

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.

Principles

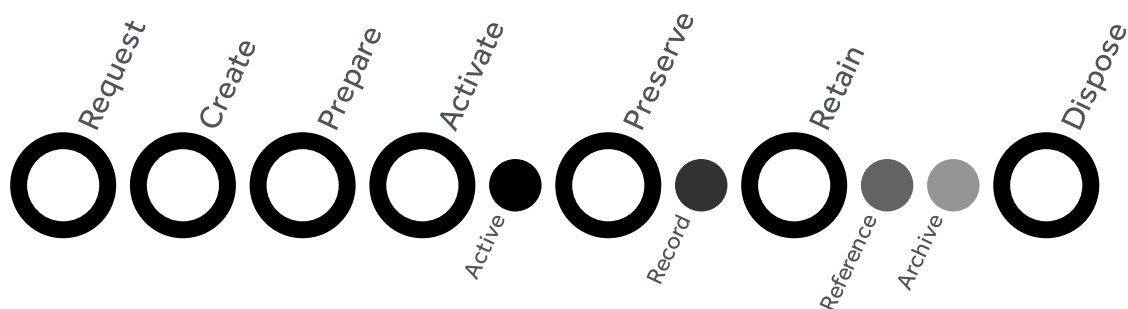
- The virtual learning environment exists to support teaching, learning and the student experience, not collaboration and content management in general.
- Courses should be preserved as an academic record once they are completed.
- Students should have access to their courses for the duration of their 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 course spaces that is based on academic sessions.



Course spaces 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 space with an empty shell or with a copy of the content from another course space.

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

Course spaces 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 for seven years after the academic session in which their delivery concludes (1+7 principle).

For the first three 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 remaining four years of the retention period, course records are held in dark storage as an archive copy.

Access to a retained copy can be provided in response to a legitimate query concerning course records.

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

Portfolios

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

Organisation Information Assets

There is an asset lifecycle for information assets related to organisation spaces that is based on subscription periods.



All organisations should be time bound and are provided for an agreed subscription term in response to a legitimate request.

All organisations must have a nominated owner, who is a current employee.

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

Organisations expire at the end of their subscription term, unless renewed.

After expiration organisations become inactive and inaccessible and are retained for 2 years.

A renewal request can be made at any point during the retention period at access to the organisation space can be restored for a further subscription term.

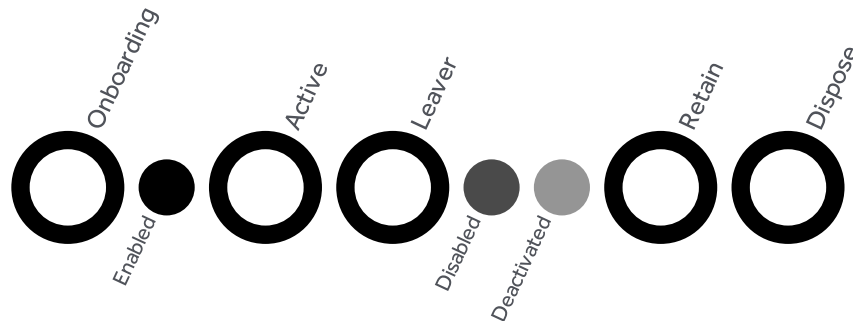
At the end of the retention period organisation assets are removed entirely from any containing system and are securely destroyed.

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.

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 seven years after the user leaves the University.

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.

Snapshots (system point in time copies of the system or any part for development, quality assurance or service transition) are reviewed after one year or upon the conclusion of any commissioning project or work initiative, whichever is earlier and can be retained for a maximum of three years.

Disposal Schedule

Class of Assets	Retention/Review Period	Rationale
<p>Academic Course Content</p> <p><i>Any VLE information asset associated with an academic course space.</i></p>	Retain for 7 years after the academic session in which their delivery concludes	<p>Students should have access to course material, and feedback on assessment, for the duration of their programme.</p> <p>Retain long enough to answer any academic queries or disputes after enrolment.</p>
<p>Portfolio – for a specific course</p> <p><i>Any VLE information asset associated with an academic course space and a portfolio.</i></p>	Retain for 7 years after the academic session in which that course delivery concluded.	Retain long enough to answer any academic queries or disputes after enrolment.
<p>Portfolio - personal</p> <p><i>Any VLE information asset associated with a personal portfolio.</i></p>	Retain for 1 year after the academic session in which the user account is deactivated in the VLE.	Align with course retention policies.
<p>Organisation Space Content</p> <p><i>Any VLE information asset associated with an organisation space.</i></p>	Review 2 years after subscription expiry.	Some organisational space user is periodic so retain long enough after subscription expiry to confirm organisation is no longer required.
<p>User Content</p> <p><i>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.</i></p>	Retain for 7 years after the user leaves the University.	Align with user account retention policies.
<p>System Monitoring Information</p> <p><i>Any VLE information asset associated with system administrators and/or used to operate the service.</i></p>	As per policies and operating agreements of hosting service.	<p>Align with service operation policies.</p> <p>Retain data as needed for operating the system. In principle there is little operational need for such information beyond 6- 12 months.</p>
<p>Anonymised Statistical and Reporting Information</p> <p><i>Any VLE information asset that does not contain personally identifiable information that is used for analysis or reporting.</i></p>	Can be retained indefinitely.	For benchmarking and longitudinal analysis.
<p>System Point in Time Copies (Snapshots)</p> <p><i>Any VLE information asset used for service transition.</i></p>	<p>Reviewed the earlier of: 1 year or upon the conclusion of any commissioning project or work initiative.</p> <p>Retain for a maximum of 3 years.</p>	For recovery, rollback and quality assurance during development and service transition.

VERSION CONTROL

VERSION	KEEPER	REVIEWED	APPROVED BY	APPROVAL DATE
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