

RECORDS MANAGEMENT

Policy and Procedures

DEFINITIONS

Terms in this document, for which definitions are not provided in the text or may not be self-evident or for which usage at ACC may differ to that in other higher education institutions are as follows:

Archives: Those records that have been identified as having continuing value and that are kept as part of the ACC's archives collection.

Assessment record: The actual pieces of work completed by a student, or evidence of that work. An assessor's completed marking guide/criteria/observation checklist for each student will be sufficient evidence of an assessment record. However, it must contain enough detail to enable an auditor to form a valid opinion of compliance with required standards. The assessor's checklist should include a summary of feedback given to the student, the name of the assessor and the date of the assessment.

Assessment instrument: A document that clearly demonstrates what has been assessed, how this occurred, and the linkage to the competency standards in the 4 year Bachelor of Chiropractic degree or to any other approved award program. The assessment instrument must be supported by objective criteria on which the assessor will base the assessment decision, such as model answers which list the key points.

Course (Program): The equivalent term to 'course' used by the ACC is 'program', which refers to the 4 year Bachelor of Chiropractic degree or to any other approved award program.

FARC: The ACC's Finance, Audit and Risk Committee, which is a committee of the Board of Directors.

Legal document: refers to all legal documents, such as memoranda of understanding, contracts and agreements, but excludes staff employment contracts.

Record: Any document or other source of information compiled, recorded or stored in written, graphic or pictorial form or on film, or by digital/electronic process.

Records Management: The efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of, and information about, business activities and transactions in the form of records (AS ISO 15489.1:2016 Records Management).

Staff: In the context of this policy and procedure 'staff' includes all ACC employees (whether full-time, fractional full-time or casual), Conjoint and Adjunct appointees, visiting, exchange or seconded staff from other institutions, volunteers, trainees, people on work placements, independent consultants and contractors and other associates of the College or authorised personnel with access to College resources.

Student results: A record of the final assessment outcome for each student for each unit of the program. It must include the code and title of the unit and the date the final assessment was completed.

Business Unit: A clearly defined operational unit within the ACC structure.

PURPOSE

This policy establishes a framework for Records Management that supports the various business activities of the ACC to ensure compliance with legislative requirements and relevant standards.

The management of records is critical to effective institutional governance and management. Accordingly, the ACC provides resources and infrastructure to store, archive and retrieve corporate, student, staff and academic business related documents.

SCOPE

This policy applies to all ACC business and record keeping systems. It concerns records which are created, received, collected, processed, used, archived, stored and disposed of in the conduct of ACC business.

The records and information include, but are not limited to, student files, staff files, correspondence, business emails, administrative files, financial records, legal records, and minutes of meetings of the ACC committees or boards or working groups convened for specific projects.

The Policy applies to all College staff as defined above.

POLICY

The ACC is committed to developing and maintaining a comprehensive, efficient and reliable system for Records Management as a means of ensuring effective ACC governance and the efficient management of its day-to-day business operations.

A high standard of records management assists in ensuring fair and due process to staff and students and to managing various aspects of strategic, operational, academic and project risk. It is integral to the ACC's Risk Policy and enabling compliance with relevant legislation (including but not limited to workplace health and safety, privacy, and public release of information), Higher Education standards and Regulatory requirements and instruments.

At an operational level, the ACC recognises the importance of records as a vital asset in:

- providing evidence of actions and decisions;
- supporting daily functions and operations;
- supporting policy formation and high level decision-making;
- enabling the delivery of services in consistent and equitable ways;
- supporting consistency, continuity, efficiency and productivity in delivering core business; and
- retaining corporate memory.

Accordingly, a robust Records Management Program will be implemented across all business units of the ACC and encompasses the capture of essential data and records storage, access and disposal.

PRINCIPLES

The ACC adopts the following principles:

- Business records are appropriately created, managed, maintained and disposed of in accordance with legislative requirements, policies and recognised standards of best practice.
- Student recordkeeping practices are set up to support all administrative reporting requirements of the ACC.
- Recordkeeping practices are consistent across the College.

- Information in the form of records is:
 - ready for re-use and remains accessible for as long as needed;
 - accessed across the organisation only by those with legitimate authority and need; and
 - accurate, up-to-date and complete.
- Levels of responsibility are established regarding recordkeeping as relevant to all functions, processes, activities and transactions.
- Systems and staff protect information from unauthorised access, alteration, deletion or misuse.
- Everyone understands and appreciates the value of information as an asset for the organisation.

RESPONSIBILITIES

The President is responsible for ensuring the ACC complies with legislative requirements for records and information management.

The General Manager, as the Chief Executive Officer's delegate, has the responsibility for overseeing compliance with the Records Management Policy and management of the ACC Records Management system and protocols.

Professional staff with delegated responsibilities for Records Management are responsible for developing, implementing and monitoring the ACC Records Management System as well as providing an effective training and awareness program which provides staff with the knowledge and skills required to fulfil their record and information keeping obligations.

ACC staff who are in a supervisory capacity are responsible for ensuring that the staff who report to them understand and comply with records management policy. Managers and Supervisors must monitor record and information keeping practices within their business areas and encourage and support positive practices.

All ACC staff including casual staff as well as individuals who may perform work on behalf of the ACC are responsible for ensuring that they only access records and information relevant to their role, and that they understand and comply with the record and information keeping requirements outlined in this Policy.

PROCEDURES

1. Business Units

Each business unit within the ACC must:

- comply with this policy on records management;
- ensure full and accurate records are made and kept of all activities carried out by the unit;
- manage the records of the unit;
- create and maintain appropriate files;
- determine appropriate retention periods; and
- determine appropriate access restrictions.

2. Boards/Committees

The secretaries and/or chairs of all boards, committees, working parties and project teams must:

- manage all meeting records agendas, papers, minutes and circular resolutions if required between meetings;
- create and keep full and accurate records of all board committee, working party or project team meetings;
- comply with all relevant ACC policy on records management in regard to the above records; and
- register all meeting records in the ACC Records Management System.

3. Defining Records

The following criteria (an indicative but not exclusive list) are used by staff with relevant authority in determining if records need to be saved into the records management system.

If the record:

- is written, received and/or used in a or an ACC business activity, including governance and/or daily operations and/or other business dealings;
- approves or authorises ACC actions;
- signifies a policy change or development;
- commits the ACC to an arrangement or business deal;
- contains advice or provides guidance for people inside or outside the ACC;
- requires an action by the ACC;
- is an email that is likely to be reviewed or audited;

then the record will require archiving in the records management system.

4. Creating Records

Records must be created and indexed as close to the commencement of a business activity or issue as practicable. This will ensure that a full and accurate record is captured and maintained within the records management system as soon as practical.

5. Electronic mail (Email)

Email correspondence is an official record where it is used to document business activity of the ACC. The record must be stored within the records management system including all previous threads and relevant attachments to ensure it is a full and accurate record.

6. Business Systems and Databases

Where business units purchase or develop business systems, record-keeping requirements should be considered and documented at the requirements/tender stage.

7. Ownership, Custody and Control of Records and Archives

All records created by staff, or received by staff, in the course of the ACC's operations and activities, are owned by the ACC unless otherwise specified under contract.

8. Back up of electronic records

Backup copies are to be made of all essential computer records and a copy of them kept in a secure location off site.

9. Physical Storage locations and security

Physical records must be stored in a secure area with access only provided to authorised staff. Where records are stored with an individual employee, they should be made available to authorised users at all times.

Current records will be stored on-Campus, within the business unit that is responsible for the records.

Non-current records should be indexed into the records management system and either destroyed or stored as archives in a suitable location.

10. Legal Records

Where the ACC receives legal records of significance, such as deeds of ownership, they must be lodged with the President who will retain custody of such records.

11. Financial records

Financial records are to be maintained for all transactions as required by the Australian Taxation Office (ATO) and any funding requirements. Such documents are to be stored securely by the Office of the General Manager.

12. Student records

1. The ACC will ensure that current and past students are able to access their results and assessment records.

2. All assessment instruments used to assess students must also be stored.
3. All student records will be kept in a secured filing cabinet or room or on a computer system that requires password access.
4. There is no third party access allowed to student records, except for those staff who are authorised to access those records as part of their role.
5. The system used for managing student records will be compliant with all regulatory and funding requirements.

13. Privacy

All records relating to individuals will be handled in a way consistent with the Privacy Act 1998 as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (which came into force on 12th March 2014).

14. Retention

All ACC records must be retained for the greater of the minimum retention periods identified in State Records Legislation or as specified in Schedule A.

Each business unit is responsible for evaluating whether, in particular cases, the minimum retention periods specified by management with record retention and disposal delegated authority are adequate for business needs. Minimum retention periods can be increased but not decreased and decisions to increase the retention period will be notified to the General Manager and reported to the ACC Board through the FARC.

15. Storage

Non-current, physical records can be stored off site in a suitable facility. The Office of the General Manager will manage offsite records.

The attached Schedule A. provides a guide to the storage timeframes for some of the most commonly used records.

RELATED DOCUMENTS /POLICIES

- Privacy Policy
- Secure Information Management Policy and Procedures
- Risk Policy and Framework
- Staff induction and Professional Development
- Recruitment Admissions and Orientation Policy
- Assessment of Coursework Policy and Procedure
- Academic Progress Domestic Students Policy and Procedures
- Academic Progress – International Student Policy and Procedures
- Student Academic Appeals Procedures
- Grievance Management Non Academic (Students) Policy and Procedures
- Grievance Management (Staff) Policy and Procedures
- International Student Admissions Policy and Procedures
- International Student Agreement

RELATED LEGISLATION

- Privacy Act 1988 (Cth)
- Corporations Act 2001 (Cth)
- Student Identifiers Act 2014
- Freedom of Information Act 1982
- Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)
- Higher Education Standards Framework (Threshold Standards) 2015

- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students Regulations 2019 (ESOS Regulations)
- National Code of Practice for Providers of Education and Training to Overseas Students 2018

VERSION CONTROL

Document: C003 Records Management Policy and Procedures		
Responsible Officer: General Manager		
Initially Approved by: Board of Directors		Date: 19 October 2016
Reviewed and approved by: Finance, Audit and Risk Committee (FARC)		Date: 14 July 2021
Reviewed and approved by: Board of Directors		Date: 26 October 2021
Version: V2.1	Replaces Version(s): V2.0	Next Review: July 2024
Nature of Change	<p>July 2021 Scheduled P&P Review – Up-dated in line with approved Schedule for P&P Review. Adjustments include insertion of definitions, and revised text which reflects the stage of development of the ACC, current practice, and changes in senior management roles and responsibilities.</p> <p>October 2021 Minimum retention period for overseas student records.</p>	

SCHEDULE A

Type of Record	Description	Period and number to be retained
Application and Enrolment Forms	Both successful and unsuccessful applications	Seven years for successful applicants and one year for unsuccessful applicants.
Assessment instruments/tools/procedures and assessors' marking guides/criteria/observation checklist (This refers to the master copy) Learning and Assessment strategy		The ACC will keep a master copy of all assessment instruments tools/ procedures used for seven years. This is to cover the possible requirement to produce evidence as to how a person was assessed as competent. Three years
Complaints and Appeals (academic and non-academic)	All records relating to any complaint or appeal	Minimum of seven years after the closing of the case.
CRICOS	All records relating to overseas students living and studying in Australia which include, but are not limited to: Letters of Offer, Written Agreements, Confirmation of Enrolment (CoE), attendance records, academic records including at-risk and intervention records, residential address, and financial records including receipts for fees paid.	At least 2 years after they graduate or cease to be an accepted student in accordance with the National Code 2018 and ESOS Act 2000.
Education Agent Contracts	All contracts with Education Agents	Seven years
Management records	All records of legal and financial management	Seven years
Marketing material	All approved marketing material	Minimum of two years after production/ printing
Staff Records	All staff records including skill matrices, copies of qualifications and agreements	Minimum of five years after the cessation of employment or contract
Student assessment records (This refers to the student's completed work)	During the appeal period: Sufficient evidence of how the assessment was made to justify a decision if an appeal is made. If it is impractical to keep all completed assessment items for every student until after the appeal period, then only	During the appeal period: Either the completed assessment items or evidence of the assessors' marking guide/criteria/observation checklists for every student to cover each unit of the course/program is to be

	<p>the assessor's completed marking guide /criteria/observation checklist for each student for each method of assessment used need be retained.</p> <p>After the appeal period: After the expiry of the appeal period, only the assessor's completed marking guide/criteria/observation checklist for each method of assessment used, for each student need be retained. It must have sufficient detail to allow an auditor to form a valid opinion of the standard. The assessor's checklist should include a summary of feedback given to the student, the name of the assessor and the date of assessment. If no checklist is used, the completed assessment item itself must be retained.</p>	<p>retained These must be retained until the expiry of any appeal period.</p> <p>After the appeal period: After the expiry of the appeal period, and if no appeal has been lodged the assessor's completed marking guide/criteria/observation checklists (or the items themselves) will be retained for 12 months following notification of the final result for each unit of the course/award program.</p> <p>Such evidence will be retained for a minimum of 10 students or 10% of students (whichever is greater) enrolled in each unit of a course/award program. If less than 10 students in the cohort, all records are to be retained.</p> <p>In the event of an appeal, the relevant assessment details for the appellant and all records pertaining the appeal and the outcome, will be retained for a minimum period of seven (7) years.</p>
Student results for each Unit of the Course/Award Program	Records may be electronic or hard copy and should show, for each unit of the course/award program, the student results and the date of the result.	100% of student results for each unit for 30 years
Third Party Agreements	<p>Any agreement between the ACC and a third party to:</p> <ul style="list-style-type: none"> • Deliver training and or assessment • Provide any form of marketing services <p>(NOTE this can be the ACC providing the services or the ACC subcontracting the services)</p>	In addition to details of any Third Party Agreements and, in the case of being lodged with TEQSA, the documentation relating to the agreement (including to the management and reviews) to be kept for the life of the agreement plus 2 years.