



# Policy

## Retention Policy for Learning Systems Content

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## Introduction

1. Learning content is taught course materials that are created and stored on the University's Learning Systems to support teaching, learning and the student experience. This content is an information asset which should be managed within a lifecycle in line with the University records management policies and principles, which help to ensure that content is of a good quality, processed effectively and is compliant with information related regulations and legislation.
2. Learning content can take the form of audio and video recorded material. This recorded content should also be managed as an information asset regardless of the capture software solution that was used to create it.
3. The lifecycle for learning content includes the creation, storage, use, archiving and disposal of the information.

## Policy Scope

4. This policy applies to all University learning and recorded content, which is managed in the University's learning systems, that is created and accessed by students, staff, partners, contractors as well as staff working for third party agents on behalf of the institution.

## Policy Intent

5. This policy sets out the principles and requirements for the management of content on the University's Learning Systems in line with the University's records management policies and procedures.
6. The purpose of the policy is to ensure that learning content is managed effectively within a lifecycle and is accessible to authorised university users and to record managers as needed to fulfil their roles and responsibilities.

## Definitions

7. **Learning Systems** are student-facing applications that are used to support academic activities and to support student success. The term is used generically in this policy to describe all the applications that students use directly to aid their learning while on a course at the University. Examples of the University's Learning Systems include, but are not limited to, Blackboard Learn, Blackboard Collaborate, Panopto and Turnitin.
8. An **Information Asset** is any piece or collection of information that needs to be managed to derive the most value from it. It is something that cannot be replaced without cost, time, skill and resources. For this reason it needs to be shared appropriately and protected effectively because its loss or misuse would affect the University's ability to deliver services.
9. **Learning Content** refers to taught course materials that can be developed by staff or students for learning and teaching. Learning content must be managed as information assets through a defined lifecycle.
10. **Recorded Content** is audio or video material that has been created by staff or students for learning and teaching using a capture software solution (this includes lecture capture on a platform like Panopto). Recorded content must be managed as information assets through a defined lifecycle.

## **Policy Provisions and Principles**

### **General Principles**

11. The University's learning systems exist to support teaching, learning and the student experience, and generally should not be used to store business support information or for content management.
12. Course material and content should be preserved as an academic record once they are completed.
13. Students should have access to their course material and content for the duration of their studies so they can refer back to course content and feedback provided by markers.
14. Learning systems are and contain University information assets that are recorded in an information asset register and classified according to University information security and records management policies.
15. The principles set out in this policy will apply to all learning and recorded content regardless of the University system in which it is stored.
16. In compliance with data processing best practice, learning and recorded content will not be held for perpetuity.

### **Managing Learning Content**

17. Learning content must be managed within an asset lifecycle that is linked to academic sessions.
18. The information asset lifecycle for learning content must include: creation; activation; expiration; retention; and disposal.
19. Learning content should be created in advance of each academic session according to the process and procedures defined and managed by the Digital Learning Team.
20. Course material will be considered activated when they are made available to enrolled students.
21. Learning content will be preserved at the end of the academic session in which their delivery concludes. Until this point, courses can remain available to participants for reference but no further changes to content or structure should be made.
22. Preserved learning content will be retained for seven years after the academic session in which their delivery concludes.
  - For the first three years of the retention period, preserved learning content will remain on the system, as a reference copy directly viewable by those who had a role in the course while it was active (staff only).
  - For the remaining four years of the retention period, preserved learning content are held in dark storage as an archive copy.
23. Access to the archived copy can be provided in response to a legitimate query concerning preserved learning content.

24. At the end of the retention period learning content will be removed entirely from any containing system and securely destroyed, either automatically or manually.

### **Managing Recorded Content**

25. Recorded content will be preserved at the end of the academic session but will be managed differently depending on whether or not it is categorised as learning content.

- Recording of teaching without an audience such as a presentation or lecture that has been categorised as learning content will be retained for seven years after the academic session in which their delivery concludes.
- Recording of live teaching sessions where audience participation has been removed that has been categorised as learning content will be retained for seven years after the academic session in which their delivery concludes.
- Recording of live teaching sessions that include audience participation or interaction will not be categorised as learning content and will be retained for three months after the course's academic session in which their delivery concludes.

### **Other Information Assets**

26. Portfolios produced in response to the academic requirements of a programme or module are taught learning materials and have the same retention period as learning content.

27. Student completed and submitted assessments will be retained for a period of five years after the academic session in which the course delivery concludes.

28. Recording of formal student assessments will be managed like a submitted assessment above and will be subject to the normal retention of five years after the academic session in which the course delivery concludes.

29. System monitoring information and operation backups are managed by the third party hosting service according to their policies and operating agreements.

30. Anonymised statistical reporting information is retained for the period defined in the University's Records Lifecycle Management Scheme.

### **Learning Content and Data Protection**

31. Learning and recorded content can contain personally identifiable data. Data Protection legislation dictate that personal data should not be held for longer than necessary as this can increase the risks posed by information security breaches due to increasing the volume of data that is potentially affected.

32. The accountability principle of the GDPR requires us to demonstrate we are compliant with data protection laws.

33. Documented and clearly defined record retention and disposal schedules are one way in which this requirement can be met.

### **Enforcement**

34. Failure to comply with this policy may result in disciplinary action in accordance with the relevant process.

## **Key Relevant Documents**

- Archiving Policy for Learning Management Systems
- Data Protection Policy
- Records Lifecycle Management Scheme