

## AA49

## Electronic Student Record Retention

Classification:	Academic Affairs
Responsible Authority:	Registrar
Executive Sponsor:	Senior Vice President, Academic
Approval Authority:	Algonquin College Executive Team
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### PURPOSE

To ensure electronic student records are managed in accordance with acceptable information and record management practices including any applicable legislative requirements. This policy guides the retention of electronic student records including the judicial archiving or disposal of records once college obligations have been met.

### SCOPE

All student records managed and maintained within the Student Information System (SIS) that are created in support of college admissions, student registration, student progression, student encumbrances, financial aid and student awards, fee assessments, final grades, graduation and student transcripts, and as detailed in Appendix 1, are considered in scope.

Other student records held and maintained outside of the Student Information System and specifically noted in the Electronic Student Record Retention Schedule (Appendix 1) are identified as within scope.

Learning Management System Records, including student assignments and submissions, fall outside the scope of this policy. Please refer to Policy AA42: Learning Management System.

### DEFINITIONS

Word/Term	Definition
Current Student Record	Non-permanent student records residing in the SIS are to be destroyed after the established retention period has expired as defined in the Electronic Student Record Retention Schedule.
Data Erasure/Data Clearing	A software-based method of overwriting data in order to destroy.
Electronic Erasure	A software-based method of overwriting the data that aims to completely destroy all electronic data residing on a hard disk drive or other digital media by using zeros and ones to overwrite data onto all sectors of the device. By overwriting the data on the storage device, the data is rendered unrecoverable and achieves data sanitization.

Electronic Record	Any electronic student record stored within the SIS or other approved interface system or archived in a storage format other than in hard copy. This includes any offsite storage facilities and any third party contracted Electronic Records Management interface.
Learning Management System	A Learning Management System hosts materials associated with courses and programs of study, fosters a community of learning through two-way communication and activity and engagement tools, provides a platform to collect and grade assessments, and simplifies monitoring student progression by Faculty.
Other Student Record	Non-current or non-permanent student records residing outside of the Student Information System, which are to be maintained for durations outlined in the Electronic Student Record Retention Schedule (Appendix 1). This list is limited in scope to those records directly dependent upon Student Information System Student Records for Convocation, Co-operative Education, and the Dean's Honours List.
Permanent Student Record	Student records that are to remain on file indefinitely as outlined in the Electronic Student Record Retention Schedule.
Record Disposition	The final retention action carried out on a Record. This may include destruction, deletion, secure destruction or deletion, or transfer for archival review on campus or to a third party.
Secure Record	The protection of information, which includes its confidentiality, integrity and availability.
Student	A Student is any person who is currently enrolled in a course or program at Algonquin College, but who may not yet have registered; who has applied for admission to the College; or who was enrolled in a course or program at the College.
Student Information System	A Student Information System is a management information system for education establishments to manage student data. Generally, Student Information Systems provide capabilities for registering students in courses, documenting grading, transcripts, results of student tests and other assessment scores, building student schedules, tracking student attendance, and managing many other student-related data needs in an educational institution. The current Student Information System at Algonquin College is GeneSIS.
Student Record	A Student Record is a collection of information about a Student vis-a-vis the student's relationship to the College. There are multiple distinct elements of this relationship, each of which exists semi-autonomously.

## POLICY

### 1. General

1. All student records will be retained in a secure record manner for the length of time prescribed in the Electronic Student Record Retention Schedule (Appendix 1).
2. Student records will be stored in a manner that prevents information loss as a result of paper or electronic deterioration; accidental or deliberate destruction; and unauthorized access and disclosure. They will be stored in a manner that ensures their continued accessibility and readability throughout their required lifecycle, which, in the case of electronic records, may require the archiving of required hardware and software, and/or the periodic updating of information to allow access from newer hardware or software. Student records should be duplicated, either physically and/or electronically and backed up. Secondary information storage sites should be sufficiently physically separated from primary sites so as to not be affected by the same information availability risks.

### 2. Record Classification

1. Each component within the student record held at the College will be deemed as either Permanent, Current or Other. The retention period for each component of the student record is identified within the Electronic Student Record Retention Schedule (Appendix 1).
2. The Permanent Student Record will include the following:
  - Student full name, including any previous names, noted within the SIS
  - Student number
  - Date of birth
  - Home and local address (if applicable)
  - Personal Email address
  - College Email address
  - Cumulative academic record including date of admission; course names, numbers and hours; program names; final grades (including transfer credit and Prior Learning Assessment Recognition, grades); Grade Point Averages; year, level and term of course registration; graduate status and date of graduation; record of course or program withdrawal.
  - Record of the credential that was issued and the date of graduation
  - Record of any permanent student encumbrances
  - Social Insurance Number (as applicable to specific student financial records and Revenue Canada requirements)
3. The Current Student Record includes details surrounding applications; registration; appeals; time limited encumbrances; and student financials. Full details of each component of the Current Student Record are found in the Student Record Retention Schedule (Appendix 1).
4. Other Non-Academic Students Records are those held primarily outside of the Student Information System. These records may include those whose maintenance and disposal rules fall under provincial or other regulatory policies. Details of Other Student Records are listed in the Student Record Retention Schedule (Appendix 1).

### 3. Record Disposition

1. Once the lifecycle of a student record has expired, as per the period noted in the Electronic Student Record Retention Schedule, the record must be securely disposed of as per schedule (Appendix 1). Electronic records shall be securely destroyed in accordance with electronic destruction standards as published by Information Technology Services (ITS).

#### PROCEDURE

The retention rules described in this procedure apply to all student records noted within scope, regardless of the medium or format. They also govern records generated from databases and with the aid of software. The retention rules application is based on the informational content of the record rather than on its medium.

<u>Action</u>	<u>Responsibility</u>
<b>1. Maintaining the Electronic Student Record Retention Schedule</b>	
1.1 A review of the Electronic Student Record Retention Schedule must be completed to ensure College or regulatory changes are updated within the Schedule. The Schedule must be updated with its last review date noted and published as an appendix to this policy.	Associate Registrar, Enrolment Systems and Operations
1.2 When a new student record component, a new storage format or a change in a record retention period is identified by a functional unit within the college, the Registrar's Office must be notified to validate and update the Electronic Student Record Retention Schedule (Appendix 1).	College Administrators with accountability for updating or maintaining a student record (See Appendix 1)
1.3 Each functional area within the College that holds accountability for updating and maintaining a student record identified within scope, will determine the period a record remains active and the record disposition. This information will be provided to the Registrar's Office for inclusion and an update to the Electronic Student Record Retention Schedule.	College Administrators with accountability for updating or maintaining a student record (See Appendix 1)
<b>2. Disposition of Student Records</b>	
2.1 The Registrar's Office holds primary responsibility for the retention of student records and for identifying the retention periods. Once the records have met the required periods of retention as noted on the Electronic Student Record Retention Schedule (Appendix 1), authorization is provided to Information Technology Services or other accountable authority(ies) to complete the record disposition.	Associate Registrar, Enrolment Systems and Operations

<u>Action</u>	<u>Responsibility</u>
2.2 Records held within the SIS and its interfaces that are identified for destruction within the Student Records Retention Schedule will be scheduled and destroyed or archived on a predetermined basis. Detailed Student Record deletion and archival reports will be retained by those responsible for the record maintenance to confirm the disposition has been completed.	Manager, Information Security and Privacy
2.3 All hard-copy and electronic documents held within various college departments containing a record identifying a student will be securely destroyed in the timeframe identified in the Electronic Student Record Retention Schedule (Appendix 1).	College Administrators with accountability for updating or maintaining a student record (See Appendix 1)

## SUPPORTING DOCUMENTATION

**Appendix 1:** Electronic Student Record Retention Schedule

## RELATED POLICIES

AA11 Registration  
 AA14 Grading System  
 AA35 Confidentiality of Student Records  
 AA39 Program Progression and Graduation Requirements  
 AA42 Learning Management System  
 AD02 Freedom of Information and Protection of Privacy  
 IT01 Information Security  
 SA05 Scholarships, Awards and Bursaries  
 SA06 Fees  
 SA07 Student Conduct  
 SA08 Fee Deferral

## RELATED MATERIALS

None

## Appendix 1:

### ELECTRONIC STUDENT RECORD RETENTION SCHEDULE

The Student Record Retention Schedule identifies the minimum retention period in which stated student record information will be stored and available for review. The records must be retained safely and securely for the length of time prescribed in this Retention Schedule.

#### Permanent Student Record

Record Details	Period to Remain Active	Authority	Disposition
Student Full Name, Including Previous Names	Indefinitely	Registrar's Office	Must Remain Active
Student Number	Indefinitely	Registrar's Office	Must Remain Active
Social Insurance Number (If Gathered)	Indefinitely	Registrar's Office	Must Remain Active
Date of Birth	Indefinitely	Registrar's Office	Must Remain Active
Last Home and Local Address	Indefinitely	Registrar's Office	Must Remain Active
<i>Cumulative Academic Record:</i> <ul style="list-style-type: none"> <li>• date of admission, if applicable;</li> <li>• course number, hours and title of the course(s) in which the student registered, and</li> <li>• program name and number where applicable;</li> <li>• final grade/status assigned in each course;</li> <li>• date of the academic term in which the grade/ status was assigned;</li> <li>• term Grade Point Average (G.P.A.) and the cumulative G.P.A. where applicable;</li> <li>• graduation status and date, or where applicable, leaving status and date;</li> <li>• final permanent record summary for certain Health Sciences programs;</li> <li>• Record of course and or program withdrawal</li> </ul>	Indefinitely	Registrar's Office	Must Remain Active
Student Transcript	Indefinitely	Registrar's Office	Must Remain Active
Record of Some Academic and Disciplinary Encumbrances	Indefinitely	Registrar's Office	Must Remain Active

## Current Student Record

Record Details	Period to Remain Active	Authority	Disposition
<p><i>Applicant Records</i></p> <ul style="list-style-type: none"> <li>• Program applications received from the Ontario College Application Service (OCAS) or other sources</li> <li>• Records of changes to program choices</li> <li>• Records of changes to personal information</li> <li>• Supporting admissions documentation (in SIS or in the Electronic Document Management Software)</li> <li>• High school records</li> <li>• Releases of information for applicants</li> <li>• Transcripts from other Post-Secondary Institutions</li> <li>• Records of visas and status in Canada</li> </ul>	Two years after the term for which the application was received	Registrar's Office	Archive
Applicant Admission Test Records Academic Upgrading Promotion Results; Canadian And International EAP Student's Placement Results	7 years	Student Support Services	Destroy
Fee Assessments and Payment Records	10 years	Finance	Destroy
Taxation Records (T2202A and T4A forms)	10 Years	Finance	Destroy
Record of Request for Exception to Refund Policy	2 years	Registrar's Office	Destroy
Sponsorship Letters and Records	2 years	Registrar's Office	Destroy
<p><i>Registration Records</i></p> <ul style="list-style-type: none"> <li>• Record of registration and changes</li> <li>• Changes to personal information</li> <li>• Record of grade(s) and academic appeal(s)</li> <li>• Records of withdrawal</li> <li>• Record of program change</li> <li>• Other documents in support of student registration activity</li> <li>• Records related to full-time and part-time statuses and accommodations</li> <li>• Course and exam timetables</li> <li>• Transfer Credit statuses</li> <li>• Off-Audit Activity Registration forms</li> </ul>	Three years beyond the date of registration activity	Registrar's Office	Archive
Record of Financial Non-Permanent Academic Encumbrances	Until cleared	Registrar's office	Archive

Record Details	Period to Remain Active	Authority	Disposition
Apprentice Registration Records	Three years after the last registered term (to allow for the known work periods between in-class study)	Registrar's Office	Destroy
Records of Release of Information for Registered students	One year after the last registered term	Registrar's office	Destroy
<p><i>Records related to Loans and Grants:</i></p> <ul style="list-style-type: none"> <li>All documentation required to support the distribution of Ontario Student Assistance Program funds to students, including changes, appeals and other supporting documentation. (Based on OSAP records management guideline)</li> <li>Records related to other sources of funding</li> </ul>	<ul style="list-style-type: none"> <li>The paper must be maintained for transfer to ministry archiving for a 3-year period.</li> <li>Retain records held in SIS for an additional year 3 years</li> </ul>	Registrar's Office	Destroy

#### Other Student Records

Record Details	Period to remain active	Authority	Disposition
<i>Convocation Book</i>	One copy is held as a permanent record	Registrar's Office	One copy is held, and others destroy
Co-operative Education Records	8 years	Co-operative Education	Destroy
Dean's Honour Lists	8 year	Registrar's Office	Destroy