

Learners' Record Keeping & Privacy Policy

UKPRN: 10090350

Legal Name: Africa Health Research Organization

Trading Name: AHRO University

The University meets the GDPR and Data Protection Act 2018 as outlined by the Information Commissioner's Office (ICO) guide for data protection. The university would engage the service of professional record management to help in storing and accessibility of these records as well as secure the destruction of records when requested

The university keep a learner file for each learner which contains

- Evidence of the learner, e.g. proof of identity
 - Evidence of qualification/ courses studied and achieved
 - Keeping Learner's file: Learner's file would be stored electronically. Electronic data records and documents would be stored in secure off-site cloud-based servers that meet accepted standards and legal requirement so that it can be depended upon for audit purposes
- The learner file would be stored in electronic systems with the following information:
- Learner's surname, first name
 - Course studied
 - Academic year

3.2 Retention of Learner Record

Since a learner may continue to study throughout their life, certain records will be kept for 100 years from date of birth to cover this eventuality. In general, most records associated with a student will be removed after 6 years of completing an individual module/ course. Certain records relating to practice based learning or research qualifications will be retained 6 years after completion/termination of qualification.

3.2.1 Exclusion

The following are excluded from this policy:

- Members of the public who contact the university for any reason including those purchasing products through the Open University worldwide

- Members of the public who self register for access to on-line services and participate in forums where it is necessary to be a learner
- Alumni data: Personal details transferred to alumni office system on student qualification. However, an alumnus may be considered as a current student if they register for modules subsequent to qualification.

3.2.2 This policy cover all student data, information, records and content relating to university business which was created by the University staff or student and related to an identifiable individual such as by name, PI and/ or contact details. In addition, kept by any medium or format such as sound, image, etc.

3.2.3 Generally, student record will related to management of the relationship between AU and its students, for example:

3.2.3.1 Contractual records documenting and enrolment, payment of tuition fees, and disciplinary proceedings

3.2.3.2 Transcript records documenting the modules and qualification undertaken, academic progress, etc

3.2.3.3 Student support records, documenting contact, and use of services such as disability support, careers services, etc.

3.3 Legislative and regulatory framework

3.3.1 The Data Protection Act 1998 requires that students' records should be retained for as long as is necessary. JISC guidance suggests that necessary activities include being able to:

3.3.2 Fulfill and discharge the contractual obligations established between the institution and the student, including the completion of any non-academic disciplinary action

3.3.3 Provide information on the academic career and achievements of the student to employers, licensing/regulatory bodies, and other organizations, an the student as

part of their lifelong learning record

3.3.4 Record the activities of the student as an individual and as a consumer of student support and other institutional services as a means of managing those services and planning and developing them in future.

3.4 The Data Protection Act 1998 also requires that personal data should be accurate and up-to-date. As a student can continue to study modules for many years, the deletion of certain information after a set time with the requirement for the student to re-submit up-to-date information would ensure compliance with this principle.

3.5 The contractual relationship between the institution and the student is subject to the same statutory limitations on action as any other contract, and therefore the Limitation Act 1980 and Prescription & Limitation (Scotland) Act 1973 apply to the student relationship with AU

3.6 Regulators such as HEFCE, require that information should kept for certain period of time

3.7 Student data may be affected by other legislation relating to particular areas of activity.

4.0 Management and Retention of Personal Data

4.1 The timeframe for retaining personal data must be within the required legislation and regulatory requirement and must meet business requirements. However, the choice of retention timeframes should be kept to a minimum period in order to simplify the task of managing large data.

4.2 Long terms records approximately 100 years from fate of birth

4.3 Legal, contractual and regulatory requirements

Below are legal/contractual requirements needed to keep records and data relating to payment of fees, registration, etc for six years after the student has completed or

withdrawn from the module or programme.

4.3.1 Student support services (6 years from completion of transaction)

4.3.2 Operational records (up to 3 years from completion of activity)

4.3.3 Accuracy of records

Personal data must be accurate.

4.3.4 Sharing data with third parties

4.3.4.1 Personal data owned by the university may, on occasion, be shared with third parties. Where the third party is acting as our agent on the basis of the university instructions.

4.3.4.2 Where professional bodies and partner organization require university to retain student data and records for significant periods of time the period will be clearly specified in the agreement between these organizations and AU and then added to the retention schedule.

4.3.4.3 Where the third party is taking ownership of AU student data, the third party becomes the data controller. The data is then subjected to that third party retention policy.

4.3.4.4 Third parties with regulatory or statutory remit may require information from AU without stating a limit for the age of data. In this case, a retention period should be set on the basis of risk analysis.

5.0 Roles and Responsibilities

5.1 The University Secretary is the information owner for the university

5.2 The Director of Courses is the University officer responsible for student data and records

5.3 The record manager provides tools, advice and guidance to ensure the university records are maintained according to legislation and best practices.

5.4 It is the responsibility of each Course Director to ensure that they comply with this policy in relation to student data and records held on private system.

5.5 It is responsibility of the lecturers to ensure that they comply with this policy in relation to student data and records held on private systems

5.6 It is the responsibility of students using personal data and information accessible within the university's on-line learning system to handle such data in line with the computing code of conduct.

5.7 Student data and records in central database and records systems will be destroyed in line with this policy and the Retention Schedule.

The above described policies will be reviewed every 3 years at the instigation of Director of Courses. There will be annual review to evaluate if amendments to any of the policies are required due to changing legislation.

The Director of Courses may at anytime request stakeholders to submit report on their compliance with any of the policies

All queries related to any of the policies should be directed to the Records Manager while issues related to non-compliance should be directed to the Office of the Inspector General

These policies has been approved & authorized by office of the Director-General on 26/01/2021