



Iona COLLEGE
TRINITY

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Records Management Policy and Procedure

Approved by the Board of Directors on 22 September 2022

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1. Purpose

This Policy explains how Iona Trinity College of Higher Education (**the College**), manages, stores, retrieves and disposes of records.

2. Scope

This Policy applies to:

- all staff (full-time, part-time, casual or contract)
- contractors and consultants providing services to the College
- members of the College's governing bodies, and
- all records the College creates, including paper-based and electronic records.

3. Policy

3.1 Policy statement

This Policy aims to establish, effective and transparent processes in line with sector standards related to corporate governance to create, manage, store, retrieve and dispose of records at the College.

This policy aligns with the requirements set forth in the Privacy Act 1988, ensuring that all personal information is managed in compliance with Australian Privacy Principles

3.2 Principles

In accordance with the Privacy Act 1988, personal information collected during records management will only be used for the purposes outlined in our Personal Information and Privacy Policy.

The creation, management, storage, retrieval and disposal of records at the College will be guided by the following principles:

- Important records on a range of the College's activities are generated including on teaching, students, staff, finances and business administration. The College will implement good practice in the creation, management, retrieval, security, and disposal of such records through this Policy and Procedure
- Privacy and risk mitigation are fundamental considerations in the management of all corporate and personnel records
- Access to all records is restricted to authorised staff with a business process requirement
- Record management training will be given to new staff at induction.

The following principles govern the collection, management, storage of data:

- Data is collected only:
 - To support the College's operational activities
 - To inform quality improvement, risk management and strategic planning
 - To meet external reporting requirements
- All College staff are responsible for collection of accurate and complete data

- Personal data collected by the College will be managed responsibly
- Data is protected from unauthorised access and modification
- Data is only made available to third parties in accordance with legal and regulatory requirements.

4. Procedure

4.1 Record management process

All records containing personal information will be stored securely, consistent with the Privacy Act 1988, to prevent unauthorised access or disclosure.

Records will be retained and disposed of in compliance with the Privacy Act 1988, ensuring that personal information is handled responsibly and in a timely manner

The following processes will be followed to create, record, store, archive and dispose of information at the College.

Record Creation and Capture	<p>All staff are required to maintain accurate records of all activity for which the College may be held accountable and integrate these records within the College's records management system in compliance with this Policy and Procedure.</p> <p>All documents must be marked with version control including date of record creation / update</p>
Record Storage, Archiving and Disposal	<p>In determining appropriate storage for current and non-current records, consideration must be given to the protection provided by any selected storage facility, sensitivity of records, required retention periods as well as access requirements and demands.</p> <p>Staff are responsible for applying adequate security measures for the access and use of records in accordance with legislative, regulatory or business requirements.</p> <p>Records should be accessible on a 'need-to-know' basis and security arrangements should provide for reasonable protection and detection of breaches.</p> <p>Staff must not relinquish, amend, destroy or damage records belonging to the College without approval from the Principal.</p> <p>Records will be retained for a period determined by the type of record:</p> <ul style="list-style-type: none"> • Business records – A minimum of 7 years • Staff records – A minimum of 5 years after the staff has ceased employment at the College • Student records will be retained indefinitely and securely archived after two years to enable students to request access to their records.

Record Security and Data Protection	<p>The security of records is established through electronic back-up, and/or secure storage on-site or off-site in an area where records are protected from damage and incursion but may be retrieved as required and authorised.</p> <p>Measures for the prevention of unauthorised access, disclosure or alteration of personal, sensitive or otherwise confidential information include the following controls:</p> <ul style="list-style-type: none"> • Access to student and staff records are to be provided only on a 'need-to-know' basis • Third party access to personal information is limited to what is permitted under this Policy and Procedure • Physical records are stored in secured areas or secured cabinets • Contracts with external parties which may access or be provided with the College's records will include relevant legal provisions in their contracts about the College's records management requirements and processes.
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4.2 Categorisation of records

Records are categorised as highlighted in the table below.

Business Records	<p>Business records are records of everyday business activities carried out at the College which includes, but are not limited to:</p> <ul style="list-style-type: none"> • Formal communications between the College staff and internal and external bodies • Formal communications between staff and students • Policy decisions and amendments including procedural changes • Transactions conducted on behalf of the College with internal or external parties, including financial transactions.
Marketing Records	<p>Marketing records promote the College, its learning resources and environment, staff and courses to prospective students. Information developed for this purpose is used for the website, the student handbook and brochures, and will be retained for two years.</p>
Student Records	<p>As required by this Policy, student records are accessible only on a 'need-to-know' basis. Therefore, only the Principal and staff from Student Services will have access to these student records.</p> <p>Student records include, at a minimum:</p> <ul style="list-style-type: none"> • Application and certification documentation, including application for recognition of prior learning • Enrolment data

	<ul style="list-style-type: none"> • Financial transactions (e.g. receipts of payments made by students under a written agreement) • Academic results and progress information • Formal communications to students (e.g. written agreements, requests for transfers) or between staff and students, and • Any incidents involving individual students such as complaints/appeals, allegations of misconduct and breaches of academic integrity, and critical incidents <p>Student records must be stored securely for a minimum of 2 years after the student ceases to be an accepted student of the College (either through graduating, transferring to another provider or withdrawing from the College's course). After this 2-year period, student records will be retained indefinitely, so students can request additional copies.</p>
Staff Records	<p>At commencement, a staff file will be allocated to a recently engaged staff. The staff file must contain, at a minimum:</p> <ul style="list-style-type: none"> • Certified qualification • Curriculum Vitae • Appointment details • Documentation in relation performance reviews <p>Staff records will also include staff payments, taxation, superannuation and any associated financial activity between the College and the staff</p> <p>As required by this Policy, staff records are accessible only on a 'need-to-know' basis.</p> <p>Staff can request access to their records at any time during their employment.</p>

5. Responsibilities

The Board of Directors and the Principal have overall responsibility for record management.

Managers of their respective area (e.g. human resources or student services) have responsibility for records management in their business area.

Staff involved in records management will receive training on the Privacy Act 1988 and the importance of protecting personal information.

6. Definitions

There are no definitions in this Policy and Procedure.

7. Version history

Version #	Changes	Approval Body	Approval Date
1.0	Original version	Board of Directors	23/06/22
2.0	Strengthen alignment with the National Code requirements on keeping records	Board of Directors	22/09/22
2.1	Inserted provisions to ensure compliance with the Privacy Act 1988.	Board of Directors	04/10/22

8. Additional Information

Policy Status	Approved
Policy Owner	Principal
Next Review Date	3 years from Approval Date
Associated Internal Documents	Personal Information and Privacy Policy and Procedure
Higher Education Standards Framework (Threshold Standards) 2021	Standard 7.3.3
National Code of Practice for Providers of Education and Training to Overseas Students 2018	Standard 2.4, 3.6, 6.8, 7.7 and 10.2.7
Other Applicable Legislation and Instruments	Privacy Act 1988 Tertiary Education Quality and Standards Agency Act 2011

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