Records Management Policy

Table of Contents

A. Overview

i. Lead Institute of Higher Education ('the Institute' or 'LIHE') Records Management Policy ('the Policy') provides a framework to ensure full and accurate records for all LIHE activities are created, stored and managed appropriately, in compliance with the State Records Act 1998 (NSW) and the Higher Education Standards Framework (Threshold Standards) 2021. LIHE recognises records as the corporate memory of the Institute. Records also include the academic credentials of students. LIHE values records as a vital asset in supporting its daily functions and operations and will provide systems and support for this purpose.

ii. Definitions

For definitions, please refer to the 'Dictionary of Terms'.

B. Scope

This Policy applies to all LIHE staff.

C. Policy Principles

This Policy is underpinned by the following principles:

i. The collecting, creating, and maintaining records will comply with legislative requirements and in accordance with key operational and business objectives;
ii. Information will be stored and maintained securely, and confidentially as necessary to prevent unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic or research integrity;
iii. Records will be stored digitally or as hardcopy where required and may be subject to restrictions on disposal/ deletion;
iv. Records will be accessible to authorised staff within the appropriate level of permissions;
v. Students will be able to access their own records upon request as per an approved process;
vi. Records will be disposed in a safe and secure manner;
vii. Various types of records collected, maintained and disposed of will be managed by appropriate teams and managers;
viii. Research data and primary materials will be managed in accordance with the Australian Code for the Responsible Conduct of Research, 2018;
ix. Audits of records will be conducted in accordance with regulatory and legislative requirements.

D. Types of Records

Types	Description
Registration and course accreditation records	a. the accreditation status of each course of study; b. the qualification(s) offered; c. the Australian Qualification Framework (AQF) Level of the qualifications; d. confirmation of recognition of each course of study by the relevant professional body(ies) if such recognition is required for registration of graduates to practice; e. whether each course of study is authorised to be offered to international students studying on an Australian student visa; f. the duration of each course of study; g. details of the credit and recognition of prior learning policy that

	applies to each course of study and direction on how to obtain information on any articulation or credit arrangements that may apply to the course.
Student records	Student records include student assessment, moderation information, examinations and results, student registration data, advanced standing applications and student misconduct reports: Registration data: a. Demographic factors; age, gender, geographic location and occupation/employment if applicable;, b. Language profiles including language ability in main language of teaching and learning and language background; c. Motivation for learning, for example, for career purposes or personal interest; d. Educational background/learning experience, for example, prior qualifications; e. Special needs/additional support, for example, learning difficulties. De-identified student registration data can be applied to the following potential reports: a. Number of student enrolments per course or qualification; b. Total number of enrolments for the Institute within a specific period; c. Race and gender data as per meeting the Institute's commitment to equity and access; d. Attrition/retention rates to measure success of interventions; e. Student completion rates.
Staff records	a. Staff records are kept by the human resources department. b. These include personnel files, performance appraisals, misconduct records, and other relevant personal data of institutional staff.
Legislative records	a. Records and information as well as correspondence and communication whether in hard or electronic copy will be retained and filed in separate, uniquely identifiable files reserved for compliance purposes as an accredited higher education institution. b. The Dean has the ultimate responsibility of recording, maintaining, safekeeping and backup.
Financial records	a. Financial records pertain to staff and student finances, staff salaries and banking details, institutional finances, and other confidential information of a financial nature. b. Finance Manager will have access to budgets and variance reports to enable the effective management of the Institute.
Other types of records	a. All other types of records will be subjected to the same requirements as outlined in this Policy. b. Other types of records refer to videos, film, sound records, photographs, pamphlets, maps, plans, registers, circulars, publications, financial records, etc.

E. Creation and Storage of Records

i. LIHE ensures that records are created to document business operations and are captured in recordkeeping systems for:

a. Business continuity: so that staff undertaking the Institute's business can access historical decisions and activity;
b. Protection of rights: LIHE's legal, financial and other rights and its obligations to its staff, students, and others affected by its actions;
c. Accountability: to enable scrutiny of business operations by anyone authorised to do so.

ii. All information, data and records must be created in a complete and contextual manner which reliably documents the business activities of the Institute across all physical and digital operating environments.

iii. All information, data and records must be maintained appropriately in managed and approved storage solutions that are able to ensure their integrity, usability, and discoverability.

iv. LIHE's records created or received by email or electronic documents held on personal computers must be incorporated into a recordkeeping system. Information and records must not be created and maintained in any personal or private cloud storage services such as Dropbox, Google Docs, iCloud, or OneDrive.

v. Verbal decisions and commitments should be recorded and incorporated into a recordkeeping system, e.g. documented in a 'note for file' incorporated into the relevant file.

vi. Formal meetings should be documented by an agenda, minutes, and any supporting documentation.

vii. Information and records must be considered in all IT-enabled projects and services such as new business information system implementations, or improvements to existing systems, whereby the functionality and system requirements for information and records are defined and designed during the evaluation phase or process.

F. Security of Records

i. LIHE ensures, through the design and management of its recordkeeping systems, that records maintain their integrity and authenticity through control mechanisms to prevent unauthorised access, alteration or removal. Through the design, maintenance and management of the LIHE recordkeeping systems, integrity and authenticity of records will be maintained by control mechanisms to prevent unauthorised access, alteration or removal.

ii. LIHE provides storage facilities appropriate to the format, usage, confidentiality, and continuing value of its records, according to the National Archives of Australia (NAA) Standard for the storage of archival records, so that they remain useable for as long as they are needed and any special requirements for security are met.

iii. Records held in electronic form are backed up on a regular basis and migrated to new systems when necessary, so that they remain useable for as long as they are needed.

G. Access to Records

i. LIHE only provides access to the Institute's records to appropriately authorised staff. Where there is a particular reason to do so, access may be restricted to particular staff positions or business areas. Restrictions such as commercial-in-confidence are used where LIHE has a contractual obligation to maintain confidentiality or is required by law to do so.

ii. Access to personal information is provided subject to the privacy principles in the Privacy and Personal Information Protection Act 1998.

iii. LIHE provides public access to the Institute records under the provisions of the Freedom of Information Act 1982 and the Archives Act 1983.

iv. LIHE's records must not be provided to external agencies or organisations without following the appropriate Policy and Guidelines in consultation with the Institute's senior management.

H. Disposal of Records

Staff may destroy or dispose the records of LIHE only after the following retention periods have expired:

i. Business records: seven (7) years after creation;

ii. Student records: two (2) years after the student ceases to be a student. However, sufficient information to re-issue a testamur or academic transcript is to be kept in perpetuity;

iii. Staff records: five (5) years after the staff member ceases to be a staff member.

I. Compliance

All staff must ensure that their recordkeeping practices comply with this Policy and external laws and regulations. Failure to comply with the requirements of this Policy may result in disciplinary action up to and including termination or expulsion and may result in prosecution in accordance with state and federal law.

Appendix 1 - Student Records Retention Periods

Documents retained	Minimum retention period(s)
Administrative records of all students, including: a. Name b. Start date and expected duration of the student's course at the Institute; c. Date of birth, country of birth and nationality; d. Course and location; e. Current residential address; f. Mobile phone number or other contact numbers (if any); g. Email address (if any); h. Fees paid to the Institute; i. Duration of course incurring tuition fees; j. Amounts owing to the Institute; k. Written agreements between the student and the Institute; l. Up-to-date records of grades and progression; m. Advanced standing applications and awarding of credit	Until two (2) years after the person ceases to be a student
Academic records – examination scripts and assessments	Twelve (12) months from the date on which the grade decision was ratified (unless relating to a complaint or appeal – see below).
Student complaints and appeals records	5 years from the date the complaint or appeal was lodged
Records relating to proven allegations of misconduct	5 years from the date of the misconduct incident
Records required for legal action	Retained until the completion of that legal action, including appeals.

Certification documentation, including:
    a. A testamur; and
    b. Records of results
	Electronic records containing information on student results for Australian Qualifications Framework (AQF) qualifications will be retained for 30 years after the student's course completion date, to enable re-issuance of statements of attainment or qualifications (if required)

All requests for release from overseas students, including the date of the request, the reason for the request, and the outcome of the assessment	Retained for 2 years after a student cease to be a student.
A written record of every critical incident and the corresponding remedial action taken	Retained at least 2 years after a student cease to be a student.
Overseas student records	
Details of students accepted for admission, including: a. Agreed start date of the student's course at the Institute; b. Day when the student is expected to complete their course at the Institute; c. Amount of tuition and non-tuition fees received before confirming the student's enrolment using PRISMS; d. Total tuition fees required to be paid to undertake full course; e. Whether premiums have been paid for student health insurance before the course commences;	Until the information is entered into PRISMS – within 14 days of the student being accepted into their course at the Institute (unless retained for 2 years as above – such as through the written student agreement

f. If the student has undertaken a test to determine their English competency, the name of the test and the course taken, and the score; *g.* The location of the Australian government immigration office where the student's visa application was lodged; *h.* The student's passport number; and *i.* If the student holds a visa, the visa number.	

Version	Approved by	Approval Date
4	Governing Council	21 June 2024
Next Review	**Custodian**	**Effective Date**
Refer to the *Policy Documents Review Schedule*	Dean	21 June 2024
Related Documents	Dictionary of Terms Quality Assurance Policy Delegation of Authority Policy	
References and Legislations	National Code of Practice for Providers of Education and Training to Overseas Students 2018 Higher Education Standards Framework (Threshold Standards) 2021 Privacy and Personal Information Protection Act 1998 No 133 State Records Act 1998 Electronic Transactions Act 2000 Freedom of Information Act 1982 Archives Act 1983 . National Archives of Australia (NAA) Standard	