| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|---|---|--|-------------------|--|---------------------------|--|
| Student Systems | | | | | | |
| Student name, title, gender | To identify you as an individual when at or interacting with the University | Student Systems | In perpetuity | Archive | Completion of studies | Student data is held in perpetuity to verify the degrees awarded by the University |
| Student photographs | To identify you as an individual when at or interacting with the University | Card Services | 2 years | Destroy | Completion of studies | Photos are destroyed when on campus identification is no longer necessary |
| Student term time contact details | To enable contact when required | Student Systems | Duration of study | Ownership transferred | Completion of studies | D&A become owners of this data post student completion |
| Alumni contact details | To enable contact when required | Development and Alumni (D&A) | In perpetuity | Actively maintained for life long relationship | n/a | Alumni can opt out and request their contact data be deleted |
| Alumni information | To confirm your identity when required and used to contact you after graduation | D&A | In perpetuity | Archive | n/a | Alumni will always be identifiable for the purpose of verifying the degrees awarded by the University |
| Records regarding programme of study, mode of study, method of study, course enrolments, periods of matriculation and absence | 9 | Student Systems and Schools (course work) | 10 years | Destroy | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |
| Course work | To deliver teaching and assess students | Schools | 10 years | Destroy | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |

| Record | Activity | Owner of the "golden | Retention period | Disposition | Start of retention | Explanation of retention |
|---|--|--|-------------------------------|-------------|-----------------------|--|
| | | сору" | | | period | period |
| Higher Education Achievement Report (HEAR) | To provide a single comprehensive record of students' achievements; this includes course marks, awards and prizes, awarded degrees and classifications | Student Systems | In perpetuity | Archive | n/a | This is European standard for sharing student course marks and awards, replacing the 'student transcript' and will be held as a record of student achievement, and is required to demonstrate the validity of the Universities award degrees |
| Student representation | To facilitate communication between Student Representatives and the students they represent and to be invited to take part in voluntary and paid opportunities to support student recruitment and widening participation | School, course organiser | Defined per specific activity | Archive | n/a | As students volunteer to represent the University, they must be made aware of the data protection arrangements of that activity |
| Concessions | To enable concessions to be permitted against various University regulations to an individual student's benefit | Extensions and Special Circumstances, School/College | 1 year | Destroy | Completion of studies | Once a concession has been agreed and authorised, any supporting evidence can be destroyed |
| Personal tutor notes | To support students throughout their time at the University, provide academic support | School | 5 years | Destroy | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|--|---|----------------------------|------------------|-------------|---------------------------|--|
| PG Research review records | To annually review progress of postgraduate research students | School | 7 years | Destroy | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |
| Graduation schedule | Registering for graduation | Student Systems | 1 year | Destroy | Completion of studies | Once graduation ceremony has passed all data is no longer required and can be destroyed |
| Graduation publications | To record and publish graduation information | Student Systems | In perpetuity | Archive | n/a | Students are given opportunities to opt out when the list of graduands is shared externally for publication |
| Timetabling | To timetable classes and exams | Student Systems | 1 year | Destroy | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |
| Academic progress record including formal action to deal with unsatisfactory progress, transfer to new programmes or to new courses within programmes, withdrawal from the institution, and the termination of individual students' programmes | To administer student progress | Schools | 6 years | Destroy | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |
| Library information | To allow students to make use of the library services | Library | 2 years | Destroy | Completion of studies | |

| Record | Activity | Owner of the "golden | Retention period | Disposition | Start of retention | Explanation of retention |
|--|---|--|--|-------------|-----------------------|--|
| | | copy" | | | period | period |
| Virtual learning information | To allow staff and students to interact in support of their studies by providing a communications forums, document sharing and submitting assessments | Schools | Live data from student record; data not locally retained | n/a | Completion of studies | After retention period with no contact from student, the record is reduced and core record is archived, all supporting data now without value is destroyed as part of this process |
| Immigration information | To provide Tier 4 visa sponsorship to remain in the UK | Student Systems (Immigration service) | 10 years for students, 1 year for unsuccessful applicants | Destroy | Completion of studies | Legal requirement |
| Fee records | To determine and process fee status | Student Systems (Immigration service) | 7 years | Destroy | Completion of studies | Legal requirement |
| Student funding records | | Student Systems (Student Funding team) | Successful applications - 7 years, unsuccessful applications – 1 year | Destroy | Completion of studies | Legal requirement |
| Scholarship applications and resulting documents | To process and manage scholarships | Student Systems (Scholarships service) | Successful applications - 7 years, unsuccessful applications – 1 year | Destroy | Completion of studies | Legal requirement |
| D&A | | | _ | | | |
| Register of General Council members | A list of graduate members, and current staff and University court members | D&A | In perpetuity | n/a | Creation of record | Universities (Scotland) Act 1966 |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|---|---|--|-------------------|-------------|---------------------------|---|
| Alumni records | A list of University of Edinburgh alumni and associated information | D&A | In perpetuity | n/a | Creation of record | Allows alumni to access services to which they are entitled to use; provide alumni with relevant and timely information; needed for historical reporting purposes |
| Donor records | A list of University of Edinburgh donors and associated information | D&A | In perpetuity | n/a | Creation of record | Provide donors with relevant and timely information; needed for historical reporting purposes |
| Potential and current supporters and other individuals and stakeholders | A list of individuals, stakeholders, current and potential supporters relevant to the University and associated information | D&A | In perpetuity | n/a | Creation of record | Provide individuals with relevant and timely information; needed for historical reporting purposes |
| Wealth assessment of donors and potential supporters | Classification of overall wealth and capacity and likelihood to support the University | D&A | 5 years | Destroy | Creation of record | Needed so requests for support are appropriate and relevant and resources are used effectively |
| Due diligence assessment | Risk assessment of accepting donations on behalf of the University | D&A | In perpetuity | n/a | Creation of record | Needed for historical reporting purposes |
| Event attendees | Record of dietary or accessibility requirements when attending an event | D&A | Duration of event | Destroy | Event completion date | n/a |
| Academic Services | | | | | | |
| | Student academic appeals | | | | | |
| All records generated by appeal process | Student academic appeals: cases | Associate Dean (College Office), Academic Services | 5 years | Destroy | | Allows time to resolve any issues or queries |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|--|--|--|------------------|-------------|---------------------------|---|
| | Student conduct cases | СОРУ | | | periou | periou |
| All case and appeal records | Administration relating to conduct and academic misconduct cases | Schools, Colleges and Academic Services | 5 years | Destroy | | |
| Correspondence, evidence, notes of meetings, record of outcome of cases | Administration relating to conduct cases dealt with by Centre for Sport and Exercise | Centre for Sport and Exercise | 1 year | Destroy | | |
| Correspondence, evidence, notes of meetings, record of outcome of cases | Administration relating to conduct cases dealt with by Accommodation, Catering and Events | Accommodation, Catering and Events | 1 year | Destroy | | May have a bearing on later years of study; retention for 1 year after graduation allows time to resolve any issues and queries |
| All case records where the student is permanently excluded from the University | Administration relating to conduct cases that go to the Student Discipline Committee whereby the student is immediately permanently excluded from the University with no eligibility for re-admittance to the University on any course or degree programme | Academic Services | In perpetuity | Retain | | Retain as the student is not eligible for re-admittance to the University on any course or degree programme |
| Record of i) date of disclosure and ii) the nature of the charge or conviction and iii) that a decision was taken not to investigate under the Code of Student Conduct | Administering a disclosure from a student relating to a criminal charge or conviction which the University decides does not represent a breach of the Code of Student Conduct | | 5 years | Destroy | | |
| | Student complaints | | | | | |
| All relevant records | Informal and formal complaints | Relevant member of staff or investigation lead | 5 years | Destroy | | Allows time to resolve any issues or queries |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|---|---|---|---------------------------|-------------|--|--|
| Minutes and papers of Special Circumstances Committee | Special circumstances | Secretary to the relevant Special Circumstances Committee | 5 years | Destroy | Ferres | Can be useful for precedent purposes |
| Student Accommodation | | | | | | |
| Electronic queries from prospective tenants, and replies | Email and live chat enquiries | Accommodation, Catering and Events | 1 year | Destroy | After creation | Allows time for follow up queries or to resolve queries or issues |
| Online application form | Application for accommodation | Accommodation, Catering and Events | 3 years + current year | Destroy | After receipt | Allows time to resolve queries or issues |
| Accommodation contract offered and accepted | Accommodation Offer/Acceptance | Accommodation, Catering and Events | 1 year | Destroy | After receipt | Allows time to resolve any follow up queries |
| Medical or disability information from student | Medical appeal for specific accommodation | Accommodation, Catering and Events | 1 year post graduation | Destroy | After student moves out of accommodation | Allows time to resolve queries or issues |
| Bank Introductory Letter | Bank Introduction Letter | Accommodation, Catering and Events | 3 years + current year | Destroy | Completion of studies | |
| Communication to student | Student Communication | Accommodation, Catering and Events | 3 years + current year | Destroy | After creation | Allows time for follow up queries or to resolve queries or issues |
| All records relating to the appeal, including notice of appeal, outcome letter and committee minutes | Administering allocation appeals | Accommodation, Catering and Events | 6 months | Destroy | After conclusion of appeal | Allows time to resolve queries or issues |
| Electronic Transfer request | Administer transfer requests | Accommodation, Catering and Events | 3 years + current year | Destroy | After student moves out of accommodation | Allows time to resolve queries or issues |
| Withdrawal request from student | Student withdrawal from University | Accommodation, Catering and Events | 1 year | Destroy | After student moves out of accommodation | Allows time to resolve queries or issues |
| All incidents recorded electronically on incident tracker by the Community Support Team (emailed reports by the Central security team are sometimes received) these are also recorded on incident tracker | Recording security incidents | Community Support Team | 2 years + current year | Delete | Start of new financial year | Allows time to resolve queries or issues and statistical reporting |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|---|--------------------------------------|---------------------------------------|---|-------------|--|---|
| Report investigating is carried out by the Community Support Managers, in conjunction with Residence Life Team and Central Security Team | Investigating security incidents | Community Support Team | 2 years + current year | Delete | Start of new financial year | Allows time to resolve queries or issues and statistical reporting |
| Electronic application to stay in ACE accommodation. | PG Accommodation Renewal Request | Accommodation, Catering and Events | 3 years + current year | Destroy | After creation | Allows time for follow up queries or to resolve queries or issues |
| Application to enable UG students to stay in current accommodation | UG Accommodation Renewal Requests | Accommodation, Catering and Events | 3 years + current year | Destroy | After creation | Allows time for follow up queries or to resolve queries or issues |
| Careers support | | | | | | |
| All records related to careers advice and guidance counselling | Careers advice | Careers Service | Students: duration of study Graduates: 5 years after leaving the University | Destroy | At end of academic year following the last contact | Allows some time for contact to be revived |
| Registration form for individual workshops | Careers workshops | Careers Service | Students: duration of study Graduates: 5 years after leaving the University | Destroy | At end of session | No longer needed |
| Student request for a reference and letter of reference | Giving references | Relevant staff member | 6 months | Destroy | After creation | Allows time for follow up requests. After 5 years a reference is unlikely to be still relevant |
| Student Counselling and Disability Support | | | | | | |
| , | Disability support | | | | | |

| Record | I | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|---|------------------------------------|----------------------------|------------------|-----------------|---------------------------|---------------------------------|
| All records relating to organisation of | | The creator of the | 5 years after | Destroy | After graduation, | Allows time to resolve |
| disability support for students | individual students | record | graduation | | withdrawal or other | queries or issues |
| ,, | | | | | permanent departure | 4 |
| | | | | | from University, or, in | |
| | | | | | the case of lapsed | |
| | | | | | students, 4 years after | |
| | | | | | last contact | |
| | Counselling students | | | | | |
| All records relating to counselling | Counselling students | Counselling Services | 5 years | | After creation | Required by professional |
| students | | | | | | counselling body |
| | Providing informal pastoral care | | | | | |
| Pastoral-themed correspondence | Providing informal pastoral care | Relevant staff member | 1 year | Destroy | After graduation, | Allows time to resolve |
| between students and Director of | | | | | withdrawal or other | queries or issues. For Centre |
| Studies/supervisors/lecturers/tutors/co | | | | | permanent departure | for Open Learning, allow one |
| urse organisers/Accommodation | | | | | from University, or, in | year more than maximum |
| offices/Centre for Open Learning | | | | | the case of lapsed | time available to student to |
| student advisers/potentially any staff- | | | | | students, 4 years after | complete certificate |
| member anywhere in the University | | | | | last contact | |
| Letter concerning student's bona fides | Vouching for student's bona fides, | See creator of record | 1 year | Destroy | After creation | Allows time to resolve any |
| | e.g. visa application, council tax | | | | | issues or queries |
| | certificates, matriculation | | | | | |
| | certificates, banks | | | | | |
| Information Services | | | | | | |
| | | | | | | |
| Card Services and Apps | University, and database | Hair and Canal | Dantan | 45 | After and deather | LIV Company Data Bustontian |
| Administering University card | University card database | University Card | Destroy | 15 months after | After graduation, | UK General Data Protection |
| | | Services | | card expires | withdrawal or other | Regulation (GDPR) |
| | | | | | permanent departure | |
| Allocation constluencient arout | Francis detales a /agree delecat | Alumani Caminas | Destus | 20 | from University. | Nataranadad |
| Allocating small project grant | ' ' | Alumni Services | Destroy | 20 years | After decision taken | No longer needed |
| | recording whether received a | | | | | |
| | grant or was declined | | | | | |
| ICT security | | | | | | |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|--|---|-------------------------------|------------------|-------------|---|---|
| Creating user names, login passwords and e-mail accounts | 1 ' ' ' ' ' ' | IT Infrastructure Division | Destroy | 1 year | After receipt | Allows time to resolve queries or issues |
| Creating user names, login passwords and e-mail accounts | Auditable log of activity within the Identity Management Service | IT Infrastructure Division | Destroy | 1 year | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |
| Creating user names, login passwords and e-mail accounts | Entry in student database recording personal e-mail address | Student Systems | Destroy | 1 year | After graduation, withdrawal or other permanent departure from University, or, in the case of lapsed students, 3 years after last contact | Allows time to resolve queries or issues |
| Providing ICT services across networks | Audit and exception files produced during network and email use (these include matriculation number but not names or other details) | IT Infrastructure Division | Destroy | 1 year | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |
| Providing ICT services across networks | History files produced during network and e-mail use (these include names) | IT Infrastructure Division | Destroy | 1 year | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |
| Providing ICT services across networks | Usage reports | IT Infrastructure Division | Destroy | 4 years | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |
| Providing ICT services across networks | Network traffic logs (usually do not have student identity with the exception of the dial-up, wireless, and VPN Gateway log which records in student logs in for out) | IT Infrastructure Division | Destroy | 6 months | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |
| Maintaining network security | Report of network traffic information | IT Infrastructure Division | Destroy | 6 months | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |

| Record | Activity | Owner of the "golden copy" | Retention period | Disposition | Start of retention period | Explanation of retention period |
|---|---|--|------------------|-------------|---|---|
| Maintaining network security | IT security problem report (private area of the Call Management System) | IT Infrastructure Division | Destroy | 2 years | After creation | No longer needed |
| Maintaining network security | Security analysis report | IT Infrastructure Division | Destroy | 5 years | After creation | No longer needed |
| Maintaining network security | Database recording equipment which regularly causes difficulty on the network, recording details of users | IT Infrastructure Division: Science Support Team | Destroy | 1 year | After last incident | |
| Withdrawing login and email access | E-mail still in account after grace period has elapsed (150 days) | IT Infrastructure Division | Destroy | | At end of grace period | Data Protection Act 2018 (DPA 2018)/UK GDPR |
| Withdrawing login and email access | User ID, email account ID, shared secrets and e-mail directory | IT Infrastructure Division | Destroy | 6 months | After account withdrawn | DPA 2018/UK GDPR |
| Providing alumni portal | Form from the alumni asking to register for this service | D&A | Destroy | 6 months | After account set up | Allows time to resolve queries or issues |
| Providing alumni portal | History files produced during messaging service use (these include names and "full detail records.") | D&A | Destroy | 6 months | After creation | Based on Home Office Voluntary Code of Practice on Data Retention |
| ICT User Support | | | | | | |
| Preparing the user support system (IT Infrastructure Division Call Management System) | Named entry in Call Management System with e-mail address and preferred method of contact: no calls logged | IT User Services Division | Destroy | 6 months | After graduation, withdrawal or other permanent departure from University, or, in the case of lapsed students, 3 years after last contact | No longer needed |
| Providing user support | Entries in Call Management System giving details of student, call and support provided | IT User Services Division | Destroy | 2 years | After call logged | Allows time to resolve queries or issues |
| Delivering library services | | | | | | |

| Record | Activity | Owner of the "golden | Retention period | Disposition | Start of retention | Explanation of retention |
|------------------------------|--------------------------------------|----------------------|------------------|----------------------|--------------------------|-----------------------------|
| | | сору" | | | period | period |
| Registering students | Patron record | Main Library | Destroy | 1 year after | After graduation, | Allows time to resolve |
| | | | | graduation | withdrawal or other | queries or issues |
| | | | | | permanent departure | |
| | | | | | from University, or, in | |
| | | | | | the case of lapsed | |
| | | | | | students, 3 years after | |
| | | | | | last contact | |
| Delivering library services | An archive of the daily data runs | Main Library | Destroy | 7 years | After creation | Information may be needed |
| | that produce library notices to be | | | | | for debt recovery |
| | sent to patron, holding individual | | | | | |
| | information about student | | | | | |
| | transactions | | | | | |
| LTW | | | | | | |
| Mandatory Training reporting | A report detailing completion of | Information Security | Destroy | 1 year after leaving | Information currently | Allows time for users to be |
| | mandatory training modules | | | university | set to drop off after 1 | removed from AD, which is |
| | Information Security Essentials | | | | year, with high level | used to populate the data |
| | and Data Protection Training. This | | | | reports (non PII) pulled | |
| | specifically relates to handling and | | | | and archived separately | |
| | processing of this information | | | | | |
| | after it is pulled from LEARN. | | | | | |
| | | | | | | |