

RECORDS MANAGEMENT

Policy

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 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.

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.

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 ACC program.

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: 2017 Information and Documentation – Records Management Concepts and Principles).

Staff: In the context of this policy '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.

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 Management Framework 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, robust records management practices are implemented across the ACC and encompass 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 CEO is responsible for ensuring the ACC complies with legislative requirements for records and information management and has responsibility for overseeing compliance with the Records Management Policy and management of the ACC Records Management system and protocols.

Responsibility for the management of records is as follows:

- CEO
 - All corporate records, including but not limited to:
 - Contracts
 - Memorandums of Understanding
 - Lease documents
 - Loan agreements
 - All human resource and staff records
 - All governance records, including but not limited to:
 - Board and Committee appointments
 - Boards and Committees meeting records
 - Governance framework and policy and procedure documents
 - All joint student and staff policy and procedure documents
 - All human resource policy and procedure documents
 - All corporate operational policy and procedure documents
 - All documents and records not covered by the Academic Dean, the Academic Operations Manager or the Marketing and Student Engagement Manager.
 - All records related to regulators
 - Breach of Code of Conduct records
- Academic Dean
 - All program records, including but not limited to
 - Program structure
 - Constructive alignment
 - Unit Profiles
 - Academic Scholarship records
 - Academic Quality policy and procedure documents
 - Work Integrated Learning policy and procedure documents
- Academic Operations Manager
 - All current and previous student records
 - Student at risk records

- Formal academic support records
- Reasonable adjustment records
- Academic misconduct records
- Academic delivery records
- Academic Operations policy and procedure documents
- Marketing and Student Engagement Manager
 - All prospective student records
 - All marketing and student recruitment policy and procedure documents
 - All education agent and marketing representative records.

RELATED DOCUMENTS /POLICIES

- Records Management Procedure
- All policy and procedure documents

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 2021 (TEQSA Act)
- Higher Education Standards Framework (Threshold Standards) 2021
- 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.

REVIEW

This Policy is reviewed, at least, every three years.

It is a policy of the ACC that any Policy or Procedure may be reviewed earlier as indicated by internal or external factors (including but not limited to such factors as changes in the guidelines of regulatory authorities, accreditation/registration requirements of the profession, or relevant legislation at state or federal level) as determined the Board of Directors and/or Academic Board.

VERSION CONTROL

Document: C003 Records Management Policy and Procedures		
Responsible Officer: CEO		
Initially Approved by: Board of Directors		Date: 19 October 2016
Reviewed and approved by: Board of Directors		Date: 26 October 2021
Reviewed and approved by: Board of Directors		Date: 22 November 2022
Reviewed and approved by: Board of Directors		Date: 29 July 2025
HESF	7.3 Information Management	7.3.3
Version: V4.0	Replaces Version(s): V3.0	Next Review: July 2028
Nature of Change	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. - October 2021 - Minimum retention period for overseas student records. November 2022 - Separate the policy and procedure documents - Add the review requirements - Allow for the inclusion of award and non-award programs - Reviewed and updated Schedule A July 2025 - Scheduled review - Update to responsibilities to align with the ACC organizational structure.	

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.
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 after expiry of the contract
Legal records	All records of legal and financial management	Seven years
Financial records	All financial records	Seven years after the end of the financial reporting year to which they relate
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	<u>During the appeal period:</u> Either the completed assessment items or evidence of the assessors' marking guide/criteria/observation checklists for every student to cover each unit of the program is to be retained These must be retained until the expiry of any appeal period.

	the assessor's completed marking guide /criteria/observation checklist for each student for each method of assessment used need be retained. 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.	<u>After the appeal period:</u> 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 award program. Such evidence will be retained for a minimum of 10 students or 10% of students (whichever is greater) enrolled in each unit of a award program. If less than 10 students in the cohort, all records are to be retained. 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.
Student results for each Unit of the 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
Award of Qualification Register	The register of qualifications awarded, including the following: - The name of the issuing provider - The name of the qualification - The full name of the qualification recipient - The date of issue - The person authorised to issue the award	30 years from the issue date of the award
Third Party Agreements	Any agreement between the ACC and a third party to: • Deliver training and or assessment • Provide any form of marketing services (NOTE this can be the ACC providing the services or the ACC subcontracting the services)	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.