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SECTION ON UNIVERSITY AND RESEARCH INSTITUTIONS ARCHIVES

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# GUIDELINES ON APPRAISAL AND DISPOSITION OF STUDENT RECORDS

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November 2013

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# GUIDELINES ON APPRAISAL AND DISPOSITION OF STUDENT RECORDS

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## 1. FOREWORD

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These Guidelines were produced by The International Council on Archives Section on University and Research Institutions Archives within the framework of the International Council on Archives project P2010 SUV “Appraisal and disposition of student records”.

The current version of the Guidelines was approved by the Bureau of the Section on University and Research Institutions Archives on February 14, 2013.

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## 2. DISCLAIMER

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A group of experts has 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 records. This applies especially to theories regarding to functional or content-based appraisal of records. However these Guidelines do not advocate the use of any particular method or approach.

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## 3. SCOPE

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These Guidelines are intended to be applied to the appraisal and disposition of student records, regardless of their format, created in or by any university regardless of its size, profile and legal status, or its fields of study.

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## 4. TERMS AND DEFINITIONS

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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 educational institution (university, academy, institute, college etc.);

### 5. THE CONCEPT OF STUDENT RECORD

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By “student records” we mean some or all of the information created or received by a university which documents:

- 5.1. student enrollment and academic progress towards receipt of a degree (dates of enrollment/attendance, the courses and curricula the student pursued, the results and credentials that he/she obtained);
  5. 2. student fulfillment of the academic requirements of courses (exams, reports, papers, projects, etc.) in whatever form (electronic, web-based, paper, etc.);
  5. 3. administrative processes (medical, career placement, disciplinary, financial, etc.);
  5. 4. student social life, including (but not limited to) housing, student employment at the university, involvement in student organizations, volunteer jobs, athletics, governance, extracurricular activities, social life, etc.
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### 6. POLICY

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6.1. Student records should be covered by an appraisal policy indicating the groups of documents to be destroyed at the end of retention periods 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 appropriate level of university administration.

6.2. If there is no general appraisal policy, an appraisal policy for student records should be developed and approved by the administrative office(s) of the university that has authority over student records.

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

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### 7. RESPONSIBILITY FOR THE MAINTENANCE AND DISPOSITION OF STUDENT RECORDS

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The university units or personnel responsible for keeping student records may vary according to business and legal settings and national traditions. There may be various university units responsible for maintaining student records: the office of the registrar, university archives, information technology units, and individual academic departments.

7.1. Wherever the responsibility for managing student records may lie, it should be formally documented. This documentation should detail:

- 7.1.1. the types of student records as well as the administrative university unit or officer responsible for them (this could include different units or officers for different types of student records) and

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

7.2. In order to determine the appropriate disposition actions, records need to be appraised. Responsibility for appraisal should be granted to the archivists or unit responsible for the university archives. Archivists should have the right to consult stakeholders, such as records creators, registrars, lawyers, subject area specialists and others who have expertise and interest in student records.

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

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## 8. PRACTICE OF MANAGING STUDENT RECORDS

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### 8.1. Aggregation of student records

8.1.1. In most cases, nowadays, student records are kept in both electronic and paper formats. Data kept in information systems may be born digital or copied from paper records (through scanning, optical character recognition, or data entry).

8.1.2. Related records may be assembled together in one or multiple aggregations. Aggregations may be made from:

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

– *records connected with multiple 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 in files. In an electronic environment, aggregation is ensured by a function of the 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 in records plans, disposition schedules or similar management documents. Data duplication in electronic and paper environments and/or in different university units should be indicated.

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

8.1.6. When assigning retention periods to records an assessment should be undertaken to determine the risks associated with failing to keep records as long as they are required to be kept. For example, student records may be required to prove or verify awarded

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degrees and qualifications. Failure to have evidence may lead to litigation and financial and/or reputational losses.

### 8.2. Electronic student records

Student records in electronic form have been around since the 1960s. Widespread use of electronic records started in the 1990s. Electronic records are managed by proprietary software or software built or customized by the institution.

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

8.2.2. Attention needs to be paid to the disposition of data in electronic information systems. If a system encompasses automatic deletion functionality it needs to require the approval of the archivist, system administrator or other competent specialist before any automated deletions are executed.

8.2.3. Archivists or other records specialists should be consulted regarding the contents of data to be managed by electronic information systems and their retention periods when designing or improving the systems managing electronic records. Electronic information systems need to maintain the integrity and usability of electronic records and metadata for the entire approved retention period.

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## 9. PERSONAL DATA IN STUDENT RECORDS

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9.1. In many cases student records contain sensitive data. Sensitive data in student records created nowadays include mainly data on academic performance, personally identifiable information, data on health and ethnicity, data on religious and political affiliation or opinion and data on sexual life or gender identity.

9.2. Because of the presence of personally identifiable and especially, of sensitive data, access to student records for research purposes should be allowed only after the student's death. Records about current and former students who are still living are usually accessible only with the student's permission. In some countries, access may be granted under certain conditions. Conditions may limit access only to certain categories of researchers (e.g., those of accredited research institutions, holding Ph.Ds, etc.) or fields of research (e.g. historical, demographical). If access is granted, it may be on the condition that student data is disclosed only in aggregated and summarized form and does not disclose the identities of any individuals. .

9.3. When making appraisal decisions, the presence of sensitive data or access restrictions should not, by themselves, be arguments for the destruction of records.

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## 10. APPRAISAL OF STUDENT RECORDS

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10.1. Records should be kept as long as is necessary to fulfill legal requirements and obligations and to serve the 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 university and student rights and obligations, accountability, etc. Laws may require keeping 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 the daily operations of the university. Data of prior academic performance may be required when a student resumes studies after termination or enrolls in another program after graduation. Credits obtained in studying at one institution may transfer to another institution. Student records may be kept for a certain time to be used in performance, statistical or other kinds of analysis. Student records may be maintained and augmented in order to track alumni, for promotional and fundraising purposes, etc.

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

Similar to other records, student records document the history of the university and society in general. They are valuable assets for historical, genealogical and other types of research. Universities should consider benefits arising from research of student records. They may be used for writing the university's own history, thus contributing to its identity, or in promotional campaigns, university development and advancement, etc. Moreover as a source of valuable data, student records may be a prerequisite to attracting research funding.

10.3. When appraising student records, these Guidelines first recommend:

10.3.1. To survey records for duplicate records and records with duplicate information. Leaving one original or copy and destroying duplicate copies or records with duplicate information may significantly reduce preservation costs and reduce any further need to appraise remaining records.

10.3.2. To survey records or their copies for lower-cost formats, e.g. electronic, microforms. If possible the following should be considered over complete destruction of records:

—*retaining copies or originals in lower-cost formats or*

—*transferring to lower-cost formats.*

10.3.3. However when making decisions about transferring records to lower-cost formats, all risks and costs associated with preservation and access to those records over 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 types of records should be preserved permanently:

10.4.1. Records already used for research and needed to provide verification of

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research findings.

10.4.2. Records indicating student 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 1933-1945.*

10.5.2. Records of distinguished students chosen by Appraisal committee and/ or subject area specialists, for instance: records of student records outstanding chemists or physicists chosen by science historians; student records of notable writers and poets chosen by literary scientists.

10.5.3. Records of distinguished students chosen by archivists, appraisal committee and/ or subject-area specialists, for instance:

—*records of outstanding chemists or physicists chosen by historians of science;*

—*records of notable writers and poets chosen by literary scholars.*

10.5.4. Records of students belonging to specific racial, ethnic, economic, and social groups chosen by archivists, appraisal committees and/ or subject-area specialists, for instance:

—*records of all women studying before 1950;*

10.5.5. Other records representing known research interests.

10.6. After making qualitative samples, these Guidelines recommend applying quantitative sampling. The method or methods of quantitative sampling should be chosen by archivists, appraisal committees and/or subject-area specialists. The following Guidelines may be used to choose which method to use in quantitative sampling:

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

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## 11. DISPOSAL OF STUDENT RECORDS

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11.1. Once records are appraised, those records having no archival value should be destroyed at the end of their retention period. These Guidelines also recommend the university consider offering students their own records or offering them to another institution interested in them.

11.2. Taking into account the sensitive nature of personal data in student records, those

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records 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 another institution interested in them, that institution needs to agree to comply with national legislation for data protection.

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## 12. DOCUMENTATION OF DISPOSAL

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Appropriate documentation should be made about the disposal of records. At the least, documentation should include: lists of files, aggregations, or types of records destroyed or transferred and their volume: files, boxes, bytes, etc. Documentation should be approved by the officer having authority over University records. Taking into account national or local legislation, documentation may be required in order to secure approval from national or regional archival institutions for destroying or transferring records.



### APPENDIX. LIST OF STANDARDS AND LITERATURE

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- 1 DLM Forum Foundation, MoReq2010: Modular Requirements for Records Systems- Volume1: Core Services and Plug- in Modules, 2011: Part 1
- 2 Hull, Felix. The use of sampling techniques in the retention of records: a RAMP study with guidelines. Paris: UNESCO, 1981.
- 3 ISO 15489-1 Information and documentation- Records Management- Part 1: General;
- 4 Maher, W. The Management of College and University Archives, Scarecrow Press and Society of American Archivists, 1992.
- 5 Samuels, Helen W. Varsity letters: documenting modern colleges and universities. Boston: Scarecrow Press, 1992.