# **DATA**PROTECTION

## Guidelines on the retention of student data and records



## Introduction

### Why do we need a data retention policy?

- We need to comply with the requirement of the General Data Protection Regulation that personal
  data is not kept for longer than necessary. If we retain personal data for longer than we need to, we
  breach the requirement that personal data must be relevant and limited to what is necessary to meet
  our purposes.
- We need to keep data for as long as it is required to meet operational purposes or for organisational archiving relating to scientific, historical research or statistical purposes.
- We need to ensure best use of storage space, both physical and digital.

#### Scope

- This guidance seeks to provide indicative guidance for those responsible for managing student records and student administration. It covers the main corporate systems such as SITS, CMIS, GSR, TMS, Canvas, Inspera, DWH, and local Access databases, Excel spreadsheets, email and paper, for example, interview scores held locally in a departmental database.
- Data extracted from master systems and stored in local drives or email should be destroyed after use to avoid unnecessary duplication, and to ensure data is not held for any longer than necessary.
- Excluded: Retention guidelines for maintaining transactional records, for example retention of requests for transcripts.
- Appeals: Where there is an appeal in process, then all available documents should be retained to support the appeal process through to completion and then be held for the appeals process retention period.

#### Retention periods

- The master copy of data should <u>not</u> be deleted before the expiry of the retention period.

  Supplementary copies (e.g. Excel downloads or working files) should be deleted before the retention period when they no longer serve a purpose and must be deleted as soon as is practical.
- Backup processes are also affected by retention period guidance as there is an extra period of
  retention to consider, all systems data usually has a backup/backup archive, which is likely to store
  data for a short period of time for quick retrieval requirements. However, some services may also
  have longer term immutable backups, which will retain the data for an extra period to allow for
  cyber/disaster recovery scenarios. Refer to the University backup policy for the relevant service for

- more information, therefore confirming (Retention schedule = retention schedule + backup/backup archive period).
- When retention period is reached, the data should be destroyed as soon as practicable and in a secure manner. In practice, the SITS/eVision record deletion process will take place annually in August: when SITS/eVision records reach the deletion date they will be deleted in the subsequent August.

## Related documents and links

This document is found at:
Retention schedules - Personal data

Data protection policy

**Data Protection: Guidance** 

Data Protection enquiries: email: data.protection@admin.ox.ac.uk

Information compliance enquiries: email: <a href="mailto:information.compliance@admin.ox.ac.uk">information.compliance@admin.ox.ac.uk</a>

- 11	O	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record
							Owner

# Document navigation

Here are the sections that make up the Student Record Retention Policy document for the period 2024-2025.

The section heading above are repeated on each page to show the column title throughout the policy document.

Click on the sections below to navigate to the top of that section: e.g. Course to see the retention policy information relating to Course data.

You can also navigate at any point throughout the document by using the 'Quick links' available at the bottom of each page.

- A. Admissions
- **B.** Careers
- C. Course
- D. Exams and assessments
- E. Fees and funding
- F. Person
- G. Post award
- H. Research students
- I. Students on course
- J. Student support
- K. Higher doctorates

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
Adm	nissions					
A.1.1	Application details (central): successful candidates who enrol	Information to enable recruitment and funding panels to determine admissions outcomes	interview and admissions test scores, and scripts, previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	ADSS, SITS & eVision, paper copies in central teams, data warehouse, definitive dataset (including its processing files), other reporting Access databases	permanent in master system (SITS/eVision); else: End of student relationship + 6 years  Pseudonymised records held indefinitely in data warehouse / dedicated reporting server.  UCAS Personal Statements and References are held only during the cycle and are not retained beyond this.	GAR and UAO
A.1.2	Application decisions (central): successful candidates who enrol	Information on application decisions	college and departmental decisions, offers (central administration)	ADSS, SITS & eVision, paper copies in central teams, data warehouse, definitive dataset (including its processing files), other reporting Access databases	permanent in master system (SITS/eVision); else: End of student relationship + 6 years Pseudonymised records held indefinitely in data warehouse / dedicated reporting server.	GAR and UAO
A.2.1	Application details (colleges): successful candidates who enrol	Information to enable recruitment and funding panels to determine admissions outcomes	interview and admissions test scores, previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	Paper copies in colleges, local electronic records and systems for distribution and storage (PDF, Excel and Word)	End of student relationship + 6 years	Colleges
A.2.2	Application decisions (colleges): successful candidates who enrol	Information on application decisions	college decisions, offers (local administration)	Paper copies in colleges, local electronic records and systems for distribution	End of student relationship + 6 years	Colleges

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
				and storage (PDF, Excel and Word)		
A.3.1	Application details (departments): successful candidates who enrol	Information to enable recruitment and funding panels to determine admissions outcomes	interview and admissions test scores, previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	Paper copies in departments, local electronic records and systems for distribution and storage (PDF, Excel and Word, SharePoint, MS Teams), Slate (Said Business School)	End of student relationship + 6 years	Departments
A.3.2	Application decisions (departments): successful candidates who enrol	Information on application decisions	departmental decisions, offers (local administration)	Paper copies in departments, local electronic records for distribution and storage (PDF, Excel and Word)	End of student relationship + 6 years	Departments

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.4.1	Application details (central): unsuccessful candidates; successful candidates who don't enrol	Information to enable recruitment and funding panels to determine admissions outcomes	interview and admissions test scores, previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	ADSS, SITS & eVision, paper copies in central teams, data warehouse, definitive dataset (including its processing files), other reporting Access databases	End of the admissions cycle in which applied plus one year for full records. Permanent: pseudonymised records without supporting documentation for all applicants, held in data warehouse / dedicated reporting server.  An identifiable skeleton application record is also kept for a subset of unsuccessful applicants where another relationship (e.g. subsequent application or student record) is active. This is to allow applicant ID matching and retain continuity of records, preventing data errors downstream.  UCAS Personal Statements and References are held only during the cycle and are not retained beyond this.  Financial data relating to the payment of the graduate application fee will be held for 7 years.	GAR and UAO
A.4.2	Application decisions (central): unsuccessful candidates; successful candidates who don't enrol	Information on application decisions	college and departmental decisions, offers (central administration)	ADSS, SITS & eVision, paper copies in central teams, data warehouse, definitive dataset (including its processing files), other reporting Access databases	End of the admissions cycle in which applied plus one year for full records. Permanent: pseudonymised records without supporting documentation for all applicants, held in data warehouse / dedicated reporting server.	GAR and UAO

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.5.1	Application details (colleges): unsuccessful candidates; successful candidates who don't enrol	Information to enable recruitment and funding panels to determine admissions outcomes	interview and admissions test scores, previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	Paper copies in colleges, local electronic records and systems for distribution and storage (PDF, Excel and Word)	End of the admissions cycle in which applied plus one year for full records. Permanent: anonymised skeleton records without supporting documentation.	Colleges
A.5.2	Application decisions (colleges): unsuccessful candidates; successful candidates who don't enrol	Information on application decisions	college decisions, offers (local administration)	Paper copies in colleges, local electronic records and systems for distribution and storage (PDF, Excel and Word)	End of the admissions cycle in which applied plus one year for full records. Permanent: anonymised skeleton records without supporting documentation.	Colleges
A.6.1	Application details (departments): unsuccessful candidates; successful candidates who don't enrol	Information to enable recruitment and funding panels to determine admissions outcomes	interview and admissions test scores, previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	Paper copies in departments, local electronic records and systems for distribution and storage (PDF, Excel and Word, SharePoint, MS Teams), Slate (Said Business School)	End of the admissions cycle in which applied plus one year for full records. Permanent: anonymised skeleton records without supporting documentation.	Departments
A.6.2	Application decisions (departments): unsuccessful candidates; successful candidates who don't enrol	Information on application decisions	departmental decisions, offers (local administration)	Paper copies in departments, local electronic records and systems for distribution and storage (PDF, Excel and Word, SharePoint, MS Teams), Slate (Said Business School)	End of the admissions cycle in which applied plus one year for full records. Permanent: anonymised skeleton records without supporting documentation.	Departments

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.7.1	Data in application system: Application for postgraduate courses not submitted	Data saved to enable applicants to continue with their application	previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	SITS & eVision, paper copies in central teams	Current admissions cycle + 1 year for full records.	GAR
A.7.2	Data for application for postgraduate courses not submitted (colleges)	Information to enable applicants to complete their application if submitted	previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	Paper copies in colleges, local electronic records for distribution and storage (PDF, Excel and Word)	Current admissions cycle + 1 year for full records.	Colleges
A.7.3	Data for applications for postgraduate courses not submitted (departments)	Information to enable applicants to complete their application if submitted	previous qualifications, previous education, supporting statements, references, personal data covered under Person (section F).	Paper copies in departments, local electronic records for distribution and storage (PDF, Excel and Word)	Current admissions cycle + 1 year for full records.	Departments
A.8	Data for applicants for postgraduate courses: Surveys	Information to enable survey invitations to be sent to applicants, information received in survey responses	Name, course applied to, other institutions applied to	Online surveys (formerly BOS), Excel	End of the admissions cycle in which applied plus one year for full records. Permanent: anonymised survey results	GAR

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.12	Enquiries and contact information from students, prospective applicants and applicants to undergraduate courses, graduate courses and graduate access programmes	To respond to enquiries and allow tracking of enquiries received	enquirer name and contact information, enquiry details, enquiry date, metadata associated with site visitors e.g. IP address	Oracle Service Cloud (formerly RightNow)	All enquiries to be deleted 2 years after closure.  Contact records selectively deleted after 2 years:  a. All contacts without an associated enquiry record from the last 2 years will be deleted, except for  b. permanent retention of teacher contacts for undergraduate admissions, with deletion on request.  Metadata associated with site visitors (e.g. IP address, browser metadata) deleted after 90 days.	UAO, GAR, SFF, Alumni, PAD

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.13	Graduate access programmes (e.g. UNIQ+ & Wellcome BVS): unsuccessful candidates; successful candidates who don't enrol	Personal data submitted during applications to graduate access programmes used for: assessment of applications	Individual data about applicants including name, DOB, email address, postal address, postcode, telephone number, school, undergraduate institution including subject and qualifications, employment including income, disability, gender, ethnicity, in-care status, young carers, free school meals, first generation HE, financial support at university, parental/guardian degree status.	Word, Excel, OSC (Oracle Service Cloud – enquiry management system), SharePoint, paper copies.	Current application cycle + 1 year after which data will be kept permanently in pseudonymised records. (See also A.15 and A.16 for retention of data required for evaluation of programme and outreach activity) Pseudonymised information retained by the Wellcome Trust in accordance with their privacy and retention policy.	GAR

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.14.1	Graduate access programmes (e.g. UNIQ+ & Wellcome BVS): successful candidates who enrol	Personal data submitted during applications to graduate access programmes used for: assessment of applications; project and supervisor information	Individual data about applicants including name, DOB, email address, postal address, postcode, telephone number, school, undergraduate institution including subject and qualifications, employment including income, disability, gender, ethnicity, in-care status, young carers, free school meals, first generation HE, financial support at university, parental/guardian degree status.	Word, Excel, Outlook, OSC (Oracle Service Cloud – enquiry management system), SharePoint, paper copies.	End of relationship + 10 years, then permanent retention in pseudonymised records.  (See also A.15 and A.16 for retention of data required for evaluation of programme and outreach activity)  Pseudonymised information retained by the Wellcome Trust in accordance with their privacy and retention policy.	GAR
A.14.2	Graduate access programmes (e.g. UNIQ+ & Wellcome BVS): successful candidates who enrol	Personal data submitted for pre-arrival assessment of disability support requirements; personal data submitted for programme administration related to the organisation of events.	Individual data about applicants including disability information, event attendance, dietary information.	Word, Excel, Outlook, OSC (Oracle Service Cloud – enquiry management system), SharePoint, paper copies.	Current application cycle + 1 year for, after which data will be deleted. (See also A.15 and A.16 for retention of data required for evaluation of programme and outreach activity)	GAR

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.15	Graduate access programmes (e.g. UNIQ+ & Wellcome BVS): measuring effectiveness	Personal data submitted during applications to graduate access programmes used for: surveying graduate access programme applicants and participants; processing information received in survey responses; evaluation and reporting of programme effectiveness.	Minimised applicant record: Name, DOB, gender, email address, postal address, postcode, telephone number, school, undergraduate institution including subject and qualifications, disability, gender, ethnicity, in care status, young carers, estrangement, homelessness, refugee, free school meals, first gen HE, student finance.	Word, Online surveys (formerly BOS), Excel, Adestra email client, paper copies, Tableau.	Current application cycle + 10 years, after which data will be kept permanently in pseudonymised records.	GAR

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.16	Outreach (undergraduate admissions and graduate admissions): HEAT (Higher Education Access Tracker)	Evaluation of outreach activity	Individual data about outreach participants such as name, dob, postcode, school, qualifications, disability, gender, ethnicity, in care status, young carers, free school meals, first gen HE, parental occupation, estrangement, homelessness, refugee, student finance.	Colleges, departments, and central teams may use Word, Excel, PowerBI, HEAT, Access, Web forms, paper copies.	Students with permission to track and a complete record will be retained for 15 years from when their HE ready year indicates they are able to enter HE.  Students who have given permission to track but don't have a complete record will be deleted 7 years after their record was first created  At annual review, students who have not given their permission to track will be deleted 7 years after their record was first created. The link to the published UG/HEAT privacy notice included at the bottom of this section contains separate links to the HEAT and HESA privacy notices.  PG: In accordance with the published HEAT data privacy policy.  www.ox.ac.uk/admissions/undergraduate/incr easing-access/heatprivacynotice	UAO and GAR

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.17	Outreach undergraduate admissions: Personal data	Personal data related to participants to assist with safeguarding, risk assessment and facilitate participation in outreach activity	Name; Address; Disability; Dietary; DOB; postcode, qualifications, gender, ethnicity, in care status, young carers, free school meals, first gen HE, parental occupation.	Excel, Access, Caspio, Webforms, paper records, onlinesurveys.ac.uk, UNIQ website	11 years after intervention (UNIQ) i.e. until individual is 27. For different periods: Student [Personal Info including gender, dob, address, schools]: UNIQ applicant year + 10 years. Agreement status: UNIQ applicant year + 10. Teacher reference Data: UNIQ applicant year + 3 or 1 if not a participant. Raw listed subject & grades, highers studying: UNIQ applicant year + 4. Equality Information [including disability, ema, ethnicity, parental details]: UNIQ applicant year + 10 or 5 if not a participant. Further details [including diet, disabilities, medication, emergency contact]: UNIQ applicant year + 5. Undergraduate admissions: UNIQ applicant year + 10 Personal Statement: UNIQ applicant year + 2	UAO
A.18	Recruitment and Marketing: Personal data collected in connection with prospective applications to graduate courses	Personal data related to registration for mailing lists; registering for attendance of recruitment events and post-event surveys.	Name, email, address, disability (for building access requirements), dietary requirements, dob, current institution, current course, questions/comments in connection with social media advertising.	Excel, Webforms, paper records, Adestra (mailing lists), Social Media platforms (replying to queries/comments), Online surveys (formerly BOS), University website	End of the admissions cycle plus one year for full records (except social media), after which data will be kept permanently in pseudonymised skeleton records.  Permanent: user-generated data on social media (e.g. likes, comments and shares) remain permanently stored on the platform.	GAR

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.19	Recruitment and Marketing: Personal data collected to support graduate marketing activity	Release/consent forms (audio visual); copyright and attribution data for images, video and audio recordings uploaded to the website and social media; current student and alumni registration data for events, focus groups and competitions.	Name, email, address, disability (for building access requirements), dietary requirements, dob, current institution, current course.	Excel, Webforms, paper records, Social Media platforms (attribution data for audio and visual media), University website	End of the admissions cycle plus one year for full records, after which data will be kept permanently in pseudonymised skeleton records, excluding supporting documents (e.g. consent forms) which will be deleted.  Permanent: data required to maintain copyright and attribution log for images, video and audio recordings.	GAR
A.20	Recruitment and Marketing: Personal data collected in connection with prospective applications to undergraduate courses	Personal data related to sign-ups for mailing lists, sign-ups for events, feedback surveys, release forms (audio visual), copyright and attribution data for images, video and audio recordings uploaded to the website and social media	Name, email, address, current institution, mature student, disability, care experienced	Excel, Webforms, paper records, Adestra (mailing lists), Social Media platforms (attribution data for audio and visual media)	End of the admissions cycle in which applied plus one year for full records.  Permanent: data required to maintain copyright and attribution log for images, video and audio recordings.	UAO

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
A.21	Recruitment and Marketing: Personal data collected to support undergraduate marketing activity	Release/consent forms (audio visual), copyright and attribution data for images, video and audio recordings uploaded to the website and social media	Name, email, address, current institution, current course, current college.	Excel, Webforms, paper records, Social Media platforms (attribution data for audio and visual media), University website	Permanent: data required to maintain consent, copyright and attribution log for images, video and audio recordings	UAO
A.22	Information on relevant, unspent criminal convictions	So that appropriate steps can be taken to facilitate effective support and/or assess whether a prospective student poses an unacceptable risk to students and staff.	Declaration of whether an applicant has a relevant, unspent criminal conviction (Y/N), alongside further paperwork required for the Criminal Convictions Panel.	Declaration (Y/N): SITS: Vision (PG), Online surveys (UG) Additional paperwork: paper and electronic files (director of GAR/UAO)	For those who do not enrol: end of admissions cycle plus one year For those who do enrol: end of student relationship plus 6 years	UAO and GAR
Care	eers					
B.1	Careers	Information to support the collegiate University's management of careers services.	careers meetings, internship applications, internship placements,	Events and Vacancy database, held and managed by gti, 3rd party supplier of TargetConnect	Duration of enrolment +3 years	Careers

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
B.2	Careers intentions	To provide schools with career registration data for their students, and the University with aggregate career intention data	name, social background data, career intention, industry interest	SurveyMonkey and then the careers Service	End of student relationship + 6 years	Careers
B.3	DLHE / Graduate Outcomes	Survey information from recent graduates	job title, job details, company, dates, salary	Careers, SDMA, data warehouse	End of student relationship + 6 years pseudononymised data held in data warehouse permanently	Careers
B.4	Internship placements	Information to support the collegiate University's publication of internships.	internship placement, company, recruiter contact details, dates, income	Events and Vacancy database, held and managed by gti, 3rd party supplier of TargetConnect	Company information including recruiter's contact details remains until company asks for it to be deleted, or when they inform the university, the recruiter has left their company	Careers
B.5	Job opportunities	Information to support the collegiate University's publication of job opportunities	job title, job details, company, recruiter contact details, dates, income	Events and Vacancy database, held and managed by gti, 3rd party supplier of TargetConnect	Company information including recruiter's contact details remains until company asks for it to be deleted, or when they inform the university, the recruiter has left their company	Careers
Cou	rse					
C.1	Incorporations	Information relating to incorporated degrees		SITS, paper copies	paper copies +3 years following incorporation; Permanent in master system i.e. SITS/eVision	Education Services
C.2	Matriculation lists - hardcopies	Recording matriculation attendance	name, title, subject, type, owning department(s)	SITS, paper copies	paper copies +4 years following matriculation; Permanent in master system i.e. SITS/eVision	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
C.3	Module and assessment details	Description of course structures for teaching and assessment, for publications (prospectus) and for resource allocation.	title, length, subject, offerings, owning department(s)	SITS & EVision, data warehouse	Permanent in master system i.e. SITS/eVision	Education Services
C.4	Programme creation and amendment data	Programme and module approval information	title, length, subject, type (UG, PGT, PGR) curriculum, syllabus, owning department(s), approvers	SharePoint, paper files, emails	Set-up date + 6 years	Education Services
C.5	Programme details	Description of course structures for teaching and assessment, for publications (prospectus) and for resource allocation.	title, length, subject, type (UG, PGT, PGR) curriculum, syllabus, owning department(s)	SITS & EVision, data warehouse, TUMS	Permanent in master system i.e. SITS/eVision, TUMS	Education Services
Exar	Exams & Assessments					
D.1	Exam Adjustments	Administer exam adjustments (e.g. extra time)	student names, student personal information such as health, alternative arrangements made	CMIS, E&A SharePoint sites, E&A local databases and excel + SITS/E vision	End of student relationship + 1 year for colleges and departments. +6 years for E&A held records. End of student relationship +6 years for data held in EVision/SITS.	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
D.2.1	Assessment marking	Administering the marking of examination scripts and submissions; collating examination results; issuing pass lists and individual notifications of examination results and handling	Examiner names, scaling activities, results and outcomes	Exam Board files	2 years after release of results	Education Services
D.2.2	Examiners reports	appeals.  Demonstrating examiners' quality assurance arrangements, demonstrating that they have adhered to University regulations, policy and procedures, and met expectations regarding academic standards.	Summary statistics of exam performance, details of new examining methods and procedures, equality & diversity considerations. Section E of Part II contains comments on the performance of identifiable individuals.	Exam Board files	Section E of Part II should be retained for one year following the final exam board meeting. The remainder of the report will be retained in local committee papers according to the retention policy for those committee papers, as outlined in D.2.1 above	Departments
D.3	Exam papers	Content of exam papers	exam paper questions	WebLearn, Word, Oxam	Retained until examination sat, thereafter permanent copy kept on OXAM.	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
D.4	Examination entry	To enter students on to examinations and assessments, to inform administration and operations and to provide information for student record	Examination entry, change in options and late options	eVision, University Shop	End of student relationship + 6 years	Education Services
D.5.1	Examinations	Information to support the University's administration of examinations.	administering examination materials; timetabling and organising examinations; attendance monitoring. Student timetables (dates, venues), alternative arrangements (extra time, computer access)	CMIS, E&A local databases, SharePoint and Excel + SITS/E vision for individual timetables	2 years after the final examiners' meeting (where results are finalised). For multi-part examinations, this means 2 years after the final examiners' meeting for the final Part.	Education Services
D.5.2	Examinations	Requests made under Part 14 Examination Regulations	names of students, examination request documentation, supporting evidence such as medical data, outcome of consideration	Dynamics and linked SharePoint site, Excel	End of student relationship +1 year for colleges and departments. +6 years for Proctors Office held records	Proctors Office, Departments and Colleges
D.6	Examiner appointment	to appoint examiners to examine student assessment	name, contact details, examination, examiner type	EAP, HRIS, hardcopy forms + SharePoint	Exam board notes - permanent. Otherwise, termination of appointment + 6 years for administrative records.	Education Services
D.7	Examiner payment	to pay examiners for examining student assessment	name, contact details, payment (banking) details	EAP, hardcopy expenses claim form, Financials + SharePoint	Termination of appointment + 6 years (Financial record regulations)	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
D.8	Mitigating Circumstances Notice to Examiners (Applications)	review mitigating circumstances at examination boards.	student names, student personal information such as health, action taken in response to mitigating evidence.	eVision, E&A SharePoint sites, E&A local databases and excel	End of student relationship + 1 year for colleges and departments. +6 years for E&A held records. End of student relationship +6 years for records held in SITS.	Education Services
D.9	Mitigating Circumstances Notice to Examiners (Outcome)	The outcome of the review of mitigating circumstances applications by examination boards	student names, student personal information such as health, action taken in response to mitigating evidence.	eVision, E&A SharePoint sites, E&A local databases and excel	End of student relationship + 1 year for colleges and departments. +6 years for E&A held records. End of student relationship +6 years for records held in SITS.	Education Services
D.10	Invigilators	Appointment, training and rotas of Invigilators	recruitment data, training information, training attendance, examination rotas	E&A local databases	Current academic year + 1 year	Education Services
D.11	Prizes: determination of prizes awarded to individual students	Consideration of allocation of prizes to students	names of students considered, results, discussion outcomes.	Departmental and college	Current academic year + 1 year	departments and colleges
D.12	Prizes: outcome of prizes awarded to individual students	Record of prizes made to students by departments and colleges	student names, student prizes awarded	SITS4Colleges, departmental and college.	Permanent record	departments and colleges
D.13	Student Assessment activity and outcomes	Details of assessments, dates taken and results.	student assessment enrolments (assessment titles and when taken) and results outcome	Core student record system (SITS & eVision), GSO paper files, results lists, data warehouse	Post 2007 - Permanent in master system(s). Data held outside of master systems (e.g. excel, local databases) 2 years after release of results as per instructions in Examinations and Assessment Framework. Pre-2007 - One copy held permanently in departmental and college systems where they exist.	Records after 2007 - Education Services, departments and colleges Records pre-2007 - departments and colleges

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
D.14	Student assessments: research students (submitted work)	student work to be assessed	research students' theses (submitted work)	Digital copies for examiners held in RTDS and department systems.	Student given Leave to Supplicate + 6 months (Under review by Education Committee in light of changes to OfS requirements)	Education Services
D.15	Student assessments: taught students (submitted work)	student work to be assessed	student exam scripts and submitted work	Mostly hard copies. Some digital copies held in Canvas, Inspera and department systems.	Final Exam Board meeting + 6 months (Under review by Education Committee in light of changes to OfS requirements)	Education Services
D.16	Submissions Administration	Information to support the University's administration of submitted assessments.	Assessment titles offered, submission dates, late and non-submissions	E&A local databases, SharePoint and Excel + SITS/eVision	Final Exam Board meeting + 6 months (Under review by Education Committee in light of changes to OfS requirements)	Education Services
D.17	Student assessments: Collections	Details of collection assessments	Assessment titles, dates taken, results outcomes	College systems	Dependent on the system used by the individual college. All colleges using College Records (SITS) functionality to create and hold this data will retain collection records indefinitely as part of the student's permanent record. Any colleges who locally retain collections data on a separate system will not be subject to the same data retention requirements.	Colleges  NOT OWNED BY THE UNIVERSITY

university's

student fees.

publicise the

collegiate

levels

University's financial support schemes and fee

Information to

management of

Financial support publicity

(fees and funding (internal

and external sources))

E.2

Fees & Funding

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
Fees	& Funding					
E.1	Student Fees & Funding: Fee administration (including fee schedule)	Determination of fee liability, record of payments and late/non-payments (including amounts). Liaison with SLC and Research Councils and other funders. Production of fee schedule to support the collegiate	payments, correspondence about payments, bank details, students fee liability, fee status, fees due, enrolment records, late/non-payment, sponsorships (including central funding)	Email, Word/Excel documents, SITS & eVision, local Access database	End of student relationship + 6 years, and at least seven years after the point which the fees applied to, unless permanent retention of some details is required by Financial for historical/archiving purposes.  Information on fees charged to students is permanent in HESA files.  *records for offer holders who do not commence study should be deleted in line with the admissions policies for successful	Fees & Funding

MS Dynamics (SFF Fees

& Funding Search),

Web content

applicants who don't enrol, i.e. end of

Permanent for historical/archiving purposes

admissions cycle + 1 year\*

(includes record of fee levels)

bursary/scholarship name,

donor details, sums

available, fee levels

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
E.3	Financial Support administered by Student Fees & Funding	Information to support the collegiate University's management of financial support schemes (including financial assistance)  This information forms part of the HESA return.	Student personal information and details of award processes, financial support provided, such as name of scheme and sum provided.  Details such as meanstested (household income) information used for allocation of scholarships and undergraduate bursaries, sensitive personal information received in financial assistance or scholarship applications, and bank details provided for payments to be made.	SITS, eVision, Access databases, Excel, emails, SharePoint/OneDrive, MS Forms	Normally end of student relationship + 6 years, with exceptions below:-  US loans • Records related to borrower's eligibility and participation—3 years from the end of the award year in which the student last attended • All other records, including any other reports or forms—3 years from the end of the award year in which the report was submitted  Financial Assistance funding (all forms) - application year +2 years (sensitive data).  Bank details collected for payments — 1 year after payment  Permanent records of student, award name and award amount required for some scholarships with lifelong relationships to support donor/alumni relations. External funding schemes (e.g. US and UK loans) - retention of anonymised records for data analysis.  Permanent in HESA files	Fees & Funding

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
E.5	Student fee status	to determine fee category	Personal data including fee status, residency and nationality information, passport, visa, immigration status	SITS & eVision, data warehouse, Excel, email	Permanent in master system i.e. SITS/eVision  Supporting material for assessments (sensitive) application year + 2 years  *records for offer holders who do not commence study should be deleted in line with the admissions policies for successful applicants who don't enrol, i.e. end of admissions cycle + 1 year*	Fees & Funding
E.6	Student Fees & Funding: Student data shared securely with Turing Scheme	Processing study abroad funding, payments, determining eligibility for additional funding for disadvantage/disability. Statistical analysis.	Student personal information and details of financial support provided, and sum provided. Sensitive personal information to determine eligibility for additional funding, and bank details provided for payments to be made.	Email, Word/Excel documents, MS Forms, SharePoint, SITS & eVision.	End of student relationship + 7 years, in line with university agreement with Turing Scheme. Separate Data Processing Agreement (DPA) document completed and maintained to detail the process for data collection, sharing with Turing Scheme.	Fees & Funding
Perso	on					
F.1	Contact details	Personal data collected to support the collegiate University's provision of support for academic, pastoral and social requirements.	email, address, telephone. Data may be shared with Oxford City Council for accommodation lists and council tax purposes.	eVision and college databases	End of student relationship + 6 years	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
F.2	Data for electoral register	Personal data collected to support the collegiate University's provision of support for academic, pastoral and social requirements.	national insurance number. Data shared with Oxford City Council with student permission.	SITS, eVision	End of student relationship + 6 years	Education Services
F.3	Data on family and friends	Personal data collected to support the collegiate University's provision of support for academic, pastoral and social requirements.	trusted contacts for emergencies details, carer responsibilities	SITS & EVision	End of student relationship + 6 years	Education Services
F.4	Disability data	Special category and personal data collected to support the collegiate University's provision of support and reasonable adjustments for academic, pastoral and social requirements.	individual's disability details, information on arrangements put in place to support student including GP letters and medical assessments, Student Support Plan and inclusive practice flags in eVision	SITS, eVision; Maximizer (CMS); SharePoint; Excel	End of student relationship + 6 years Permanent in HESA files, pseudononymised permanent record in data warehouse	Student Welfare and Support Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
F.5	Other	Personal data collected to support the collegiate University's provision of support and induction for academic, pastoral and social requirements.	names, Person IDs, nationality	SITS & eVision, data warehouse	permanent in master system i.e. SITS/eVision	Education Services
F.6	Special categories of personal data as identified in GDPR	Special category data (formerly known as sensitive personal data) collected for equality monitoring purposes and for HESA returns	ethnicity, religious belief, sexual orientation	SITS & EVision, data warehouse, HESA file, definitive dataset	End of student relationship + 6 years. Permanent in HESA files, pseudononymised permanent record in data warehouse	Education Services
F.7	Student Support	Information to support the provision of counselling and mental health, disability and harassment support to students, and for Safeguarding purposes.	Students application form, session meeting dates and notes, GP letters, email correspondence to/about the student, First Disclosures	SITS, eVision; Titanium (CMS), Maximizer (CRM). Also some paper records of First Disclosures.	End of Student relationship + 6 years	Student Welfare and Support Services
F.8	Visa and immigration: CAS data	Personal data collected to enable colleges and departments to issue CAS numbers.	passport data, visa data, citizenship, fees information and copies of passport and visa scans kept on college files.	SITS & EVision	End of student relationship + 6 years	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
F.9	Visa and Immigration: changes in student circumstances	Information collected to report to Home Office on changes in student circumstances	names, change of circumstances	SITS & EVision, Dynamics (CRM)	End of Student relationship + 6 years	Education Services
F.10	Visa and immigration: attendance checks	Data collected to confirm student attendance throughout the course on a termly basis as required by the Home Office.	names and confirmation of type of contact point met e.g. submitted work, attended compulsory lecture.	lists compiled via eVision, email and files	End of student relationship + 1 year (Home Office requirement)	Education Services
F.11	University Card photographs	Student photographs held in SITS: Vision to enable easy identification of students.	Student photographs surfaced in eVision reports for collegiate and University staff	SITS & EVision	End of student relationship + 6 years for students who enrol.  End of student relationship + 2 years for those who fail to enrol.	Education Services
Post	award					
G.1	Degree ceremony	to run degree ceremonies	names, ceremony dates, attendance	SITS & eVision, email and files	permanent in master system i.e. SITS/eVision; Also permanent in paper historical records.	Education Services
G.2	Degree Ceremony signature lists - hardcopies and annotated copies	lists of ceremony attendees, used to respond to queries	names, ceremony dates, attendance	paper files	+3 years following degree ceremony	Education Services
G.3	Degree verification	correspondence requesting and providing information to verify student award outcomes	names, course dates, results and outcomes	Online Shop, email and files, Advanced Secure	Email and files: completion of verification + 6 months Online Shop records: 7 years eDocuments service: permanent record	Education Services

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
G.4	Material to support	Material used to	names, course dates,	SITS & eVision, email	permanent in master system i.e. SITS/eVision;	departments and
	reference writing	support the writing	progress reports and on	and paper files	else:	colleges
		of academic	course information, results		End of student relationship + 6 years	
		references.	and outcomes			
		Please note:	Please note: academic		See section H (for retention of progress	
		academic progress	progress reports (e.g.		reports, milestones, skills acquisition, etc.) and	
		reports (e.g.	supervision or tutorial		section I (for retention of on course	
		supervision or	reports) and final		information)	
		tutorial reports)	examiners reports (where			
		and final examiners reports (where	these are still available)			
		these are still	should not be used for the			
		available) should	purpose of writing references without the			
		not be used for the	consent of the person in			
		purpose of writing	question.			
		references without	question.			
		the consent of the				
		person in question.				
G.5	Written references	Retaining	Written reference	email and paper files	Date of writing reference + 12 years	departments and
		previously written			,	colleges
		references will				Ü
		allow them to be				
		re-used				

1	D	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record
							Owner

H.1	Examinations: viva arrangements	Information to support the collegiate University's management of research student examinations.	examiner names, Thesis title, submission and viva details, outcomes	SITS & eVision, Degree Conferral card index, GSO paper files, Bodleian Library (thesis), data warehouse	permanent in master system i.e. SITS/eVision; else: End of student relationship + 6 years for completed students. End of student relationship + 10 years for withdrawn students.  The above applies, unless either of the following criteria are met: a) There is an outstanding complaint/investigation/claim, in which case the file should be retained and the department should consult Legal Services on when it would be appropriate to destroy it b) A complaint/investigation/claim has been concluded, but the department considers it likely that further investigations may be required. In this case the department should consult Legal Services on the best course of action	Education Services and Div Coordinators
H.2	Examinations: thesis (examiners copy)	student work to be assessed by examiners	digital and hard copy thesis	RTDS (digital copies), hard copies at Exam Schools, and with examiners.	6 months after students were notified that they are ready for collection at Exam Schools or can be posted to them at a cost.	Education Services
H.3	Examinations: thesis (Bodleian copy)	Catalogued in Bodleian library	digital and hard copy thesis	Digital and hard copies with Bodleian.	permanent copy	Bodleian

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
H.4	Milestones: assessment details	Information to support the collegiate University's management of student transfers and confirmation of status.	date of assessment, outcome	SITS & EVision, data warehouse, Degree Conferral card index, GSO paper files	permanent in master system i.e. SITS/eVision; else: End of student relationship + 6 years for completed students. End of student relationship + 10 years for withdrawn students.  Please refer to the exceptions listed in H1 above.	Education Services and Div Coordinators
H.5	Milestones: reporting	Information to support the collegiate University's management of student transfers and confirmation of status.	reports, comments on progress and skills developments	Emails and hardcopy forms	End of student relationship + 6 years for completed students. End of student relationship + 10 years for withdrawn students.  Please refer to the exceptions listed in H1 above.	Education Services and Div Coordinators
H.6	Skills training	record of skills training activities	courses, attendance dates, outcomes	Local departmental systems	Permanent in master system(s)	Student Registry and Div Coordinators
H.7	Supervision	Information to support the collegiate University's management of supervision.	supervisor name, start and end dates of supervision, % supervision	SITS & EVision, data warehouse, Teaching Management System (TMS) and GSR	permanent in master system i.e. SITS/eVision; else: End of student relationship + 6 years for completed students. End of student relationship + 10 years for withdrawn students.  Please refer to the exceptions listed in H1 above.	Education Services and Div Coordinators

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
H.8	Supervision: reports	Information to support the academic development and progress of students	Supervisor reports	GSR, local departmental and college systems	End of student relationship + 6 years for completed students. End of student relationship + 10 years for withdrawn students.  Please refer to the exceptions listed in H1 above.	Education Services and Div Coordinators
Stu	dent on course					
1.1	Accommodation	Information to support the collegiate University's management of student accommodation	start and end dates of tenancy, location of accommodation	Accommodation Office and college databases	End of student relationship + 6 years	Colleges and Graduate Accommodation office
1.2	Appeals	paperwork supporting appeals process and recording of outcomes	background paperwork and outcomes	Proctors' Office (paper and Dynamics and linked SharePoint site, Excel)	End of student relationship + 6 years	Proctors' Office
1.3	Award Outcomes	Permanent record of students' award outcomes (both individual marks and final outcomes)	Student Award outcomes	Core student record system (SITS & eVision), Degree Conferral card index, GSO paper files, results lists, data warehouse	Permanent in master system(s). Data held outside of master systems (e.g. excel, local databases) should be destroyed after use (completion of final exam brd + 2yr) see Examinations and Assessment Framework.	Education Services
1.4	College	Information on the student's college interactions	college name, collections, dining, college advisor	eVision and college databases	end of student relationship +6 years	Education Services and colleges

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
1.5	Complaints	paperwork supporting complaints process and recording of outcomes	background paperwork and outcomes	Proctors' Office (paper and Dynamics and linked SharePoint site, Excel)	End of student relationship + 6 years	Proctors' Office
1.6	Course and college details	To provide official record of student study	College, Course code and title, Start and matriculation dates, End and conferral dates	SITS & eVision, data warehouse	permanent in master system i.e. SITS/eVision	Education Services
1.7	Disciplinary	paperwork supporting disciplinary process and recording of outcomes	background paperwork and outcomes, SDP paperwork	Proctors' Office (paper and Dynamics and linked SharePoint site, Excel), Education Policy Support, Medical Sciences Divisional Office, MSTC Undergraduate Studies Office, Medical School Office.	end of student relationship + 6 years  Unless the case relates to: - sexual criminal misconduct which has not been investigated by the police, in which case permanent record - disciplinary records or fitness to practise records for medical students where a permanent record is required to be retained	Proctors' Office, Education Policy Support (SDP paperwork), Medical Sciences Divisional Office, MSTC Undergraduate Studies Office, Medical School Office.
1.8	Dispensations and appeals	Paperwork supporting the dispensations process, dispensation appeals, and appeals against Proctors/Registrar's decisions, and recording of outcomes	Application and evidence, correspondence with college/department/DAS, appeal panel paperwork	Education Policy Support, Dynamics, emails, other digital files, historic paper files.	End of student relationship + 6 years	Education Policy Support

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
1.9	General course attempt	Information about a student's course attempt, forming basis of student transcript.	Course, college, start and end dates, enrolment status, enrolment history	SITS & EVision, data warehouse	permanent in master system i.e. SITS/eVision	Education Services
1.10	On course activities: background	To provide official record of student study	Background documentation for: Registration details; Suspension, Programme transfer; Withdrawal	SITS & EVision, emails, change of circumstances forms, GSO forms - paper and e-forms.	End of student relationship + 6 years	Education Services
1.11	On course activities: outcomes	Information about a student's change of circumstances, such as programme transfer, suspension of status, withdrawal	Outcomes of Registration details; Suspension; Programme transfer; Withdrawal	SITS & EVision, data warehouse, change of circumstances forms, GSO forms - paper and e-forms.	Outcome of suspension, withdrawal, etc., permanent in master system i.e. SITS/eVision. Otherwise end of student relationship + 6 years. Data held outside of master systems (e.g. paper and e-forms) should be destroyed after use	Education Services
1.12	Teaching	Information about a student's teaching timetable	dates, times and venues of teaching activities	departmental and college.	End of student relationship + 6 years	departments and colleges
I.13	Tutorials	Information to support colleges to manage tutorials	dates of tutorials, tutor and student details	Teaching Mangement System (TMS)	End of student relationship + 6 years	Colleges

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
1.14	Virtual Learning Environment (CANVAS)	Student and course data held in CANVAS to support learning and teaching	Student number, Student name, course, interactions with CANVAS	CANVAS	SSO users (Students) will be deleted from Canvas as follows:  At the point the user's SSO has expired, the user is soft deleted, meaning the user's data will not be visible to anyone any more, but can be recovered if needed (e.g. as evidence to justify a University decision)  5 years after the soft deletion the user record is hard deleted (i.e. no longer recoverable).  Non-SSO (external) user accounts will be automatically deleted after 13 months of inactivity.  Course deletion  All Canvas courses with a Term end date (or a different specified End Date) will be automatically soft deleted 11 years thereafter. One year after the soft deletion, the course deletion will be made permanent.	Centre for Teaching & Learning

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
1.15	Educational Recordings	Educational recordings used for teaching & learning	Video recordings	Panopto	The Replay service has a default policy to automatically archive recordings after 13 months since last view. Recordings in the archive not viewed in two years will be automatically flagged and, unless a department requests the recording(s) are retained, will then be automatically actioned for archiving or deletion after a short period of time. Other recording systems in use should attempt to mirror this retention schedule so that recordings are permanently erased once they have served their purpose.  If it is necessary and justifiable to keep educational recordings beyond this schedule, then departments can request this by contacting the Replay team.  Creators of educational recordings may manually and permanently delete recordings after they are no longer available to students. If removal or deletion is required earlier than this, then a request should be made to the Replay team, supported by the Head of Department or Chair of Faculty Board.	Educational Media Services (IT Services)

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
1.16	Off venue activities	To monitor the location of students who are not studying within the University's venues	Start and end dates of off venue activity, address details whilst off venue (address, postcode, country), type of activity undertaken (study, paid work, unpaid work)	SITS/eVision, excel spreadsheets	End of student relationship +6 years for SITS/eVision or excel spreadsheets.  Permanent record retained in HESA returns	Education Services
1.17	Student surveys	To collate responses from students about satisfaction with their academic studies and social experience	Anonymised survey responses	Excel spreadsheets, Tableau	End of student relationship + 6 years	Education Services
I.18	Fitness to study cases	Paperwork supporting the fitness to study case, and recording of outcomes	Referral paperwork and (medical) evidence, correspondence with college/department/SWSS, witness statements, panel paperwork	Education Policy Support, Dynamics, emails, other digital files.	End of student relationship + 6 years	Education Policy Support
Stu	dent support					
J.1	Disability data	See F4 and F7	See F4 and F7	See F4 and F7	See F4 and F7	See F4 and F7
J.2	Harassment data	Personal data collected to support the collegiate University's provision of support. See F7	individual's details, information on arrangements put in place to support student	SITS, eVision, data warehouse	End of student relationship + 6 years	Student Welfare and Support Services and EDU

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
J.3	Sexual Harassment and Violence data	Data collected to support the collegiate University's provision of SV support. See F7	Individual's details, case notes, risk analysis, formal First Disclosures.	Maximizer and Titanium (CMS), also some paper records of First Disclosures	End of student relationship + 6 years; Formal First Disclosures indefinitely.	Student Welfare and Support Services
J.4	Sport	Personal data collected to enable OU Sport to provide memberships, facilities and sports club related services for health and performance	Title, gender, name, address, email address, telephone number, date of birth, University College/Department, OU Card number and expiry date, photo, bank account details, sports interests, health goals, training and wellness related data.	On Leisure Management system (Gladstone); in Excel. Paper forms also held unti input. Wellbeats & TeamBuildr also process data related to subscribed services.	Membership records: end of student relationship + 1 year, then Alumni relations as subscribed thereafter Blues Awards Records; indefinitely	OU Sport
Higl	her Doctorate					
K.1	Application record: Successful candidates	Information to enable panels and judges to determine application outcomes	application form, CV, publication list and covering statement, pre- screening panel reports and judge's reports	SharePoint, emails, paper files	Final application decision + 6 years	Education Services
K.2	Application record: Unsuccessful candidates	Information to enable panels to determine application outcomes	application form, CV, publication list and covering statement, pre- screening panel reports	SharePoint, emails, paper files	Final application decision + 3 years	Education Services
K.3	Outcome of award: successful candidates	Details of degree awarded	individual's details, degree awarded	SITS, eVision	Permanent record	Education Services

# University of Oxford: Guidelines on the retention of student data and records

# February 2025

ID	Sub-category	Purpose	Data Example	Where Processed	Retention Period	Retention Record Owner
K.4	Publication of award: successful candidates	Details of degree awarded	individual's details, degree awarded	University Gazette (public)	Permanent record	Education Services
K.5	Appeals against outcome	paperwork supporting appeals process and recording of outcomes	background paperwork and outcomes	Education Policy Support, Dynamics, emails, other digital files	Appeal decision + 6 years	Education Policy Support