

RECORDS AND INFORMATION MANAGEMENT POLICY AND PROCEDURE

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Policy Lead	Chief Executive Officer / Principal
Approving Authority	Board Of Directors
Approval date	28 June 2024
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Version	2024.1
Relevant legislation or external requirements	<p>National Code of Practice for Providers of Education and Training to Overseas Students 2018 (NC: 2.4, 3.6, 6.5, 6.8, 7.7, 8.8, 9.1, 9.5, 10.2) Higher Education Standards Framework (Threshold Standards) 2021 (HESFs: 1.2, 1.5, 2.1, 2.3, 2.4, 6.1, 6.2, 7.1, 7.3)</p> <p>Education Services for Overseas Students (ESOS) Act 2000 (Cth) Privacy Act 1988 (Cth) Australian Privacy Principles Fair Work Act 2009 (Cth) Electronic Transactions Act 1999 Privacy and Personal Information Protection Act 1998 (PPIP Act) (NSW) Privacy Amendment (Enhancing Privacy Protection) Act 2012 Privacy Code of Practice (General) 2003 (NSW) Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)</p>
Related ASA Documents	<p>Cyber Security Governance Framework Critical Incident Policy Critical Incident Procedure Critical Incident Management Plan Facilities Review and Improvement Policy and Procedure Information Technology Policy and Procedure Learning Resources Policy and Procedure Privacy Policy and Procedure Staff Code of Conduct Student Code of Conduct</p>

1. Purpose

This Policy and Procedure provides direction for the management, maintenance, and disposal of records and information that are created, collected, used, and stored by ASA Institute of Higher Education (**ASA**).

2. Scope

This Policy and Procedure applies to all ASA applicants, students, staff, directors, officers, external appointees on any ASA board or committee, volunteers, and contractors. This document provides direction on all physical and digital records, data, and information generated or collected by ASA and includes but is not limited to:

- Student data, including but not limited to, financial or personal information;
- Human resources data and staff personal information;
- Organisational data, including but not limited to, governance records, representation material, and financial records; and

- Analytical data or data generated to support management or governance body decisions or directives.

3. Principles

This Policy and Procedure are based on the following principles:

- ASA is committed to implementing best practice in its record keeping and information management systems and ensuring the integrity and security of its records and information.
- Effective record keeping and information management provides evidence of actions, decisions and outcomes that may support future policy formulation and decision-making and protects the interests and rights of staff, students, and the wider community.
- Records and information management at ASA will comply with relevant legislative and regulatory requirements and standards in accordance with key operational and business objectives.
- The effective management and maintenance of records and information supports corporate accountability, efficient administration, and obligations in respect of privacy and confidentiality.

4. Definitions

Term	Definition
archived record	A record which is no longer required for business purposes, but which must be retained for a prescribed period.
Chief Executive Officer (CEO) / Principal	The Chief Executive Officer is the highest organisational role for ASA and performs the role of Principal as well as their other duties.
data	Data is raw, individual facts that need to be processed. When data is processed, combined with other data, organised, structured, or presented in a given context, it is referred to as information.
digital record	Any record accessible through a digital device (e.g., email, voicemail, Word file, video or audio recording), and data recorded by ASA's information management systems.
disposal	The process of deleting or destroying records or data.
financial record	Any record associated with the finances of ASA and may include: General Ledger, Income Statements, Balance Sheet, Cash Flow Statements, Accounts Receivable and Payable, Bank Statements, Tax Records, Payroll Records, Asset Register, Expense Receipts, Budgets and Financial Projections, Audit Trails, Student Fee Records, Grant and Funding Records, Insurance Policies, Contracts and Agreements, Financial Policies and Procedures.

Term	Definition
human resources data	<p>These refer to any record or data relating to the employment or engagement of persons for payment or volunteer duties and may include:</p> <ul style="list-style-type: none"> • position description; • letter of offer or employment contract or similar; • individual curriculum vitae (CV) or equivalent; • certified copies of qualifications; • documentation verifying recruitment or referee details; • communication between the staff member and ASA on formal matters, including disciplinary matters, details of formal grievance and any breaches of academic or research integrity; • annual performance reviews; • leave entitlements; • professional development details • scholarly activity; and • any other formal agreements or contracts between staff and ASA.
information	Information is data or facts that are meaningful and form the basis for documents referred to as records.
organisational data	<p>These refer to any record or data relating to the organisation of ASA, and may include:</p> <ul style="list-style-type: none"> • policy development, governance and corporate accountability documents; • meeting papers including agenda, reports and minutes of formally established boards and committees, including ad hoc committees, task forces and working parties or similar; • legal documents including contracts, memoranda of understanding or any agreement entered into by ASA with an external party; • marketing records and information; • responses to formal complaints and critical incidents; • documentation that demonstrates compliance with the Higher Education Standards Framework, such as evidence of internal audits; • formal communication between staff members, or staff members and students, or ASA and an internal or external entity, such as formal decisions, approvals, agreements and negotiations; and • correspondence received by ASA from external parties or sent by ASA to external parties; and • administrative records and information.
physical record	Any record that is able to be understood without a digital device, e.g., paper print out, an exam paper that is handwritten.
record	Any item containing or capturing information created or received by any person in the exercise of their functions for or on behalf of ASA in any format. A record can consist of one or more pieces of information that together form a record or context of the activity, action, or event.
retention	The act of keeping or retaining a record or data.

Term	Definition
student data	<p>These refer to any record or data relating to a student of ASA, and may include:</p> <ul style="list-style-type: none"> • information relating to admission processes, including the application form; • applications for credit for recognition of prior learning; • enrolment details; • academic results, including the final mark and grade for each subject; • data to allow the issuance and verification of Testamurs, Transcripts and AHEGS; • details recording the students' financial obligations, payment of fees, and refunds, where applicable; • student progression records and information, including any records and information of intervention interviews; • any allegations of misconduct or breaches of academic integrity, the process and outcome of these allegations and any other disciplinary meetings; • other documentation relating to the enrolment, progression, and cessation of study at ASA by the student.

5. Policy Statement

ASA is committed to ensuring that the data and information held is created, retained, and disposed of appropriately to ensure information provided by students, staff, and other parties are appropriately managed. This includes complying with all relevant legislation, protecting the privacy of individuals, and ensuring a successful business that can operate effectively.

6. Management of Records

6.1 Creation and Capture

ASA will capture and maintain records, information and data to support routine business activities, provide evidence where required, demonstrate accountability, and ensure a data trail is effectively documented.

All staff are required to keep appropriate and accurate records and information which document decisions and actions for which ASA may be held accountable. All formal documents will be identified with version control and record the date on which the document is created or amended.

In the creation and review of student data collection processes, only necessary data will be collected in order for operational or legislative requirements. The collection of unnecessary data will be avoided. ASA is committed to providing an equitable educational experience and will request data relating to disability, accommodation or adjustments for engagement or learning, only once an application has been accepted to avoid the occurrence, or perception of, discrimination. This is detailed in the *Diversity and Equity Policy and Procedure*.

6.2 Management

Access

ASA has an obligation under privacy legislation to protect private, sensitive and/or confidential information relating to staff and students or any other person with which it deals. Accessible, accurate, and complete record keeping underpins efficient business operations.

Authorised access to appropriate records and information by staff is determined by role functionality and staff are only able to access records and information if they have a legitimate business reason to do so.

Each user account is:

- configured with varying access and authorisation within systems;
- determined by staff role requirements; and
- protected at each access point by log in details that are not replicated for other access points.

Some systems require Two Factor Authentication (2FA). Staff access is reviewed during onboarding/induction and offboarding and every three (3) months during employment.

All students will be able to access and update any record of their personal information to ensure that data remains up to date and accurate. Current students will have access to their academic records if they are current in their fees.

Security

It is a requirement that all records and information, including that of a sensitive and confidential nature, are secured with a system of authorisation in order to prevent unauthorised access, removal or alteration.

The following processes ensure that information and records are appropriately secured:

- Storage of records and information occurs as close as possible to date of receipt.
- Student records and information are stored according to policy documentation and operational processes.
- Physical records are only accessible to authorised staff and are stored in cabinets that are locked when not in use.
- Third party access to records and information is limited to what is required under law, contractual agreements, or what is allowable with the express and written permission of an appropriate person including a staff or student.

Digital Security

ASA is aware of the risks of digital interruption and has a *Cyber Security Governance Framework* to outline how those risks are controlled. The following processes ensure that digital information and records are appropriately secured:

- All users of the computer network will have a unique password and username, with requirements to update passwords every three (3) months.
- Levels of access to information and systems will be differentiated in accordance with levels of authorisation.
- Maintenance of a secure computer network including Wi-Fi networks to secure digital records, with system testing and software updates.
- implementation of monthly back-up of systems by the external systems providers;
- daily back-up of internal systems on approved ASA Network Drives or personal OneDrive;
- installation and maintenance of anti-virus software and firewalls and other up-to-date security mechanisms as appropriate.

6.3 Release or Review

Record management activities and practices will be regularly reviewed to ensure that records are being created and maintained correctly, and that an accurate record of the ASA's business activities and affairs is being captured.

Release of records is not to be provided to external parties unless authorised by the Chief Executive Officer (CEO), or delegate, permissible under ASA's policy suite documents, or where required by law.

6.4 Retention and Disposal

It is a requirement that records, and information must be maintained securely and not damaged, altered, or destroyed without proper authorisation. All records and information must be available for authorised access as and when required. Physical records and information will be securely shredded. Digital records and information will be deleted from systems and, if relevant, deleted from secondary repositories.

Records and information may be destroyed or safely disposed of only if:

- the appropriate retention period has expired;
- proper authorisation to dispose of a record or records and information has been obtained; and
- the record or records and information are not required to be kept for a longer period by any relevant legislation.

Records and information which must be held indefinitely, and non-current or historical records and information, will be archived. See Appendix A for retention periods.

ASA's *Cyber Security Governance Framework*, *Critical Incident Management Plan*, and associated *Policy* and *Procedures* outlines procedures for mitigating or containing potential loss of records that occur contrary to this Policy and Procedure.

7. Roles and Responsibilities

Record or Information Type	Responsible Role
Academic Records	Academic Dean
Campus/Premise, Facilities and Information Technology Records and Information	Director Student Experience
Financial Records and Information	Finance Manager
Human Resources Records and Information	CEO
Registration and Accreditation Records and Information	CEO
Student Records and Information	Director Student Experience

The CEO, or delegate, is responsible for:

- Ensuring that all records and information management meets or exceeds minimum legislative and regulatory requirements.
- That there are systems and processes in place to prevent unauthorised or fraudulent access to private or sensitive records. This includes information where unauthorised access may compromise academic integrity.
- Providing approval for records to be shared with external parties, as appropriate.
- Ensuring that all agreements with third parties include requirements to ensure secure hosting of ASA records, information and data.
- Implementing and supporting a culture of strong records management compliance.

- Providing approval and authorisation for the destruction of records as appropriate.
- Ensuring all records required or related to any legal action are kept indefinitely.

The Senior Management team detailed below are responsible for records and information management at the organisational level, ensuring the implementation of this policy and ensuring the security and confidentiality of these records and information.

The Director of Student Experience, or delegate, is responsible for:

- Timely production of student academic records including Testamurs, Transcripts and Australian Higher Education Graduation Statement (AHEGS).
- Ensuring that all student application documentation is compliant and accurately recorded in ASA's Student Management System and on PRISMS.
- Recording and assessing outcomes for applications for Recognition of Prior Learning and the basis on which outcomes were determined.
- Creating and maintaining records of any critical incidents, sexual assault, and workplace injuries or near misses.
- Ensuring that students are prompted to review and update their personal details every six (6) months.
- Maintaining accurate documentation relating enrolment, orientation, progression, and cessation of study of a student at ASA.
- all records and decisions regarding formal student complaints, appeals and outcomes.

The Finance Manager, or delegate, is responsible for:

- Creating and maintaining all records of ASA's financial standing and core financial information;
- Creating and maintaining records of ASA's financial capacity, capability, and trajectory including budgets and projections.
- Accurately recording Tuition Assurance Scheme (TPS) contributions and management of related payments.
- Creating and maintaining records to support ASA's financial audit requirements and financial regulatory reporting.
- Ensuring that all required financial disclosures and statements are published appropriately.

The Academic Dean, or delegate, is responsible for:

- Maintaining student academic progression information, including any records and information of intervention interviews every quarter.
- Recording assessment and academic results, including the final mark and grade for each subject.
- Recording allegations of misconduct or breaches of academic integrity, the process and outcome of these allegations and any other disciplinary meetings.
- Recording academic continuous improvement activities.
- Collating and reporting on scholarly activities and professional development for academic staff.
- Creating and maintaining academic resource lists.

All Staff are responsible for:

- Creating appropriate and accurate records of the academic and business activities of ASA.
- Participating in records and information management training as a part of the staff induction process by Senior Management.
- Ensuring records are handled with care and protected from inadvertent damage and unauthorised access.
- Ensure all records and information under their control have been appropriately transitioned to remaining staff prior to the cessation of their employment.

8. Relevant HESFs

As a registered education provider, ASA operates under various laws and regulations. Policies and procedures are in place to ensure compliance with such laws.

This Policy and the associated Procedure comply with the Higher Education Standards Framework (Threshold Standards) 2021 which specifies that:

Standard 7.3 Information Management [...]

3. Information systems and records are maintained, securely and confidentially as necessary to:
 - a. maintain accurate and up-to-date records of enrolments, progression, completions and award of qualifications
 - b. prevent unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic or research integrity
 - c. document and record responses to formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents, and
 - d. demonstrate compliance with the Higher Education Standards Framework.

9. Version Control

This Policy and Procedure has been reviewed and approved by ASA Board of Directors as at December 2023 and is reviewed every three years.

The Policy and Procedure are published and available on the ASA website
<https://www.asahe.edu.au/policies-and-forms/>.

Change and Version Control				
Version	Authored by	Brief Description of the changes	Date Approved:	Effective Date:
2024.1	Quality and Policy Officer	Document formatting updated to reflect change of Trading Name to ASA Institute of Higher Education.	28/06/2024 by CEO	01/07/2024
2023.1	Project Officer	Updated document name to reflect expanded content. Incorporated data and information as well as records. Included additional information regarding digital records. Include HESFs references, changes in regulatory compliances and created an appendix outlining retention periods. Benchmarked against 5 other Higher Education Providers.	12/12/2023	18/12/2023
Previous version archived. New Policy code and numbering system implemented.				
2.1		Update to TEQSA standards	04/11/2020	
2.0		Board of Directors approval after governance restructure.		
1.0		Council approval		

Appendix A - Retention Periods

Business Record	Minimum Retention Period
Accreditation and Registration Records and Information	Seven (7) years after ASA ceases to operate as a Higher Education Provider.
Business Records	Seven (7) years from the date of creation.
Campus/Premise, Facilities and Information Technology Records and Information	Seven (7) years from the date of creation.
Financial Records	Five (5) years from the financial year in which taxes are paid or when tax losses are claimed.
Human Resources Records	Five (5) years after the staff member ceases to be a staff member of ASA, unless there are ongoing matters (such as legal issues).
Legal Records	Records required for legal action: Retained indefinitely , including appeals.

Student Records	Minimum Retention Period
<p>Details of Overseas Students at application stage must include:</p> <ul style="list-style-type: none"> • Name • Gender • Date of birth, • Country of birth • Nationality • Start date and expected duration of the student's course • Expected completion date • Course • Delivery location • Overseas/Permanent address • The student's passport number and expiry date; and • If the student holds a visa, the visa number. <ul style="list-style-type: none"> • Total tuition fees required to be paid to undertake full course • Amount of tuition and non-tuition fees received before confirming the student's enrolment using PRISMS • Whether premiums have been paid for student health insurance before the course commences <ul style="list-style-type: none"> • If the student has undertaken a test to determine their English competency, the name of the test and the course taken, and the score • Any applications for Recognition of Prior Learning 	<p>Application information is entered into ASA's Student Management System and PRISMS</p> <p>Two (2) years after the student ceases to be a student of ASA.</p>
Examinations and assessments	Two (2) years after the student ceases to be a student of ASA.

Student Records	Minimum Retention Period
Records of current students must also include: <ul style="list-style-type: none"> • Current residential address; • Mobile phone number or other contact numbers (if any); • Email address (if any); • Amount of money paid to ASA; • Duration of course paid for; • Amounts owing to ASA; • Written agreements between the student and ASA; 	Two (2) years after the student ceases to be a student of ASA.
Records of all student complaints and appeals, made under the Student Complaints and Appeals Policy and associated Procedure	Five (5) years from the date the complaint or appeal was lodged.
Records relating to proven allegations of misconduct, made under the Student Code of Conduct and/or Student Academic Misconduct Policy and associated Procedure	Five (5) years from the date of the misconduct incident.
Records of all requests from international students for a release to transfer to another registered provider, made under the International Student Transfer Between Registered Providers Policy and associated Procedure, and the assessment of, and decision regarding, the request	Two (2) years after the student ceases to be a student of ASA.
Records of all applications from students for advanced standing, made under the Advanced Standing Policy and associated Procedure, including any accompanying evidence, the assessment of, and decision regarding, the application	Two (2) years after the student ceases to be a student of ASA.
Records required for legal action	Retained indefinitely , including appeals.
Certification documentation, including: Testamurs, Transcripts and Australian Higher Education Graduation Statement (AHEGS).	Retained indefinitely .