

UNIVERSITY OF BIRMINGHAM**POLICY ON RETENTION OF STUDENTS' ASSESSED WORK**

1. Purpose

- 1.1. This policy sets out the University's approach to the retention of records of students' assessed work. It ensures that the University retains appropriate evidence to demonstrate that assessment practices are effective, valid and reliable, and that academic awards are credible, in line with the Office for Students (OfS) regulatory requirements, in particular Conditions B4 and B5.
- 1.2. The policy is intended to balance regulatory expectations with proportionate and practical approaches to storage, access, and disposal.

2. Scope

- 2.1. This policy applies to:
 - All taught provision, including undergraduate, postgraduate taught, apprenticeships, and collaborative provision.
 - All modes of assessment, including written, digital, performance-based, practical, and oral assessments.
 - All credit-bearing summative assessment contributing to University awards.
- 2.2. Formative assessment that does not contribute to progression or award outcomes is out of scope, unless it is explicitly required to evidence assessment decisions or achievement of learning outcomes.
- 2.3. This policy does not apply to doctoral theses. PhD theses are managed through the University's library and research repository processes.

3. Definitions

- 3.1. **Assessed work:** Student work submitted for summative assessment that contributes to progression, completion, classification, or the award of credit or a qualification. Purely formative activity that does not contribute to credit or progression is out of scope unless it forms part of a summative assessment process.
- 3.2. **Record of assessment:** The minimum assessment record retained for each summative assessment component, comprising:
 - The assessment brief or examination paper and any approved variations;
 - Marking criteria and/or rubric, including model answers or marking schemes where used;
 - The awarded mark and outcome, including capped marks and late penalties where applicable;
 - Feedback released to the student;
 - Marker and assessor roles and dates of marking;
 - Metadata linking the record to the relevant module, assessment component, sitting, and attempt;
 - Where reasonable adjustments materially affect the conditions of assessment, a record that an adjustment was applied, without recording unnecessary sensitive detail.
- 3.3. **Course end date:** The date recorded by the University formal record systems as the course's end date for regulatory and records purposes. For courses that are withdrawn from offer (no longer recruiting), the course end date is the date of final cohort completion for that course (including any approved reassessments within the course regulations). The date a course is marked 'withdrawn' is not, by itself, the course end date unless it coincides with final cohort completion.

- 3.4. **Retention period:** Five years after the course end date, unless a longer period is required under another policy, legal obligation, or professional, statutory, or regulatory body requirement.
- 3.5. **Operational owner:** The University service area responsible for the operation of a system or process used to deliver, store, archive, export, or retrieve assessed work and assessment records. This includes ownership of retention configuration, access controls, and supplier or contractual arrangements where applicable.

4. Regulatory context and policy requirements

- 4.1. The OfS requires providers to retain appropriate records of students' assessed work to enable, where required, an independent assessment to be made as to whether academic standards and awards are credible, reliable, and aligned with sector-recognised standards. The University determines what constitutes appropriate records.
- 4.2. Accordingly, for each summative assessment component the University must retain:
- A record of assessment (as defined by this policy); and
 - The assessed work submitted, or an approved sample of assessed work, in line with this policy and Annex A.
- 4.3. Records and retained work must be:
- Securely stored;
 - Retrievable and readable for the full retention period;
 - Exportable and capable of being produced in an intelligible format if systems or platforms change;
 - Accessible only to authorised roles.
- 4.4. Assessed work and records of assessment are retained for five years after the course end date. Disposal is suspended where an exception or hold applies (see Section 9).
- 4.5. **Student privacy and transparency:** Where the retention approach affects how student assessed work is processed, stored, or disclosed, the University will ensure that relevant information is reflected in the [Student Privacy Notice](#) and associated privacy information, including the retention period, purposes for retention, and categories of recipients where applicable.

5. Retention approach, sampling, and production of evidence

- 5.1. The University adopts a proportionate, risk-based approach to retaining assessed work and assessment records. The approach is designed to provide appropriate evidence of assessment standards while minimising avoidable administrative burden.
- 5.2. Digitised assessment is the default evidence source. Where assessment is non-digital by nature, proportionate alternative evidence is retained (for example, a structured observation record, photographic record, video or audio recording where feasible, or other equivalent evidence), as set out in Annex A. Where non-digital assessed work is retained, this will be in a form that remains retrievable and intelligible for the retention period.
- 5.3. Where evidence is required for regulatory scrutiny, samples of assessed work will be produced using a documented, auditable sampling method. Sampling is undertaken at the level of each summative assessment component for each sitting, including first attempts and reassessments where applicable.

Sampling includes (i) a main sample for each assessment component and sitting and (ii) a longitudinal sample for a selection of students across years of study. Samples must be representative and must evidence the full range of student achievement, including across academic years of delivery where relevant. In practice, this is achieved by selection across defined mark bands (including fails, borderline passes, mid-range performance, and high performance), with reassessment work treated as a distinct category where reassessment is offered. This approach aligns with the Code of Practice on Taught Programme and Module Assessment and Feedback and provides reliable evidence of assessment design, marking consistency, and standard-setting.

Production of samples

- 5.4. If the University is required to provide samples of assessed work, the relevant Education Administration team (function currently situated in Schools) is responsible for coordinating the identification and production of those samples. This includes identifying the relevant programmes, modules, assessment components, sittings, and the students included in any longitudinal sample.
- 5.5. Where the assessed work is held in a digital system of record, for example Canvas, Digital Education will support, where possible, automated extraction and packaging of samples using University-approved reporting and analytics tools.
- 5.6. Where assessed work is held outside the main system of record, including within third-party or specialist assessment tools, the relevant School or Principal Academic Unit (PAU) is responsible for ensuring that the work can be retrieved and produced in an intelligible format. The relevant Education Administration Team will coordinate retrieval, working with the PAU and the relevant operational owner to ensure that the work can be retrieved, exported where necessary, and packaged appropriately.
- 5.7. A sampling record is retained that documents the sampling method, date, selector role, data source or tool used, and the identifiers of selected work. Sampling records are stored securely and access-controlled.

Minimum sample sizes

- 5.8. For each assessment component and sitting, the minimum sample size for the main sample is set out in Table 1.

Number of pieces of work in the cohort	Minimum sample to be reviewed
100 or more	Square root of the total number, rounded up
Between 10-99	10 pieces of work
Below 10	All pieces of work

Table 1: Minimum sample size for the main sample

- 5.9. In addition to assessment-component sampling, the University retains a longitudinal sample of assessed work for a random selection of students per programme per academic year. The longitudinal sample evidences standards across years of study for individual students contributing to the award. The default sample size shall be determined using the square root of N , where N represents the total number of students registered on the programme. Where the calculated sample size is fewer than 10, all assessed work shall be retained or included in the sample. Selection is randomised and, where feasible, stratified by outcome to reduce bias. For each selected student, the longitudinal sample includes summative assessed work across all years of study that contribute to the award.

6. Access, anonymisation, and data protection

- 6.1. Retained assessed work and assessment records may include student identifiers where operationally necessary for teaching, assessment processes, academic integrity procedures, complaints, or appeals. Access to retained records is restricted to authorised roles and is logged in accordance with the University's data protection, information security, and records management policies.
- 6.2. Where evidence is disclosed to the OfS, the University will, where feasible, provide a disclosure pack with identifiers removed or pseudonymised (that is, with direct identifiers removed and replaced with coded references where necessary). A documented exception list is maintained for assessment types where anonymisation is not practicable.
- 6.3. Retained assessed work and assessment records are used only for assessment, quality assurance, regulatory, and related academic governance purposes. Data minimisation, security, and access controls are applied in accordance with the University's data protection and records management policies.

7. Systems and storage

- 7.1. The University maintains a system of record for assessed work and assessment records. Retained records must remain retrievable, readable, and exportable for the full retention period, irrespective of changes to digital platforms.
- 7.2. Where third-party or integrated assessment tools are used, responsibilities for ensuring compliant retention, retrieval, export (where necessary), and production of records in an intelligible format are set out in Section 10.4. Records held in third-party or specialist tools must remain accessible for the full retention period.

8. Collaborative provision, PSRBs, and apprenticeships

Collaborative provision

- 8.1. Collaborative agreements must specify responsibilities for retention, access, retrieval timescales, audit rights, and arrangements for transfer or continued access when a partnership ends.

Professional, statutory, and regulatory bodies (PSRBs)

- 8.2. Where a professional, statutory, or regulatory body requires longer retention, the longer period applies. Where a requirement would imply shorter retention, the minimum retention set out in this policy still applies.

Apprenticeships

- 8.3. This policy applies to assessed work and assessment records that contribute to University credit and University awards within apprenticeship programmes.
- 8.4. Where the end-point assessment (EPA) is integrated within the academic programme and contributes to University credit or award outcomes, the University acts as both the training provider and the end-point assessment organisation (EPAO) for the purposes of assessment delivery and evidence. Retention of assessed work and assessment records must follow this policy.

- 8.5. Where the EPA is conducted independently of the academic programme and does not contribute to University credit, an external, registered EPAO (listed on the Register of End-Point Assessment Organisations (RoEPAO)) is responsible for delivering the EPA. In these cases:
- Assessed work and assessment records that contribute to University credit and awards remain within scope of this policy and are retained accordingly;
 - EPA evidence packs required for the EPA process, including gateway documentation and any preparatory materials submitted in advance of the EPA (for example presentation slides and supporting documentation), must be retained by the training provider as part of formal evidence packs and uploaded to the EPAO's designated platform, in line with EPAO requirements and apprenticeship governance arrangements.
- 8.6. The University must have arrangements in place that enable timely retrieval and production of evidence relating to the academic, credit-bearing assessment within scope of this policy where required for quality assurance or regulatory scrutiny.

9. Exceptions, holds, and disposal

Exceptions and holds

- 9.1. Disposal of assessed work and assessment records is suspended where a matter is ongoing or reasonably anticipated, including academic misconduct investigations, complaints, appeals, fitness to practise proceedings, litigation, or regulatory investigation.
- 9.2. Where multiple assessment attempts apply, records are retained for each attempt, and the retention period runs from the course end date.

Disposal

- 9.3. Disposal of digital assessment is currently under review for Canvas and other Digital Education tools. This policy will be updated with the arrangements for archive and deletion of digital assessment once finalised and approved.

10. Governance, assurance, and review

- 10.1. The University assigns clear governance and operational responsibilities for the retention of assessed work and assessment records to ensure compliance with regulatory requirements and effective implementation of this policy.

Policy ownership and approval

- 10.2. Registry is responsible for maintaining this policy, preparing amendments, and ensuring alignment with regulatory expectations, including those of the OfS. Material changes to the policy are approved by University Education Committee (UEC) on behalf of Senate.

Operational ownership and responsibilities

- 10.3. Operational ownership is assigned according to the University service area responsible for the operation of systems and processes used to deliver, store, archive, export, or retrieve assessed work and assessment records.

10.4. In particular:

- **The relevant Education Administration team** (function currently situated in Schools) are responsible for identifying the relevant programmes, modules, assessment components, sittings, and student cohorts for which assessed work and records must be retained or sampled, and for coordinating requests for evidence, including regulatory requests.
- **Digital Education** is responsible for the operation of the University's digital assessment systems of record within the Institutional Digital Ecosystem of tools (with some tools being locally owned and managed, e.g. MaxExam and CAFS), including configuration for retention, archiving, access control, and the approved extraction and packaging of assessed work and associated records.
- **Schools and PAUs** are responsible for ensuring that, where third-party, specialist, or integrated assessment systems are used, assessed work and assessment records held in those systems can be retained, retrieved, exported where necessary, and produced in an intelligible format for the full retention period. This must be achieved in collaboration with the relevant operational owner, who is responsible for operation of the relevant system or service (including retention configuration, access controls, and supplier or contractual arrangements where applicable).
- **Schools and PAUs** are responsible for ensuring that assessment activity is conducted in a way that generates the required records, that local exceptions or holds are identified and documented, and that relevant information is provided to the relevant Education Administration Team (function currently situated in Schools).

Assurance and monitoring

10.5. Compliance with this policy is managed locally and monitored through the University's Quality Enhancement and Standard Committee (QESC), Legal Services, and Internal Audit. Monitoring may include periodic checks of retention practice, sampling records, and the ability to retrieve and produce evidence in line with this policy.

Review

10.6. This policy is reviewed at least annually, and additionally where there is a material change in regulatory expectations, assessment practice, or systems used to deliver and store assessed work.

Annex A: Framework for Retention of Students' Assessed Work (by assessment type)

Retention period: Five years after the course end date (unless extended by holds, legal requirements, or PSRB requirements).

<u>Assessment type</u>	<u>Examples</u>	<u>Evidence to be retained (minimum)</u>	<u>Supporting contextual evidence</u>
Written work or written elements (digital)	Exams (where digitised), essays, dissertations, posters, lab reports, presentations (content), fieldwork notebooks, journals	Assessment brief and/or question paper (as applicable), including the final version issued to students and any approved variations; Record of assessment; Assessed work submitted or approved sample (digital submission/export)	Marking criteria/rubric; marking scheme/model answers where used; where applicable; sampling record
Practical work (laboratory)	Practical write-ups, lab books (where assessed), worksheets	Assessment brief; Record of assessment; Assessed work submitted or approved sample (digitised where applicable)	Marking criteria/rubric; structured observation template where relevant; sampling record
Physical artefacts	Sculpture, textiles, fashion, artwork	Assessment brief; Record of assessment; Proportionate proxy evidence where the artefact cannot reasonably be retained (for example photographs, video, portfolio documentation), or retained artefact/sample where feasible	Marking criteria/rubric; assessor notes linked to criteria where relevant; sampling record
Digital media	Film, video, podcast, digital design	Assessment brief; Record of assessment; Assessed work submitted or approved sample (digital file/export)	Marking criteria/rubric; sampling record
Performance	Dance, drama, music, production	Assessment brief; Record of assessment; Assessor observations and/or structured observation template; Recording (audio/video) where feasible and proportionate	Marking criteria/rubric; sampling record
Assessed through observation	OSCE, Vivas, moots, presentations, debates, clinical/practical sport	Assessment brief; Record of assessment; Assessor observations using a structured template; Recording where feasible and proportionate	Marking criteria/rubric; sampling record
Continuous assessment (including placements)	Placement logs, supervisor reports,	Assessment brief; Record of assessment; Assessed work or approved sample (including placement evidence that contributes to credit)	Marking criteria/rubric; placement assessment guidance; sampling record

	reflective pieces, portfolios, projects		
Group work	Group reports, group presentations, group artefacts	Assessment brief; Record of assessment; Assessed work or approved sample	Marking criteria/rubric; evidence of individual attribution and basis for individual marks where applicable; sampling record