
THE AGA KHAN UNIVERSITY

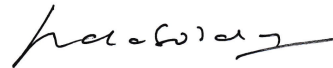
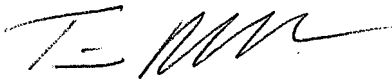
COLLECTION, RETENTION, USE AND CONFIDENTIALITY OF STUDENT INFORMATION AND RECORDS POLICY & PROCEDURES

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Responsible Authority:

Policy Authority:



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1.0 INTRODUCTION

- 1.1 Aga Khan University (AKU) collects and maintains student information and records to support its academic mission, ensure effective academic and financial administration, comply with legal and regulatory requirements, and safeguard the rights and interests of students and AKU.
- 1.2 AKU is committed to taking every reasonable step to protect the confidentiality, privacy, integrity and security of student information and records, while enabling their appropriate use for academic, administrative and legal purposes.

2.0 PURPOSE

2.1 The purpose of this policy is to:

- 2.1.1 Establish principles and requirements governing the collection, use, access, disclosure, retention and confidentiality of student information and records at AKU.
- 2.1.2 Clarify the rights of students with respect to their information and records, including rights of access and correction.
- 2.1.3 Define the responsibilities of the Office of the Registrar and other AKU offices/Academic Entities in handling student information and records.
- 2.1.4 Ensure that AKU's practices comply with applicable laws and regulations in the jurisdictions in which AKU operates.

3.0 SCOPE AND JURISDICTION

3.1 This policy applies to all AKU offices, including the Office of the Registrar, and Academic Entities that collect, create, receive, store, use, or disclose Student Records/Information for academic, administrative, or support purposes.

3.2 This policy applies to:

- 3.2.1 All applicants, admitted, current and former students of AKU; and
- 3.2.2 All student information and records, in any form or medium (electronic, paper or other), held by AKU.

3.3 This policy applies to all AKU campuses and teaching sites, in all countries where AKU operates.

3.4 When necessary for AKU operations, student records/information may be transferred across borders in compliance with applicable laws and with appropriate safeguards.

3.5 In the event of a conflict between this policy and any applicable law or regulation, the requirements of the applicable law or regulation will prevail. This policy will be interpreted and applied in a manner consistent with such requirements.

4.0 KEY PRINCIPLES

4.1 **Legitimacy and necessity:** Student information will be collected, used and retained only for legitimate academic, administrative, research, support and legal purposes, and only to the extent necessary to fulfil those purposes.

4.2 **Transparency:** Students will be informed, in an appropriate manner, of the purposes for which their information is collected, the legal basis for any mandatory collection, and the circumstances in which their information may be disclosed.

4.3 **Confidentiality and privacy:** AKU will take reasonable steps to protect the confidentiality and privacy of student information, including limiting access to authorised personnel on a need-to-know basis and using appropriate safeguards.

4.4 **Accuracy and integrity:** Student Records will be maintained as accurate, complete and up to date as reasonably possible.

4.5 **Student rights:** Students have rights of access to their own records, subject to limited exceptions, and to request correction of erroneous information.

4.6 **Compliance with law:** Where collection, use or disclosure of student information is required by law or by competent authorities, AKU will comply with such requirements in a manner that is consistent with this policy and any consultation with legal counsel.

4.7 **Accountability:** The Office of the Registrar is the primary custodian of Student Records

and is responsible for ensuring that this policy and related procedures are implemented and communicated.

5.0 COLLECTION OF STUDENT INFORMATION

- 5.1 By applying for admission to AKU and by enrolling in a programme, students accept the right of the Office of the Registrar to collect pertinent personal and related information needed to:
 - 5.1.1 Establish and maintain a record of their academic progress and performance;
 - 5.1.2 Provide the basis for academic awards, financial aid and other entitlements;
 - 5.1.3 Administer the academic and financial affairs of AKU; and
 - 5.1.4 Comply with legal and regulatory requirements.
- 5.2 Documentation submitted by students in support of applications for admission, residence accommodation, financial assistance, petitions, appeals or other AKU processes becomes the property of AKU and will not be returned.
- 5.3 Where collection of specific personal and/or related information from students is required by law, the Office of the Registrar is responsible for the collection of such data and for informing students of:
 - 5.3.1 The legal basis and purpose of the collection;
 - 5.3.2 The types of information to be collected; and
 - 5.3.3 Any consequence of failure to provide the required information.
- 5.4 Students enrolled in an AKU Programme must ensure that the required information is provided to the Office of the Registrar within the timelines specified.
- 5.5 Where a student is under the age of majority, the student's parent or guardian must ensure that the required information is provided.
- 5.6 The Office of the Registrar collects only such information as is reasonably necessary for the purposes outlined in this policy or as required by law.

6.0 CONFIDENTIALITY, USE AND DISCLOSURE OF STUDENT INFORMATION

- 6.1 AKU is committed to taking every reasonable step to protect the confidentiality and privacy of student information and records.
- 6.2 Student information and records are used only for legitimate academic, administrative, support and legal purposes, including:
 - 6.2.1 Academic advising, registration, progression and graduation;
 - 6.2.2 Financial aid, scholarships, tuition and fees administration;
 - 6.2.3 Student services and support;
 - 6.2.4 Institutional planning, quality assurance and reporting; and
 - 6.2.5 Compliance with legal and regulatory obligations.
- 6.3 Except as expressly permitted under this policy, the Office of the Registrar will not disclose the confidential contents of student records to any person or entity outside AKU.

Disclosure outside AKU

- 6.4 Subject to consultation with AKU's legal counsel and/or other relevant officers, the Office of the Registrar may disclose the confidential contents of Student Records to a party outside AKU where the student has provided prior written authorization, specifying the information to be disclosed and the recipient.
- 6.5 Notwithstanding clauses 6.3 and 6.4, student information and records may be used or disclosed where required by applicable laws, regulations, court orders or the lawful

requirements of competent authorities. Any such disclosure will be coordinated by the Office of the Registrar and undertaken following consultation with the AKU's legal counsel.

- 6.6 Notwithstanding the above, the Office of the Registrar may, where appropriate and consistent with applicable law, confirm a limited set of non-confidential information in response to inquiries, namely:
- 6.6.1 a student's active registration status;
 - 6.6.2 current field of study; and
 - 6.6.3 degree(s) conferred by AKU and date(s) of conferral.

Internal access (employees)

- 6.7 Employees of AKU are permitted access to information contained in Student Records only if they need to know the information to perform their official duties.
- 6.8 Normally, only employees involved in academic administration, student affairs or related functions may access the contents of Student Records.
- 6.9 Access to regional or national identification numbers is restricted and must be explicitly justified by function and authorised by the Registrar or delegate.

Electronic records and retention

- 6.10 An electronic record of students' academic achievements at AKU is preserved permanently. Other documentation contained in student files may be destroyed when no longer required, in accordance with the Retention of Student Records Guidelines (See Annex C).

7.0 STUDENT RIGHTS OF ACCESS AND CORRECTION

- 7.1 Students have the right to inspect all documents contained in their own Student Record, with the exception of:
- 7.1.1 Evaluations and letters of reference supplied to AKU with the understanding that they be kept confidential; and
 - 7.1.2 Any documents or information that AKU is legally required or permitted to withhold.
- 7.2 Students have the right to request correction of erroneous information contained in their records. Where information is corrected, the Office of the Registrar will, where practicable, advise recipients of any information previously found to be in error.
- 7.3 Students wishing to inspect their record must follow the procedures set out in Annex B.

8.0 LEGAL REQUIREMENTS AND COMPLIANCE

- 8.1 Where AKU is required by law to collect, use or disclose student information, the Office of the Registrar will:
- 8.1.1 Coordinate the collection, use or disclosure;
 - 8.1.2 Ensure that students are apprised of the requirement and its implications, where appropriate; and
 - 8.1.3 Limit distribution of the information within AKU to offices that require access to fulfil the legal or administrative purpose.
- 8.2 The Office of the Registrar will make all reasonable efforts and take precautions to maintain the confidentiality of student information collected pursuant to legal requirements, consistent with the need to comply with such requirements.
- 8.3 Requests for disclosure of student information by external authorities (e.g., courts,

regulatory bodies, law enforcement) must be handled in accordance with Annex B and, where appropriate, in consultation with AKU's legal counsel.

9.0 ROLES AND RESPONSIBILITIES

9.1 The Academic Council/Senate approves this policy and any substantive amendments.

9.2 The Office of the Registrar is responsible for:

- 9.2.1 Acting as custodian of official Student Records;
- 9.2.2 Implementing and communicating this policy and related procedures;
- 9.2.3 Ensuring that collection, use, disclosure and retention of student information comply with this policy and applicable laws; and
- 9.2.4 Determining and authorising access to Student Records by AKU staff and external parties, consistent with this policy.

9.3 AKU employees are responsible for:

- 9.3.1 Maintaining the confidentiality and security of student information;
- 9.3.2 Accessing and using such information only for legitimate work-related purposes; and
- 9.3.3 Complying with this policy, related procedures and any other applicable AKU policies on privacy, data protection and information security.

9.4 Students are responsible for:

- 9.4.1 Providing accurate and complete information to AKU;
- 9.4.2 Updating their personal information as necessary;
- 9.4.3 Providing any information required by law within specified timelines; and
- 9.4.4 Using their access to AKU's systems and records in a responsible and lawful manner.

10.0 NON-COMPLIANCE AND CONSEQUENCES

10.1 Failure by students to provide information that is required by law or by AKU within the specified timelines may result in one or more of the following actions:

- 10.1.1 Registration blocked;
- 10.1.2 Examination results withheld;
- 10.1.3 Final results withheld;
- 10.1.4 Transcripts withheld;
- 10.1.5 Degree, diploma or certificate parchment withheld; and/or
- 10.1.6 Discipline under the *Student Code of Conduct & Disciplinary Procedures*

10.2 Breach of this policy by AKU employees may result in disciplinary action in accordance with applicable human resources policies and procedures.

11.0 APPEALS

11.1 A student who disagrees with a decision of the Registrar regarding access to, or disclosure of, a Student Record may appeal to the provost (or delegate).

11.2 The decision of the provost or delegate on the matter will be final and binding.

12.0 POLICY REVIEW

12.1 This policy and procedures will be reviewed at least every three years, or earlier if required by regulatory changes or institutional priorities.

ANNEX A – DEFINITIONS

Term	Definition
Academic Entity	Any academic unit, including a faculty, school, college, institute, department or division, authorised by AKU to offer academic programmes.
Applicable Law	Any law, regulation, rule, directive, court order or other legal requirement that applies in a jurisdiction in which AKU operates.
Competent Authority	Any court, regulatory body, government agency, law enforcement body or other authority legally empowered to require AKU to collect, use or disclose student information.
Confidential Information	Student information or records that are not publicly available and that are protected from unauthorised access, use or disclosure by this policy, by other AKU policies or by law
Office of the Registrar	The AKU office, and its designees in each region or campus, responsible for admissions, registration, academic records, and related student administrative services.
Parent/guardian	A parent, legal guardian or other person legally authorised to act on behalf of a student who is under the age of majority in the relevant jurisdiction.
Personal Information	Information about an identifiable individual, including but not limited to name, contact details, date of birth, identification numbers, academic record, financial information and other information defined as personal under applicable laws.
Programme	An approved course of study leading to an AKU credential (e.g., degree, diploma, certificate, residency/fellowship).
Record and University Record	<p>Any record of information however recorded, whether by electronic means or in print form that is capable of being produced from a machine-readable record under the control of AKU by means of computer hardware and software or any other information storage equipment and technical expertise normally used by the institution.</p> <p>University records are those within AKU's custody or control. They include records relating to AKU's operation and administration, and records containing information relating to individual faculty, staff, and students.</p>
Shredding of Records	Where records are not transferred to archives, paper records must be shredded, not simply bundled for or placed in the trash. Measures

must be taken to ensure that electronic records are completely erased.

Student

Any individual who is or has been registered in a programme or course of study at AKU.

Student Information

Any personal or related information about a student that is collected, created, received or held by AKU in connection with admission, enrolment, academic progress, financial matters, student services, or compliance with legal or regulatory requirements.

Student Record

Any recorded information related to a student, in any form or medium (including electronic and paper), held by AKU, including but not limited to application materials, registration information, academic performance, disciplinary records, financial records and correspondence.

ANNEX B – COLLECTION, USE AND CONFIDENTIALITY OF STUDENT INFORMATION AND RECORDS PROCEDURES AND APPEAL OF DECISIONS

PART 1. COLLECTION OF STUDENT INFORMATION

- 1.1 At the time of application and admission, the Office of the Registrar will:
- 1.1.1 Specify, in application and admission materials, the information to be collected from applicants and the purposes for which it will be used;
 - 1.1.2 Indicate where information is required by law or AKU regulation; and
 - 1.1.3 Inform students of any consequences of failing to provide required information.
- 1.2 During enrolment and registration, the Office of the Registrar will:
- 1.2.1 Collect any additional information needed for academic, administrative, financial or legal purposes;
 - 1.2.2 Where information is legally mandated, clearly identify the legal requirement and any associated timelines; and
 - 1.2.3 Where a student is under the age of majority, ensure that communications regarding required information explicitly inform the parent/guardian of their responsibility to provide such information.
- 1.3 The Office of the Registrar will ensure that:
- 1.3.1 Only information necessary for the specified purpose is collected; and
 - 1.3.2 Information is recorded accurately and stored in approved AKU systems or files.

PART 2. NOTIFICATION TO STUDENTS

- 2.1 When collection of specific information is required by law, the Office of the Registrar will issue a written notice (which may be electronic) to affected students that:
- 2.1.1 Identifies the legal requirement and the authority under which information is collected;
 - 2.1.2 Specifies the information to be provided;
 - 2.1.3 States the deadline for submission; and
 - 2.1.4 Describes potential consequences of non-compliance.
- 2.2 Notices may be issued via official AKU email, student portals, and/or other approved communication channels.

PART 3. HANDLING REQUESTS FROM COMPETENT AUTHORITIES

- 3.1 These procedures operationalise the Policy and do not create additional rights or obligations.
- 3.2 Any request from a competent authority (e.g., court, government agency, law enforcement) for student information must be forwarded to the Office of the Registrar without delay.
- 3.3 The Office of the Registrar will:
- 3.3.1 Verify the identity and authority of the requesting body;
 - 3.3.2 Review the request for legal sufficiency and scope, consulting AKU's legal counsel as required by the Policy;
 - 3.3.3 Ensure that disclosure is limited to information that is specifically required; and
 - 3.3.4 Record details of the request, the information disclosed and the legal basis for disclosure.

3.4 Where legally permissible and appropriate by the Registrar, students may be informed that information about them has been requested or disclosed.

PART 4. INTERNAL ACCESS BY AKU EMPLOYEES

4.1 Access to Student Records by AKU employees is granted strictly on a need-to-know basis, consistent with assigned duties.

4.2 Supervisors or heads of unit must ensure that:

4.2.1 Staff who require access to student information are authorised by the Office of the Registrar;

4.2.2 Staff receive appropriate training on confidentiality and privacy; and

4.2.3 Staff understand that misuse or unauthorised disclosure of student information may lead to disciplinary action.

4.3 Requests for access beyond routine functional access must be submitted in writing to the Office of the Registrar, with justification.

4.4 Access to regional or national identification numbers, or other highly sensitive data, is restricted and must be explicitly approved by the Registrar or delegate.

PART 5. STUDENT ACCESS TO THEIR RECORDS

5.1 A student wishing to inspect their record must:

5.1.1 Submit a request, in person or in writing, to the Office of the Registrar at their campus; and

5.1.2 Provide appropriate identification to verify their identity.

5.2 The Office of the Registrar will:

5.2.1 Arrange an appointment for the student with the designated staff member;

5.2.2 Provide access to the student's record in a secure setting;

5.2.3 Exclude from inspection evaluations or letters of reference supplied with an expectation of confidentiality, and any other information that AKU is legally required or permitted to withhold; and

5.2.4 Record that access was provided, including date, time and staff member present.

PART 6. CORRECTION OF RECORDS

6.1 A student who believes that their record contains erroneous information may submit a written request for correction to the Office of the Registrar, identifying the specific information and the proposed correction, and providing supporting documentation where applicable.

6.2 The Office of the Registrar will:

6.2.1 Review the request and supporting information;

6.2.2 Consult relevant offices (e.g., academic departments, finance) as needed;

6.2.3 Decide whether to amend the record; and

6.2.4 Inform the student in writing of the outcome and any changes made.

6.3 Where information is corrected, the Office of the Registrar will, where practicable, inform recipients of information previously found to be in error.

PART 7. NON-COMPLIANCE BY STUDENTS

- 7.1 These procedures operationalise the Policy and do not create additional rights or obligations.
- 7.2 If a student fails to provide information required by law or by AKU regulation within the specified timelines, the Office of the Registrar will:
- 7.2.1 Issue at least one reminder notice to the student (and, where relevant, to the parent/guardian);
 - 7.2.2 Set a final deadline for compliance; and
 - 7.2.3 Notify the student in writing of the actions that may be taken in case of continued non-compliance.
- 7.3 Where a student remains non-compliant after the final deadline, AKU may implement one or more of the following actions, as appropriate:
- 7.3.1 Block registration for subsequent terms;
 - 7.3.2 Withhold examination results;
 - 7.3.3 Withhold final results;
 - 7.3.4 Withhold official transcripts; and/or
 - 7.3.5 Withhold degree, diploma or certificate parchments.
- 7.4 Actions taken under 7.2 will be recorded in the student's administrative record.

PART 8. APPEALS ABOUT ACCESS TO, OR DISCLOSURE OF, STUDENT RECORDS

- 8.1 A student may submit a written appeal to the Provost (or delegate) within 10 working days of receipt of a decision from the Office of the Registrar, stating the reasons for the disagreement.
- 8.2 The Provost (or delegate) may seek additional information from the Office of the Registrar or other relevant offices.
- 8.3 The Provost (or delegate) will consider the reasons of both the student and the Office of the Registrar.
- 8.4 The Provost's decision will be communicated in writing to the student within 10 working days of receiving the appeal, and the decision will be final.

PART 9. RETENTION AND DISPOSAL OF RECORDS

- 9.1 The Office of the Registrar will ensure that:
- 9.1.1 An electronic record of students' achievements at AKU is preserved permanently; and
 - 9.1.2 Other documentation in student files is retained and disposed of in accordance with the Retention of Student Records Guidelines (Annex C).
- 9.2 Disposal of Student Records will be carried out in a manner that protects confidentiality (e.g., secure shredding of paper records, secure deletion of electronic records).

ANNEX C– RETENTION OF STUDENT RECORDS GUIDELINES

1.0 PURPOSE

- 1.1 These guidelines outline the duration, responsibilities, and physical site for the retention of Student Records.
- 1.2 These guidelines will be read in conjunction with the Collection, Use and Confidentiality of Student Information and Records Policy & Procedures.
- 1.3 Use of, access to and retention of Student Records not specifically addressed in these Guidelines should be referred to the University Registrar.
- 1.4 Where these Guidelines conflicts with national legislation, that legislation will take precedence over these Guidelines.

Data Element	Length	Responsibility / Place of Retention (for physical or/and online records)
Academic Entity Relevant Admission Committees minutes	For the duration of a programme i.e. until the relevant class graduates.	Admission Office and Concerned Programme Office
Academic Entity Admission Committee selection process as approved by Registrar’s Working Group (RWG).	Indefinite	Recorded as RWG Minutes by Academic Secretariat
Academic Entity admission test question paper.	Indefinite	One ‘archive’ copy retained by the Registrar. Used and unused copies shredded/incinerated.
Academic Entity admission test applicant response sheets	Upon the start of the relevant academic year.	Admission Office
Online Application form for selected students for admission and correspondence.	Becomes part of student file	Custodian: Records Office
Convocation booklet	Indefinite	One "archive" copy retained in the Registrar's Office.
Degree / diploma parchment database	Indefinite	Degree Custodian Office
Online Application form for admission submitted by unsuccessful applicants.	Indefinite (Online)	Admission Office

Data Element	Length	Responsibility / Place of Retention (for physical or/and online records)
Degree / diploma parchment, uncollected by graduate or withheld by the University. Maintained with each country Registrar Office	Indefinite	Pakistan and UK: Degree Custodian Office in Karachi East Africa: Country's Registrar Office
Degree / diploma parchment, misprints and parchments of students who did not graduate with the class.	Notation of serial number in logbook, then shredding	Degree Custodian Office
Examination papers / scripts / assignments – (for onboard students)	One year	Exam Cell or Relevant Programme Office
Grade reporting / submission records (grade rosters)	Until students' graduate	Relevant Programme Office and Records Office
Grade change requests	Kept for the duration of the programme of a student	Records Office
Medical College elective records (onboard students)	Becomes part of the student file	Records Office
Medical excuse notes / certificates	Becomes part of student file	Records Office
Minutes / records: University academic-related committees (e.g., Academic Council, Registrar's Working Group)	Indefinite	Academic Secretariate
Minutes / records: All Appeals and Academic Integrity Committee	Indefinite	Records Office
Minutes / records: Academic Disciplinary Committees	Indefinite	Entity's Dean Office
Minutes / records: Non-academic Disciplinary Committees, File Note and Decision Letter	Indefinite	Student Experience Office
Non-academic Disciplinary Committees File Note and Decision Letter	Became part of student file	Records Office
PMDC/PNMC and other regulatory body student registration / certification record	Ten years after graduation or last attendance	Records Office

Data Element	Length	Responsibility / Place of Retention (for physical or/and online records)
Student academic records / files, hard copy	Ten years after graduation or last attendance	Records Office
Student name change request forms for parchments / transcripts.	Part of student file	Records Office
Student records, database	Indefinite	Records Office
Thesis / dissertation records	Indefinite	Programme Office/ library
Transcript paper serial numbers	Indefinite	Academic Secretariate
Transcripts in AKUROSS/DMS	Indefinite	Records Office
Transcripts, misprints	Notation of serial number in logbook, then shredding	Records Office (Individual Responsible for Transcript Printing)
Verification / certification of records request forms	Upon completion of Process by the Issuing Authority	Records Office
Alumni database	Indefinite	As per the policy of Advancement Office