VLE Content Management, Retention and Disposal

This document sets out the principles and requirements for VLE content management in line with the University Records Management Policy.

The virtual learning environment exists to support teaching, learning and the student experience, not collaboration and content management in general. Courses refer to all spaces within the VLE used to support all types of teaching and learning activities.

Principles

- Courses should be preserved as an academic record once they are completed.
- Students should have access to their courses for the duration of their studies so they can refer back to course content and feedback provided by markers.
- The virtual learning environment is and contains University Information Assets that are recorded in an information asset register and classified according to University information security and records management policies.
- In perpetuity is a bad idea, particularly for data processing accountability, so no service is provided that isn't time bound.
- Information Assets can contain personally identifiable data. Data Protection laws dictate that personal data should not be held for *longer than necessary*
- Personal data held longer than necessary can increase the risks posed by information security breaches due to increasing the volume of data that is potentially affected.

The accountability principle of the GDPR requires us to demonstrate we are compliant with data protection laws. Documented and clearly defined record retention and disposal schedules are one way in which this requirement can be met.

Requirements

At all times assets within the VLE are accessible to authorised university data trustees, stewards, custodians and record managers as needed to fulfil their roles and responsibilities.

Academic Course Information Assets

There is an asset lifecycle for information assets related to courses that is based on academic sessions.
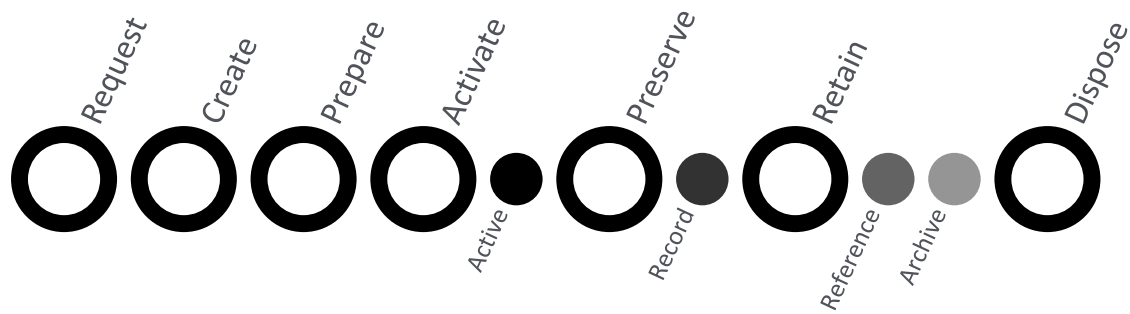
Courses are created in advance of each academic session and made available to module convenors for preparation.

Module convenors can decide whether to start each new course with an empty shell or with a copy of the content from another course.

Course information assets are activated when they are made available to enrolled students.

Courses and related assets are preserved as course records at the end of the academic session in which their delivery concludes. At this point courses can remain available to participants for reference but no further changes to content or structure should be made.

Course records are retained in accordance with the following formula:

The standard formula is 5 years (OfS) + 1 year (buffer).

Checks are made for active students, and the standard formula of 5+1 is only applied when there are no more active students.

It is important to understand what 'active' means in the context of a course we are planning to delete.

In SITS the student will have an end-date set on a per course basis. In order to identify when the course itself can be deleted, all students on that course should have an 'end-date' recorded on SITS for that particular course +5 years (OfS)+1 year (buffer). A student could register for a new course in SITS and still be active on that one (i.e. end-date not reached) but it should still be possible to delete those courses where they have an end-date recorded + 6 years.

Examples given below.

Retention of VLE courses - examples

Course name	Course ended	Total number of students enrolled	Student accounts active on RISIS as of course end date		Student accounts active on RISIS post 1 year		Student accounts active on RISIS post 2 year		Student accounts not active on RISIS post 3 year		Add 5 years based on OFS	Add 1 year buffer	Course deletion
	year	Students	Year	Students	Year	Students	Year	Students	Year	Students	Year	Year	August
BA XXX	2017	150	2017	0	NA	NA	NA	NA	NA	NA	2022	2023	2023
BA Education	2017	150	2017	20	2018	5	2019	3	2020	0	2025	2026	2026
BA Business	2016	300	2016	30	2017	15	2018	5	2019	0	2024	2025	2025
MA Education	2019	100	2019	20	2020	10	2021	0	NA	NA	2026	2027	2027
BSC Psychology	2020	167	2020	0	NA	NA	NA	NA	NA	NA	2025	2026	2026

The first example in this table represents a majority of courses where all students finish on the expected date. The other examples then represent situations where for any reason student may continue to be active on a course after the course has ended.

For the first four years of the retention period, course records are held as a reference copy so they can be directly viewable by those who had a role in the active course. For the final 2 years of retention the courses are held in a diabled mode and can only be accessed if a request is submitted to DTS to reinstate the course,

At the end of the retention period course records are removed entirely from any containing system and are securely destroyed.

Course Information Assets stored outside the VLE

Although some information assets related to courses are stored outside the VLE, where possible the same retention policy will apply.

Out of scope assets

The following is a list of out of scope assets that are shared through the VLE via integrated systems that have their own retention schedules or policies:

- Turnitin
- Matlab Grader
- M365 Teams used for teaching and learning.
- Any recordings created or hosted using third party platforms other than YuJa, Collaborate or Stream

Recorded Content

Recorded content will follow the 'Recorded Content Retention Schedule' and this will include recordings made using:

- Yuja
- Collaborate

NOTE: Any recordings uploaded directly into Blackboard will be retained according to the course information assets above.

Portfolios

Blackboard Portfolios produced in response to the academic requirements of a Programme or Module are considered to be Course Information Assets and have the same retention period as Courses. Other portfolios are considered to form part of the user's personal assets, and are subject to the same retention period.

Organisation Information Assets

Blackboard Organisations are used for supporting student learning that goes beyond a particular RISIS module or programme cohort. They complement standard taught modules and offer a space where Schools and support departments can provide student-focussed resources, support and communication channels.

There is an asset lifecycle for information assets related to organisation spaces that is based on subscription periods.
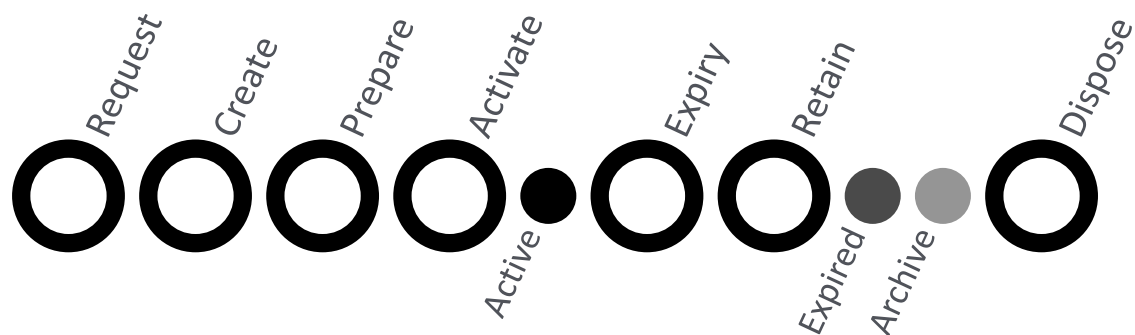
All organisations are time bound and are provided for a 2 year subscription term in response to a legitimate request.

All organisations must have a nominated owner and administrator , who are current employees.

Organisation information assets are activated when they are made available to enrolled participants.

Organisations expire at the end of their 2 year subscription term, unless renewed. Upon renewal Organisations will remain active for an additional 2 years as which point another request can be made to continue to renew the Organisation again for a further 2 years.

After expiration organisations become inactive and inaccessible and are retained for 1 year (the archive period).

A renewal request can be made at any point during the archive period to reactivate the organisation for a further subscription term.

At the end of the archive period organisation assets are removed entirely from any containing system and are securely destroyed.

Requests for organisation spaces may be refused if not related to teaching & learning or the student experience. Request may also be refused if an alternate digital platform is more suitable for meeting the requirement.

User Information Assets

There is an asset lifecycle for information assets related to user accounts that is based on the identity lifecycle. User accounts refer to both student and staff accounts and include all assigned roles within the VLE.

A user account may be disabled in identity management systems before the user is deactivated in the VLE.

User content is any content, including practice/training courses created for individual use, within the VLE that is associated with a specific user account and that that is not referenced by an academic course or a portfolio.

Where user content is referenced by an academic course or a portfolio then the academic course or portfolio schedule applies.

User content will be retained for six years after the user leaves the University.

Institution Content

Institutional content will be reviewed on an ad hoc basis. Any content that is no longer required or linked to will be deleted.

Other Information Assets

System monitoring information and operational backups are managed by the hosting service according to their policies and our operating agreements.

Anonymised statistical and reporting information is retained indefinitely for bench marking.

All customer and unique system data is backed up at least once a day to at least two discrete physical locations using highly durable storage. Backups are maintained for at least 30 days. (information taken from Blackboard help page: Operations (blackboard.com))

Disposal Schedule

Class of Assets	Retention/Review Period	Rationale
Academic Course Content *Any VLE information asset associated with an academic course.*	Retain for 6 years after the academic session in which their delivery concluded and no active students are currently enrolled on the course	Students should have access to course material, and feedback on assessment, for the duration of their programme. Retain long enough to answer any academic queries or disputes after enrolment. This also meets OFS requirements of retaining assessed work 5 years after the completion of the course.
Portfolio – for a specific course *Any VLE information asset associated with an academic course space and a portfolio.*	Retain for 6 years after the academic session in which that course delivery concluded and no active students are currently enrolled on the course	Retain long enough to answer any academic queries or disputes after enrolment. This also meets OFS requirements of retaining assessed work 5 years after the completion of the course.

Portfolio - personal *Any VLE information asset associated with a personal portfolio.*	Retain for 6 year after the academic session in which the user account is deactivated in the VLE.	Align with course retention policies.
Organisation Space Content *Any VLE information asset associated with an organisation space.*	Delete 1 year after subscription expiry.	Some organisational space user is periodic so retain long enough after subscription expiry to confirm organisation is no longer required.
User Content *Any VLE information asset associated with an individual user that is not also associated with an academic course or portfolio space. Includes but is not limited to personal content and individual practice courses.*	Retain for 6 years after the academic session in which that course delivery concluded and no active students are currently enrolled on the course	Align with user account retention policies.
System Monitoring Information *Any VLE information asset associated with system administrators and/or used to operate the service.*	As per policies and operating agreements of hosting service.	Align with service operation policies. Retain data as needed for operating the system. In principle there is little operational need for such information beyond 6-12 months.
Anonymised Statistical and Reporting Information *Any VLE information asset that does not contain personally identifiable information that is used for analysis or reporting.*	Can be retained indefinitely.	For benchmarking and longitudinal analysis.
System Point in Time Copies (Snapshots)	A snapshot is taken every month and retained for 30 days	For recovery and rollback.

Version control

VERSION	KEEPER	REVIEWED	APPROVED BY	APPROVAL DATE
1.4	DTS/CQSD	23/04/2024	Data Protection Officer	09/05/2024
1.3 – Draft	DTS/CQSD			
1.2 - Final	DTS/CQSD	16/06/2021	Data Protection Officer	21/06/2021
1.1	IT/CQSD	04/06/2018	UoR Policy Group	05/09/2018
1.0 – Final	IT / CQSD TEL	13/06/2018	UoR Policy Group	04/09/2018
1.0 – Draft 1	IT / CQSD TEL	13/06/2018	Project Team	13/06/2018

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