

Policy on the Retention of Alumni Data and Records

1. Purpose

- 1.1 This policy defines the principles, time periods, mechanisms and responsibilities for the University's retention of alumni personal data.

2 Definition and scope of alumni personal data and records

- 2.1 'Alumni' in the context of this policy and the records and data held by the University are defined as any individual who has achieved an Open University qualification, including those who have opted in to alumni status on completion of an OU validated qualification.
- 2.2 Student data will be added to alumni record systems on completion of qualification. Alumni contact details continue to be held and mastered in student record systems to ensure a single instance of accurate information.
- 2.3 This policy covers all alumni data, information, records and content relating to university business which has been created by university staff or updated directly by individual alumni, and
- 2.3.1 relates to an identifiable individual (eg: identified by name, PI and/or contact details)
 - 2.3.2 is kept in any medium or format (eg: text, sound, image, paper, electronic, document or database)
- 2.4 Generally, alumni records will relate to the management of the relationship between the OU and its alumni, for example:
- 2.4.1 records documenting agreement to receive marketing mailings, etc, and mailings to cohorts of alumni
 - 2.4.2 transcript records documenting the modules and qualifications completed
 - 2.4.3 individual alumni contact records, e.g. update of details, queries, correspondence relating to donations and bequests.
- 2.5 This policy does not cover data being held on individuals who are not 'alumni' (as defined in section 2.1) but who have been approached by the Development Office as prospective donors to the University. Data on these individuals is held in the same systems as alumni data.

3 Legislative and regulatory framework

- 3.1 The Data Protection Act 1998 requires that alumni records should only be retained for as long as is necessary.
- 3.2 The Data Protection Act 1998 also requires that personal data should be accurate and up-to-date. Alumni are requested to update their personal details twice-yearly.

4 Principles for the management and retention of personal data

- 4.1 The timeframe for retaining personal data must be in line with legislative and regulatory requirements (see section 3) and must meet business requirements. However, the choice of retention timeframes should be kept to a minimum in order to simplify the task of managing large stores of data.

4.2 Long term records – indefinite retention

Alumni are requested to update their personal details twice-yearly. In order for the alumni office to carry out their business functions of keeping alumni up to date with University activities and pursuing donation prospects, it requires alumni contact details and contact history (e.g. donations made) to be held indefinitely. Deceased alumni are marked on the records system so no mailings are sent.

4.3 Legal, contractual and regulatory requirements (6 years)

There is a legal/contractual requirement to keep records and data relating to payments for services, e.g. alumni events, for 6 years after the activity/ transaction has been completed.

4.4 Operational records (up to 3 years)

Data relating to alumni as users of services or day to day administration eg: correspondence, queries, where the detailed information is not required for contact history (see 4.2). This includes information alumni provide which has time-limited use.

- 4.5 Sharing data with third parties: Personal data owned by the university may, on occasion, be shared with third parties. The third party will be acting as our agent on the basis of university instructions (eg: market research agencies), and the university remains the data controller. The third party must be contracted to adhere to the university's student data retention and security policies, as well as the UK Data Protection Act 1998 or equivalent legislation. In relation to research projects eg: those undertaken by market research agencies the contract would usually require them to destroy the data immediately after project completion.

- 4.6 Due to the constraints of some of the databases and repositories containing student data, other pragmatic events or time periods may be used to ensure that the destruction of data occurs within a reasonable time of the retention period stated for the data/activity type. For example, DIP records will need to be deleted within a fixed period of time from the date they have been scanned.

- 4.7 It is good information management practice to destroy information when it becomes redundant. This ensures that retrieving current information is more efficient, and that redundant information is not retrieved in error because it still exists. Data retention

periods should be set taking JISC recommendations of good practice into account, as well as legal and regulatory requirements.

- 4.8 The retention periods for alumni data and records are incorporated in the university Retention Schedule.

5 Roles and responsibilities

- 5.1 The University Secretary is the Information Owner for the university.
- 5.2 The Director of Development is the university officer responsible for alumni data and records within the university.
- 5.3 The University Records Manager provides tools, advice and guidance to ensure that university records are maintained according to legislation and best practice.

6 Maintenance of policy

- 6.1 The Policy, and compliance with the policy, will be reviewed every 3 years at the instigation of the Director, Students, in line with the student data and records retention policy. There will be an annual review to ascertain if amendments to the Retention Schedule or policy are required due to changing legislation or business requirements.
- 6.2 The Director, Students (or nominee) may at any time request individual stakeholders to submit a report on their compliance with this policy, in line with the maintenance of the student data and records retention policy.
- 6.3 The Retention Schedule is updated on a rolling basis by the Records Manager, aiming to review all entries within 5 years of the last update. Each amended entry relating to student data will be approved by the Director, Students, or his/her nominee.
- 6.4 Revisions to the Retention Schedule or queries in interpreting this policy should be directed in the first instance to the Records Manager. Issues relating to legal non-compliance must be forwarded to Senior Manager, Information Compliance.
- 6.5 All alumni data and records require a robust business reason for them to be kept. If a business reason for the retention of data cannot be articulated, then it should be destroyed. The case must include evidence of the frequency with which this data is referred to over time; and an analysis of the financial or other risk of not being able to refer to the data.

7 Related policies

- Data protection policy
www.open.ac.uk/students/charter/essential-documents/a-to-z
- Freedom of information code of practice
www.open.ac.uk/students/charter/essential-documents/a-to-z