it may be required submitting the documents for external approval to national archival institutions.

13. List of standards and literature

DLM Forum Foundation, MoReq2010: Modular Requirements for Records Systems- Volume1: Core Services and Plug- in Modules, 2011: Part 1

Hull, Felix. The use of sampling techniques in the retention of records: a RAMP study with guidelines. Paris: UNESCO, 1981.

ISO 15489-1 Information and documentation- Records Management- Part 1: General;

Maher, W. The Management of College and University Archives, Scarecrow Press and Society of American Archivists, 1992.

Samuels, Helen W. Varsity letters: documenting modern colleges and universities. Boston: Scarecrow Press, 1992.