

# Learn.gold Virtual Learning Environment Retention Policy

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Ownership	Director of the Teaching and Learning Innovation Centre
Policy Contact	Director of Teaching Learning Innovation Centre
Approval	July 2025
Protective Marking	Public
Next review date	November 2027

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# 1 Introduction

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This policy outlines the retention and deletion of content within the Moodle Virtual Learning Environment (VLE) at Goldsmiths, University of London, known as learn.gold. Its aim is to ensure compliance with data protection regulations, the requirements of regulatory bodies such as the Office for Students, as well as supporting institutional needs such as ensuring easy access to learning materials for students and staff balanced with our commitments to financial and environmental sustainability.

In particular, the policy responds to:

- Goldsmiths' [Interim Retention Schedule](#)
- Limitation Act 1980 c. 58 s 5
- Office for Students [Conditions of Registration](#) B4 and B5
- Data Protection Act 2018

And has been developed through consultation with:

- Office for Students (2024), [Supplementary guidance: Retention of assessed work](#)
- Jisc Guidance on [Records Retention Management](#)

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# 2 Scope

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2.1 This policy applies to all staff, students and external authorised users of learn.gold.

2.2 It covers all data or files created in, uploaded to, and stored in learn.gold

Including:

- Student user data
- Staff user data
- Database entries such as Moodle logs
- Data/materials held in course areas (created annually as part of course creation):
  - Teaching resources such as Word documents and PowerPoint presentations
  - Assessment submissions
  - Feedback on students' assessment submissions

- Forum posts
- Quiz responses
- Wiki entries
- There is no conflict with individual's intellectual property or performing rights
- Data/materials held in non-course areas (department pages, sandpit pages)
- Any associated backup systems

The policy does not include:

- Content stored in other systems but displayed in learn.gold, including Panopto recordings, Teams recordings and Turnitin.
- Summative assessment marks, the definitive source of truth being the student records system
- Curriculum information as this is held in the curriculum catalogue
- Other virtual learning environments apart from learn.gold, including those based in Moodle.

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### 3 Principles

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The principles guiding the parameters of this policy are:

- Students being able to access their complete online learning experience within the familiar setting of learn.gold for the duration of their programme
- Minimising the costs associated with data storage and increasing sustainability by reducing Goldsmiths' carbon footprint
- Meeting the Interim Retention Policy requirements around student data and assessments e.g. student names, feedback associated with students, and staff names (end of registered relationship plus 6 years)
- Meeting statutory requirements around retaining assessed work for OfS auditing purposes (programme plus 5 years)
- Following guidance set out in the Jisc Records Retention Management Guidance
- Minimising the risks of data breaches in line with good data management
- Efficiencies in the management of data deletion including ease of communication with potentially affected staff

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## 4 Policy

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### Student and staff users

- This relates to data held in learn.gold about students and staff. For student users this includes name, email, username, department, student number and photo, as well as provisional marks, and staff feedback e.g. on summative assessments.
- Staff and student user data is annually updated during the summer.
- Staff user data is retained from the end of their contract plus 6 years then deleted
- Student user data is retained from end of programme plus 6 years then deleted
- CoSector run reports in the form of spreadsheets to identify users with 6 years without logging in in learn.gold
- TaLIC approve the deletion based on these spreadsheets
- If users request their data is deleted before this time period TaLIC will contact CoSector

### Database entries such as Moodle logs

- Moodle logs relate to the detailed data Moodle collects on users' activities across the platform. The data can be used by staff users to create reports, and the data can also be exported. They take up a lot of storage space.
- Moodle logs are automatically deleted after 1 calendar year

### Data/materials held in course areas (created annually as part of course creation)

- Course area is the Moodle term for the module pages where teaching, support, assessment materials, grades and student feedback are stored and shared with users. They are categorised within Moodle based on Module Code, School/Department, and year. They form the main VLE content for students and staff, and as such, hold personal and other data that relate to quality of teaching, quality of feedback given to students, engagement of students in forums, quizzes, and formative and summative assessments.
- Course areas are retained from the end of academic year in which the student relationship with relevant programme (or last action in a case extending post-graduation) ends, plus 6 years, then deleted.

- In practice, based on a typical UG programme being 3 years, course areas are deleted after current year plus 9 years.
- Notices are posted in learn.gold to alert staff to the deletion of oldest materials during the summer.
- CoSector run reports in the form of spreadsheets to identify course areas that fall within the policy's parameters
- TaLIC approve the deletion based on these spreadsheets

### **Data/materials held in non-course areas**

- These include programme pages, areas relating to student success, and sandpit areas created for staff. They are not part of annual course creation, are created on request from individual members of staff, and remain in perpetuity as static pages in learn.gold.
- Yearly reminders to update content are sent out in the summer starting 2 years after the area was created
- Owners of areas that have not been updated or accessed for over 2 years are contacted to discuss options and timescales for updating or deletion. If no contact is made, pages will be deleted after 3 years of no access or updating.
- Sandpit pages owned by users who have left the university will be deleted

### **Archive of records of deleted materials**

- The spreadsheets will serve as an archive of the deleted users and course pages and will be held by TaLIC

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## **5 Roles and Responsibilities**

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1. CoSector will identify the users and course pages to be deleted from learn.gold and will provide these lists to TaLIC for approval by the Business Owner.
2. CoSector will be responsible for the management of data as part of their hosting agreement.
3. TaLIC will be responsible for communicating changes to the policy to staff, and for notices about deletions of materials via learn.gold pages.
4. Academic staff will be responsible for annual updating of the learning materials held in their pages through the rollover process
5. TaLIC will be responsible for managing audit requests from e.g. the OfS.

### **Document history**

<b>Version</b>	<b>Date</b>	<b>Details</b>	<b>Author</b>	<b>Approved</b>
1.0	15/07/2025	Approved	Fiona Handley	Executive Board