

Managing Students' Records as Corporate Social Responsibility: The Demand for Accessibility and Confidentiality

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Abstract

Students' records are a very important asset to any educational institution since they document and preserve a students' academic journey and his interface with the institution. They are also vital because provide information about a student's competencies, skills, and aptitude; thus serving as a vital link to even assess a student's suitability for work and life. Hence, these records require best practices in managing them. However, a conflict exists between the rights of students to privacy and the needs of the university and/or others to obtain information about them. This conflict is prevalent in institutions of higher learning, and centers on the following issues: what information is obtained? Where it is obtained? Where and how it is kept? Who requests what information to be given? The demand for the disclosure of students' records by stakeholders and the ethical imperative of confidentiality by record managers sometimes come in conflict. This is even compounded by the legal implications that may arise when privacy is violated. The paper, therefore, design and method of discuss are focused on the types, description, and location of student's records, the value of students' records, some guiding principles of caring for student's records with a consideration of its level of sensitivity with reviewed literature of university/ government policy governing privacy and disclosure of student information/records.

This paper ends with some guidelines in regard to cooperatesocial responsibility in caring and safeguarding the privacy of information and records entrusted to all who handles student's records. And further conclusion and recommendations by author.

Keywords: Students Records, Accessibility, Confidentiality, and Social Corporate Responsibility.

Introduction

How we give users access to the students record information they need, when and where they need it, and in what format is now a major concern to academic institutions of higher learning. Record according to Popoola (2000) is documented information, in any form, including data in computer systems, created or received and maintained by an organization or person in the transaction of business or the conduct of affairs and kept as evidence of such activity. "Student record" may refer to any record (paper, electronic, video, audio, biometrics etc.) directly related to a student from which this identity can be recognized and judgments made. These records which may be maintained by the education program/institution or a person acting for the institution may include application materials of students admitted and matriculated (Standard 304.4). Regina (2011:40) argues that "Students' records occupy a strategic position, in the effective and efficient organization and administration of universities because they document the planning and implementation of an appropriate course of actions

allowing proper monitoring of activities/tasks. Students’ records are important because they serve as major information tools that sustain the school and aid in achieving educational goals and objectives”Further, Kansas State Historical Society (2007) supporting Regina (2011:40) statesstudents’ records are universally acknowledged fundamental tools in the business of a university and their absence can lead to inefficiencies or failure in operational procedures.Students’ recorded information are classified according to their purposes. These include records relating to students admission/matriculation, enrolment/registration records, financial records, disciplinary records, academic cumulative records-results/transcripts, convocation/graduation records and students’ counselling records.

The business of managing students’ records requires privacy and confidentiality of student records as matters of ethical practice. As it has been observed, Ngulube (2000) argues that the movement for freedom of information calls for a serious consideration of ethical issues. And there is a need to justify the reasons for decisions taken on whether to give or to withhold information from the public. The demand for records accessibility from a third party and the demand for records confidentiality from the records owner require social corporate responsibility for proper management of students’ records.

Types, Description and Location of Students Records

Students’ records are varied. They range from pure academic records to auxiliary records; all of which document the activities of a student and his interactions with the institution from admission to graduation. These types of records and where they are kept in the university could be illustrated in the table below.

Type of Record	Description	Campus Office Location
Academic Record	Permanent academic record and supporting documents (transcripts, application for admission, biographical data, letters of recommendations, student vita),registrationtransfer credit evaluation,and academic performance, etc	Registrar, Dean, Department, Faculty Advising
Financial Record	Financial records of students: payment of tuition fees, university bill, students’ current financial aid status	Business/Finance Office, Financial Aid/Scholarship
Placement Record	Placement folder (letters of recommendations, student CVand Student teaching evaluation)	Career Services and Professional Life
Accommodation&Disciplinary Record	Discipline Proceedings, actions or sanctions, records documenting use of accommodation services,	Students Affairs/Students Services
Health and Counseling Record information	Counseling/Health Care records by the university Health Centre/Hospital and Counseling unit	School Counseling unit/Health Centre/Hospital
Security& Safety Record	Report of security alert, investigations,	Campus Security Department

According to JISC IfoNet (2007:3), Students' records can be organized into three broad categories, each of which may be additionally divided:

- i. "Records documenting the contractual relationship between the student and the Institution (for instance, records documenting admission and enrolment, payment of tuition fees, academic and non-academic disciplinary proceedings).
- ii. Records documenting the student as a learner (for example, records documenting programmes undertaken, academic progress and performance, awards).
- iii. Records documenting the student as an individual and consumer of services provided by the institution (examples are records documenting use of accommodation services, counselling services, library and IT support services, careers and employment services)."

The Value of Students Records

Student records information falls into two general categories. These are public information, to which parents are given have access. A parent, guidance or spouse may obtain the public information without prior authorization from the student. The second category consists of information that are confidential in nature, to which third parties may only have access if there is appropriate written authorization signed by the student. However, students' records, whatever their categories whether in paper or electric format are important resources for schools and should be harnessed through effective records management practices. The smooth running of any educational institution depends on the effective and efficient care of records. The maintenance of students' records involves proper records management. Records management according to Ifedili and Agbaire (2011) "involves the effective, efficient and systematic control of the processes of creating, receiving, maintaining, and disposing of valuable information about the organization. It is the means of processing information for optimum accessibility and usability, concerned with the origination, collection, organization, storage, retrieval, interpretation, transmission, transformation and use." Consequently, Anho (2006), summarized the significance of student records as follows:

- i. To ensure that accurate and proper records of student's achievement and growth during his/her school days are kept and to report same to parents/guardians, employers, other institutions for students further admission or job placement
- ii. The provision of data for planning and decision making by school heads, ministry of education and other related authorities
- iii. The facilitation of continuity in the administration of a school, research activities that will promote efficiency and effectiveness
- iv. To provide information needed by lecturers, staff, counselors in working with students.

Further on this, Ifedili and Agbaire (2011) in Nwaomah (2015:33)add that:

- i) Educational regulatory bodies rely on education records to evaluate the status of governance of an institution and academic quality of schools.
- ii) School administrators rely on records to evaluate students' performance and reward same.

- iii) Researchers in education also find relevance in students' records for their researches towards contributing to knowledge.

Similarly, the South Australia department of education argues that student records are essential to enhance students learning including education planning, and administration and report to their parents (Government of South Australia, 2012). We may, therefore, conclude from all the submissions above that student' records are very significant to the well-being of an institution, students, and stakeholders who rely on these records to make appropriate judgments and for planning. Students' records also to a large degree determine the value that may be placed on a student's competencies, skills, and aptitude.

Caring for Students' Records

Records keeping generally are guided by some level of confidentiality, security, preservation of the content and context, proper maintenance, etc. (International Journal of Education and Science, 2009). According to University of Greenwich (2014), Governance and Management; Records Management Good Practice Note 12: Security of Records "there are many reasons for making sure that students' records/ documents/information are kept securely. The contents of the records may contain (i) Personal or confidential information, records like- admission documents, evaluations, transcripts (grades), test scores, exam papers, and (ii) commercial information also sensitive, records like- financial data, and loan collection records, health information.

Level of Sensitivity or Security of Students' Record

Greenwich University (2014) Records Management Good Practice Note 6: states that the level of security required for a record varies, depending on the content of the record. Some records may have a very low sensitivity level, requiring very little or no security while others will have a high level of sensitivity, needing high security." The Greenwich University categorizes records in terms of their level of sensitivity. The level of sensitivity determines the level of the records security. These categories are low level, medium level, and high-level records. Low-level records are those records, which have a low level of sensitivity. They may require very little or no security. Such records (e.g. some policies and procedures, some minutes of meetings and academic regulations) may be provided easily upon request. These records could be documents already in wide circulation in the university and such that they can sometimes be found in public domain.

The next of level of records sensitivity is the medium level records. This level normally has a higher sensitivity/security level. In this category are records that have some personal information sensitivity or financial/commercial sensitivity. This type of records will not routinely be disclosed upon request. The final level is the high-level record. "They refer to those documents that possess rather high sensitive, either commercially or financially. They include personal information of a sensitive nature, and they may be information given in confidence, or they may be records retained for an investigation" (Greenwich University, 2014) Records Management Good Practice Note 6 on Retention and Disposal).

However, the majority of those who demand access to students' records are not usually aware of these categorizations; nor do they appreciate them if it is brought to their attention. But in dealing with students' records, experiences have shown that there are frequently asked questions. Some of these questions are identified and discussed below.

The first question is "what student information is considered to be public information? In response to this, it is worthy to note that public information also referred to as directory information may be obtained without prior authorization. Each university, college, department office, programme, or entity, which maintains records, will be required to give public notice of the information categorized and designated as directory information. Different schools may have their students directory information categorized and designated differently. The schools are not required to include all of the following, but may not designate as directory information anything more than:

- student's name
- addresses (e-mail/postal)
- telephone contact
- day and month of birth
- program enrollment status (part-time or full-time etc.)
- class level (e.g. first year or 2nd year students)
- number of units enrolled
- program/course of study
- former school attended
- dates of attendance
- degrees awarded
- honors received
- official student activities participation

The second question concerns what information is considered to be confidential information? In addressing this, Berkeley University of California, office of the Registrar, under the Federal Family Educational Rights and Privacy Act of 1974 (FERPA) and provisions of state law relating to public records disclosure, placed emphasis on (i) "everything that is not included in the list of "directory information" is considered confidential and (ii) policies also permit students to have the University treat directory information as confidential, so third parties' access to the above information may be limited if a student so requests."

Finally, the question is asked, what can be disclosed to the student? In this area, the students have access to almost every part of his or her own student record including, but not limited to: transcripts (grades), exam papers, test scores, evaluations, health care record, financial aid records and loan collection records.

Accessibility Demand from Sponsors, Stakeholders, Spouses and Parents

At times, stakeholders who demand access to students' records argue that such student is their employee and under their sponsorship. It should, however, be noted that sponsorship of a student does not automatically guarantee sponsors unhindered access to students' records. A university considers a student who though may also be an employee of another organization as an adult, regardless of financial dependence and or age. Under the Federal Education Rights and Privacy Act of 1974 (FERPA), "when a student turns 18 years of age or attends a postsecondary institution, the student, and not the parent/sponsor, may access, seek to amend, and consent to disclosures of his or her education records." Under the same law,

“the university is prohibited from providing certain information from student records to a third party, such as information on grades, billing, tuition and fees assessments, financial aid (including scholarships, grants, work-study, or loan amounts) and other student record information.” This restriction applies but is not limited to parents, spouse, and sponsors, etc.” But a parent, sponsor, spouse or stakeholder, can without prior authorization obtain public information of a student.

The Freedom of Information and Protection of Privacy Act ([RSBC 1996] Chapter 165) prevent the unauthorized collection, use or disclosure of personal information by public bodies. The government regulations of the right to access information or freedom of information is part of a complex set of laws regulating access to information. In the case of students records, the regulation authorizes access by government regulating bodies/agencies as the policy may allow for official purposes. Thus, confidential information may be disclosed if required by law and access rights will be granted in a controlled manner.

The above knowledge calls for corporate responsibility as any academic institution that violates the above regulations could expose the institution to lawsuits by their students.

Corporate Social Responsibility In Caring For Students Records

Confidentiality/Protecting Students' Privacy

Confidentiality, privacy and security are three important concepts used in discussing protection of student's academics records, counseling/health information, financial record information, etc. The obligation of professionals having access to students records or communication and holding that information in confidence is termed. Confidentiality is recognized by law as privileged communication between two parties in a professional relationship, such as with a teacher and students, patient and a physician, a counselor and a student (Brodnik, Rinehart-Thompson, Reynolds, 2012). Prater, (2014) assert that privacy is distinct from confidentiality and is viewed as the right of the individual student to be alone and to make decisions about how personal information is shared.

The Registrar's office is expected to ensure the confidentiality and accuracy of student records, however, University of California Education Board Program; Student Privacy Policy (2018) in support of corporate social responsibility explains “everyone with access to information about a present or former student is responsible for complying with the law and university policies on the use, maintenance, and disclosure of student information. When information from a student education record is released, consistent with law and policy, to a third party, the individual releasing the information is responsible for informing the recipient that the disclosure of information is subject to the condition that the information not be released to any other party without the prior consent of the student, unless otherwise permitted by law and policy.” It is important to note that improper maintenance, unauthorized release and access of confidential information of a former student or present student could expose the university to significant risk and this could also be a disservice to the students. In order to protect Students information Privacy Virginia Tech (2016) posits the following:

- “Requests for information on the academic record of a student should be referred to an appropriate academic record official. Any questions relative to the appropriateness of releasing information, should be directed to the University Registrar.
- Only those individual records necessary for the fulfillment of teaching or advising responsibilities should be kept. Private notes concerning interaction with a student should not be part of the academic record and should be kept separate.

- Student scores or grades should not be displayed publicly in association with any portion of the student name or identification number.
- Students should not have access to the scores and grades of others.
- There should be no request of academic record information from the department or university record custodians unless there is a legitimate education need to know the specific information.
- Sharing academic record information from a student's record with third parties, including parents, spouses, colleagues, without the written permission of the student should be avoided.”
- Sensitive student documents on the desk or computer screen should not be left exposed when unattended.”Further, University of Greenwich (2014), Governance and Management; Records Management Good Practice Note 12: Security of Records adds “when working from home, working on a laptop, and transporting data between work-sites and home, the same if not a higher level of care should be taken. They should also guard against accidental loss, malicious damage or theft, or the possibility of third parties being able to view data.

Security of Students’ Records

Corporate social responsibility involves the security of the students’ records by all units and departments that deals with students. Prater, (2014) states “security refers directly to protection, and specifically to the means used to protect the privacy of students record information and support professionals in holding that information in confidence.”The records authenticity to a large extent depends on information security. Here are some of the questions that are frequently asked regarding records information security- was the information captured correct? was it accurate and complete? was it altered or changed in any way (either purposely or accidentally)?

To a large extent, it is often believed that paper record carries more evidential weight than an electronic or digital record or file. This is because electronic records have some specific difficulties with maintaining the integrity as it is subjected to modifications, “media deterioration” and manipulation since they could be “written, rewritten, cut and pasted, send to the other end or deleted” querying the authenticity of records” (Ngoepe, 2008:35). Therefore, electronic records, in order to protect them from alteration or change require the same care and handling as that of the paper records.

It is a good idea to date documents with electronic records,(avoid using the automatic date field, which will change every time a document is viewed), access to the documents should be reduced or apply read-only and password access, a new versions of documents can be maintained rather than just overwriting previous ones.

Corporate codes of ethics should be applied to corporate records management practices. University of Strathclyde Glasgow: Best Practice Guidance on Information and Records Management (2012:5)states the following key points in regard to securing students data/information records.

- “Access to students records should be restricted to only those staff who require it. The records should be secure i.e. in a locked cabinet/backed-up to a university server.

- Email should not be considered a secure mechanism for sending information. Once an email leaves the university's system there is no control over the systems and networks it may pass through and no guarantee what might happen to it.”
- Confidential information should not be displayed in public places.
- Be aware of the inherent dangers in using portable media such as laptops/USB drives/CDs. These are easily lost and/or stolen.
- Passwords for your personal university IT accounts should not be share with others.
- Lock before you walk - always lock your workstation when you are away from your desk.

Transferring Records: when there is need to send to a third party or other location, a student record, outside or within the university, it is important for necessary security precautions to be taken to protect the record in transit. This will include packaging appropriately, addressing correctly and sending in the most appropriate format.”

According to University of Greenwich (2014), an international consensus on the importance of information (especially full and free access to information) is fast emerging. However, the Data Protection Act 1998 requires us to keep any records, which contain personal data in the most secure manner possible. It is also good practice to protect records, even when they do not contain personal data. They may need protecting because they are commercially sensitive, and they may also need protecting because they are business critical or key in some way. They may also be simply important for you, in order for you to carry out your role efficiently and easily. Therefore, the security of records should be regarded as an ethical issue with corporate responsibility that should receive sufficient attention by all managers.

In managing records, vigilance is key to ensure high standards, whether records are in paper or electronic formats. The Best Practice Guidance provided by the Virginia Tech (2016) and University of Strathclyde Glasgow are in my opinion and to a large extent are potentially good steps for balancing the demand of accessibility and confidentiality of students' records when heeded to in Africa academic institutions.

Conclusion & Recommendations

Students' records if properly managed are valuable assets that assist institutions in achieving their goals. Proper care of students' records is the foundation any university needs to provide services, to fulfill its obligation of accountability towards her students and to protect their rights.

Students' records may contain confidential or personal information, business information such as financial data that may be sensitive. It is vital that these be kept secure. Thus, every teacher and administrative staff who works with students' records should ensure that his/her records are trustworthy.

It is equally important that, those records can be proved to be what they meant to be, immune from any sort of tampering and corruption.

It is necessary that the international community of schools understand the sensitive nature of students' records. Protecting the privacy of information entrusted to, programme administrator or a teacher in an institution is an ethical and not just a legal obligation. According to Principle of Ethics IV of the Code of Ethics, “Individuals shall honor their responsibilities to the professions and their relationships with colleagues and students.” The American Speech-Language-Hearing Association (ASHA, 2013) states professional regard for

students involves respecting each student as the arbiter of what personal information may be divulged and to whom it may be divulged.

Further, the author therefore, concludes by recommending that all who works with students records have the responsibility to respect that information. Students have privacy rights with regard to their own records information and they expect that their information be held in confidence and protected.

Thus, educational institutions should be abreast of legal requirements and best practice in records management, and ensure compliance of all who handles students' records create a sensitive-value framework upon which records management policies are implemented. Recognizing documents that contain personal or sensitive information, or information that is valuable to the institution/ has business value. A sensitive-value framework will help records managers assess which content is the most sensitive, and at the same time, presents the most valuable in order to avoid disservice to students.

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