POLICY	ACADEMIES AUSTRALASIA POLYTECHNIC

Ref. to Legislative Frameworks: HESF2015: Standard 7.3.1 / 7.3.2 / 7.3.3 SRTO2015: Standard 3.6 / 8.5 National Code 2018: Standard 3 / 6 / 7 / 8 / 9 / 10 Retention and Disposal Authority for Records of the Higher and Further Education Functions 2019 Reference 1 / 2 / 4 / 5	**Records Management**	
Version: 3.0	Approved by: Chief Executive Officer	Approved on:　17/12/2019 Review by:　　17/12/2021

Revision History

Version	Description of Change	Policy Author(s)	Effective Date
3.0	Updated reference from the Retention and Disposal Authority for Records of the Higher and Further Education Functions Update retention duration for both HE and VET assessments	CEO and Compliance Manager	17/12/2019
2.0	Update to the Schedule of Records Retention and Disposal	CEO	1/08/2018
1.3	Policy and procedure review	CEO	31/03/2018
1.2	Added references to National Code 2018	Quality Assurance Support Officer	20/01/2018

PURPOSE

This policy specifies the requirements for creation, care and management of student data and information for students enrolled at Academic Australasia Polytechnic (AAPoly). The purpose of this policy is to define the process of managing student records, in line with the requirements of the Retention and Disposal Authority for Records of the Higher and Further Education Functions 2019, the Standards for Registered Training Organisations (RTOs) 2015 and the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

ASQA's General Direction requires AAPoly to securely retain for a period of six months from the date on which the judgment of competence for the student was made all completed student assessment items for each student and be able to produce that in full at audit if requested to do so.

The ESOS Act Section 21 requires AAPoly to keep the following student details records at all times:

- a) the student's current residential address;
- b) the student's mobile phone number (if any);
- c) the student's email address (if any); and
- d) any other details prescribed by the regulations.

POLICY STATEMENT

Information systems and records are managed securely and confidentially by:

- a) maintaining accurate and current records of enrolments, progression, completions and award of qualifications.
- b) preventing unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic or research integrity.
- c) documenting and recording responses to formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents.

SCOPE

This policy applies to data, information and records whether received, created, maintained, copied, disseminated, legally filed or disposed of by AAPoly in relation to students. It also applies to electronic records, including database, electronic mail, audio recording and other forms of work completed by or on behalf of AAPoly in any format.

The Records Management Policy applies to all AAPoly staff involved in managing student records in all courses delivered by AAPoly.

POLICY GUIDELINES AND PRINCIPLES

1. AAPoly will manage its records in compliance with the legislative requirements.

2. As a registered education provider in the state of Victoria, the retention and disposal schedule of AAPoly records are harmonized with Public Record Office Victoria's Retention and Disposal Authority Records of Records of the Higher and Further Education Functions.

3. AAPoly will manage its student records throughout their lifecycle to ensure that they are complete, accurate and remain the property of AAPoly. Exception applies to records classified as 'public record', which is subject to the requirements in Public Records Act 1973.

4. All department heads are to ensure that information classified as public records handled by their relevant departments are stored in accordance with legislative requirements.

5. All intellectual material, official working papers and correspondence, data and information held by AAPoly and/or developed and/or used by employees and other people in their official capacity, belong to AAPoly. Unless agreed otherwise in advance, such records are considered to be AAPoly's asset, is subject to this policy and should be stored and disposed of appropriately.

6. Records in the form of audio recording must not be stored in the format that is easily editable (for example, an audio file should be password protected or be kept in a restricted folder in AAPoly secure server).

7. AAPoly records belong to AAPoly as an organisation and not to any individual or administrative part of AAPoly. Individuals are entrusted with the custody of these records and are expected to manage them appropriately. Under no circumstances are records to be accessed or used for business unrelated to AAPoly.

8. Staff members ensure that they preserve the integrity, confidentiality, availability and authorised access to the student information.

9. Staff members should do everything in their power not to lose information entrusted to them, and not to disclose sensitive/confidential information with unauthorised parties.

10. Staff members will be provided with access to student data and information only in accordance with the requirements of their particular roles. AAPoly staff must ensure that their usernames and passwords for the systems including the Student management system are kept secure and not shared with other people under any circumstances. Only the CEO and the IT Manager are privy to the usernames and passwords, with proviso that such access privilege is used only in critical circumstances.

11. All hard copy records are to be stored in compliant storage areas within the relevant department while the record is being used for daily business activities, or (for inactive hard copy records) at the official off-site storage facility. Staff members in supervisory

capacity are responsible to ensure these hard copy files are stored securely and accessible only by authorized persons.

12. The disposal of records must be completed as outlined in the pursuant procedures. Records **may not be destroyed** if they are related to any current or anticipated investigation, legal action or proceeding, litigation, audit or program review.

13. Transfer of records requires appropriate procedures to ensure tracking of data and information.

14. The CEO is the only person who can authorise (in writing) the destruction of records. Records will only be authorised for destruction after the retention period has lapsed. Documents identified for destruction are shredded, before being recycled. The archive register will be updated to identify that a particular record has been destroyed.

15. When an employee leaves a position, all student records under the control of that employee (including those in shared spaces) should be dealt with in line with this policy. Some records may be disposed of immediately, but some will need to be retained to ensure no interruption to the operation of AAPoly or for legal reasons. In this case, the records may need to be transferred to another employee, into the office's filing system or to a compliant storage location. The pursuant procedures must be followed to ensure that any AAPoly records in the possession of employees at the time of separation are managed properly and that important information is not inadvertently destroyed or made public.

RESPONSIBILITIES

1. The Chief Executive Officer (CEO) of AAPoly is responsible for ensuring that AAPoly complies with the law governing records management including:

   a. Retention and Disposal Authority for Records of the Higher and Further Education Functions 2019
   b. Higher Education Standards Framework 2015
   c. Standards for National Registered Training Organisations 2015
   d. Information Privacy Higher Education Support Act 2003 (Cth)
   e. Health Records Act 2001 (Vic)
   f. Education Services for Overseas Students Regulations 2019
   g. Financial Management Act 1994 (Vic)
   h. Freedom of Information Act 1982 (Vic)
   i. Public Records Act 1973
   j. Crimes Act 1958 (Vic)
   k. The CEO also authorises (in writing) the destruction of records. The CEO also receives and acts on any notifications of alleged breaches of the Records Management Policy and Procedure.

2. Heads of Departments are responsible for communicating this policy to the members of their teams. They should also role model, monitor and support positive recordkeeping practices within their respective work areas.

3. The Head of Student Services (SS) is also responsible for ensuring all records outlined in this prolicy are retained and stored safely and securely, and are ready upon request.

4. The Head of SS and IT Manager are responsible for retention, management and disposal of records and ensure technology used to retain records is effectively managed, and electronic records are securely stored and backed up.

5. The Head of VET and the Academic Dean of Higher Education ensures that student academic records are appropriately gathered during and at the completion of the course and are suitably bundled, which includes the following:
   a. Ensure student records are fully completed with sufficient information recorded by Trainers/Assessors/Lecturers to allow an independent review of the assessment decision by a third party.
   b. Record, in detail, the interpretation of assessment evidence with suitably detailed comments to support their assessment decision.
   c. Monitor the sufficiency of records storage and handling and propose opportunities for improvement in accordance with the continuous improvement policy as required.
   d. Use authorised AAPoly records only to record student progress and the outcomes of assessment activities.

FEEDBACK

Please contact the CEO through email suggestionstotheceo@aapoly.edu.au to convey any queries or feedback about this policy. The CEO will respond in writing to the query or feedback within two weeks after the query or feedback is received, unless in an urgent or extenuating circumstance when an immediate response is required. The query or feedback and the response will be recorded in the Continuous Improvement register and utilised in the future review of the policy and procedure.

References

Soure	Document Title	Version/Date
Internal	AAPoly Records Management Procedure	v 3.0 17122019
	Information Privacy Policy and Procedure	v 2.3 20012018
External	ASQA Standards for Registered Training Organisations	2015
	Deakin University Information and Records Management Policy	N/A (accessed 27 February 2017)
	Federation University Records Management Policy	IM _1695 (accessed 27 February 2017)
	Higher Education Standards Framework	2015
	National Code of Practice for Providers of Education and Training to Overseas Students	2018
	Public Record Office Victoria's Retention and Disposal Authority - Records of the Higher and Further Education Functions	PROS16/07/19122016
	RMIT University Document and Records Management Policy	N/A (accessed 27 February 2017)
	Retention and Disposal Authority for Records of the Higher and Further Education Functions	2019