

## RECORDS MANAGEMENT PROCEDURE

<b>Approving authority</b>	Executive Management Team
<b>Purpose</b>	This procedure sets out the Institute’s records management systems and processes.
<b>Responsible Officer</b>	President and CEO
<b>Next scheduled review</b>	August 2026
<b>Document Location</b>	<a href="http://www.ozford.edu.au/higher-education/life-at-ozford/">http://www.ozford.edu.au/higher-education/life-at-ozford/</a>
<b>Associated documents</b>	All Institute policies and procedures

### 1. PRINCIPLES

Ozford Institute of Higher Education (herein referred to as the “Institute”) recognises that corporate records play a critical role in:

- supporting good business practices that aligns to the strategic direction;
- supporting service delivery, business continuity and good corporate governance;
- providing for evidence based and informed decision making;
- promoting accountability and transparency;
- supporting compliance with various legislative and regulatory provisions;
- capturing the corporate memory of the Institute; and
- providing evidence of what the Institute, its staff, students and stakeholders have (or have not) done, decisions made and any undertakings given.

The Institute is committed to establishing, maintaining and continually improving its records management practices, processes and culture, and strives to be compliant, effective and efficient.

The Institute’s records management processes are based on four overarching records management principles:

- Records Management must be systematic and comprehensive.
- Records Management is everyone’s responsibility.
- Records must be full and accurate and the systems that make, manage or keep them reliable and secure
- Records must be retained for as long as they are required and disposed of in a lawful, planned and approved manner.

### 2. SCOPE

This procedure applies to all staff and contractors involved in the Institute’s records management processes.

### 3. DEFINITIONS

#### *Accepted student*

Accepted student means a student (whether within or outside Australia) who is accepted for enrolment, or enrolled, in a course provided by the Institute.

***Archives***

Records relocated to long-term storage for preservation beyond their immediate business function, including permanent records.

***Confirmation of Appropriate Accommodation and Welfare (CAAW)***

A Confirmation of Appropriate Accommodation and Welfare (CAAW) is issued via PRISMS to confirm that appropriate arrangements have been made for the student's accommodation, support and general welfare. The period nominated must be at least the length of the student's Confirmation of Enrolment (CoE) plus 7 days at the end of the CoE or until the student turns 18.

***Confirmation of Enrolment (CoE)***

The Confirmation of Enrolment (also called a CoE) is an official statement from the Institute via PRISMS that lists the student's details, course and the start and end dates of the course.

The Confirmation of Enrolment (COE) is an official document issued to international students by universities and other education providers in Australia. It confirms that the student has accepted a place in a course and has paid required tuition fees and Overseas Student Health Cover (OSHC). The COE is required by the Department of Home Affairs for the purpose of issuing a student visa.

***Corporate Memory***

The accumulated body of data, information and knowledge created in the course of an organisation's existence.

***Disposal:***

Destroy or abandon the record.

***Evidence***

Information (captured or represented in a record or other record) that is used to prove a fact.

***Records:***

Records information in any form including data in computer systems, created or retrieved and maintained by the Institute and kept as evidence of activities.

***Provider Registration and International Student Management System (PRISMS)***

Means the Provider Registration and International Students Management System (the electronic system that holds CRICOS and the electronic confirmation of enrolment).

## **4. PROCEDURE**

### **Staff training**

- 4.1 Record keeping is an essential function, and all staff are expected to consistently create, capture, access, store and manage records as part of normal business practice.
- 4.2 All staff receive an induction on appointment and are provided with information about the Institute's records management systems and processes. This includes that all staff must comply with the ***Privacy Policy and Procedure***.

### **Capturing and classifying Institute Records**

- 4.3 Records must be made at the time of, or as soon as practicable after, the event to which they relate. Records must include adequate contextual information or metadata for them to be meaningful, retrievable and usable. Records must be organised and managed to preserve their context and ease of retrieval.
- 4.4 Electronic records must be stored in an Institute approved business system.
- 4.5 Staff creating or receiving records using electronic devices such as email, text, messaging systems, etc. must record this information into the Institute's systems.
- 4.6 Staff should not hold (store) physical or electronic records outside the Institute's systems. Staff must not store records on laptops, desktops, temporary storage devices and portable drives.
- 4.7 Physical records must be stored securely to avoid possible theft, misuse or inappropriate access
- 4.8 Official social media content published by the Institute is stored within the particular social media platform where the original content was posted. eg Facebook, Instagram, WeChat etc

### **Accessing Institute Records**

- 4.9 Throughout their full retention period, records must be actively managed and organised to preserve context, accessibility and usability.
- 4.10 Records must be stored in conditions suitable to the:
  - length of time they must be kept;
  - nature of the record content (eg personal, confidential or sensitive information); and
  - format of the record or the medium it is kept on
- 4.11 Access to the Institute records is only permitted by authorised staff.
- 4.12 Users of records and files are accountable for the records/files while they are in their custody including appropriately protecting the records/files from unauthorised access.
- 4.13 Hard copy records stored within business areas must be secured to avoid possible theft, misuse or inappropriate access.
- 4.14 Access to all official social media platforms is controlled by the Marketing team and limited to authorised users only.
- 4.15 Any contributions to social media platforms by staff are controlled by the ***Staff Code of Conduct Policy and Procedure.***
- 4.16 Personal information held on corporate records must only be used for the purpose with which it was collected and must only be disclosed to authorised persons. Records containing personal information

must be captured, stored, accessed, and disposed of in line with the requirements of relevant legislation (including, but not limited to the Information Privacy Act, Freedom of Information Act and Public Records Act).

- 4.17 All staff must ensure their username and password for the Institute systems are kept secure at all times and are not shared with anyone else under any circumstances.
- 4.18 All records kept at the Institute, including records of breaches to academic integrity (by staff or student), allegations of academic misconduct, and assessment results, student records, student progression and student completion, can only be accessed by the Executive Management team.

### **Archiving Institute Records**

- 4.19 Physical records no longer required for normal business activities must be appraised to determine if they are to be transferred to offsite storage.
- 4.20 The Institute may archive records onsite or engage a service provider for the ongoing storage of its archived records.
- 4.21 All physical documentation is archived as required by staff and management. Archive boxes are to be clearly labelled.

### **Disposal of Records**

- 4.22 Records must be retained for the minimum retention periods specified in this procedure as set out in *Appendix 1*.
- 4.23 Records cannot be disposed of if:
- they are identified as having historical significance and / or are classed as a permanent record;
  - they have not met the minimum retention timeframe;
  - it is known that the records may likely be required in evidence, either now or in the future;
  - it is identified that there is still a business requirement for the records to be retained.
- 4.24 The destruction of any record must be undertaken in a secure manner as appropriate to the format.
- 4.25 Most of the Institute's physical records are stored for 7 years. At the end of this period the documents are shredded.
- 4.26 Some Institute, student and staff records that are kept for longer than 7 years as set out in this procedure and Appendix 1.

### **Computer Data Back-up Procedure**

- 4.27 The ITS Services team ensures the back-up on a nightly basis. Contents of the shared drives are backed up to local backup server and tapes. The tapes are stored securely offsite with a tape management company.

- 4.28 Back up for network drive that contains students' records of attainments of units of competence and qualification are retained for a period of 30 years.

### **Electronic Records**

- 4.29 Any on-line documentation regarding the quality system is updated as required on- line.
- 4.30 Printed out-of-date documentation is to be destroyed by relevant staff members securely as soon as they have been notified of any amendments to documents. Out-of-date documents are to be placed into the locked security bins or shredded in-house.
- 4.31 On-line information is stored in appropriate folders on the computer by the responsible staff member(s).

### **Financial Records**

- 4.32 The financial records are archived at the end of each financial year. The data is placed into archive boxes, clearly labelled and stored for 7 years. At the end of this period the documents are shredded.
- 4.33 The Institute will maintain up to date records of financial information including fees paid and refunds given.

### **Student Records**

- 4.34 The Institute must keep a record of each accepted student who is enrolled or who has paid any tuition fees for a course and upon the student commencing enrolment in the student management system and in the PRISMS system.
- 4.35 The records must consist of the following details for each accepted student:
- the student's enrolment records including signed acceptance agreement, payment record,
  - the student's personal details including residential address, mobile phone number, email, address and passport number;
  - credit transfers or exemptions granted;
  - any other details prescribed by the ESOS regulations (applicable to international students on student visa only).
- 4.36 As part of Orientation, the following information for each student upon commencement is confirmed:
- the student's personal information including name, date of birth, and medical condition;
  - the student's contact information including Australia residential address, mobile phone number, email address, and emergency contact details.
- 4.37 The student information will be entered onto the PRISMS system, the Student Administration system and scanned in secured network drive. Student files will be maintained for two years after the student ceases to be an accepted student in a secure network drive after which time they will be deleted.

- 4.38 If the Institute grants RPL or course credit to an overseas student, the Institute will give a written record of the decision to the overseas student to accept and retain the written record of acceptance for two years after the overseas student ceases to be an accepted students. The record will be entered onto Student Administration systems and scanned in secured network drive.
- 4.39 The Institute ensures that, at least every 6 months, while the student remains an accepted student:
- the Institute as part of each semester's enrolment confirms, in writing, the details referred to above with the student; and
  - the student management system and the PRISMS system are updated accordingly:
- 4.40 Student personal and contact information will be maintained for two years after the student ceases to be an accepted student in a secure network drive after which time they will be disposed.

## Assessment Records

- 4.41 Assessment records will be maintained for every enrolled student and will include all assessment tasks for each unit within an enrolled course.
- 4.42 Assessment records for each enrolled student will include grades assigned on the completion of individual units. This also includes the administration, recording and reporting requirements, and may address a cluster of assessment tasks as applicable for holistic assessment.
- 4.43 Completed student assessment items are the actual piece(s) of work completed by a student or evidence of that work, including evidence collected for Recognition of Prior Learning (RPL) process. An assessor's completed marking guide, criteria, and observation checklist for each student may be sufficient where it is not possible to retain the student's actual work. However, the retained evidence must have enough detail to demonstrate the assessor's judgement of the student's performance against the standard required.
- 4.44 The Institute will securely retain all completed student assessment items for each student, as per the definition above, for a period of six months from the date on which the assessment of the final unit grade for the student was made.
- 4.45 The Institute will retain copies of all assignments, examination booklets and other assessment materials for two years after the completion date of the unit. Specifically, the Institute keeps the following information in relation to each unit:
- a copy of all assessment tasks, including tests, assignments, role-plays and projects provided to students for the unit;
  - a copy of any workplace log or workbook required for students to satisfy Work Integrated Learning (WIL) requirements;
  - a copy of any moderation reports for the unit; and
  - identification of the people involved in delivery and assessment of the unit.

### **Student Progression Records**

- 4.46 The Institute must keep and maintain a record of each student progression during their enrolment at the Institute.
- 4.47 The progression records must consist of the following details for each student:
- the student's enrolled units and unit outcome (student transcripts);
  - if student is identified as at risk of course progress: letters issued to student to inform progress and intervention meeting record.
- 4.48 Student progression will be maintained for two years after the student ceases to be an accepted student in a secure network drive after which time they will be deleted.

### **Staff and student incident records**

- 4.49 Incidents that the Institute must keep and maintain a record include:
- formal complaint by staff and students;
  - allegation of student or staff misconduct;
  - breaches of academic integrity;
  - student or staff critical incidents (refer to *Critical Incident Policy and Procedure*).
- 4.50 The records must consist of the following details for each incident:
- details of incident including date and summary of incident;
  - management and outcome of the incident;
  - evaluation of the incident (if available).
- 4.51 The records will be entered onto Student Administration system, or the Staff management system and records scanned in a secured network drive.
- 4.52 Where the incident related to misconduct or a breach of Institute policy, the records will be retained indefinitely.
- 4.53 Other incident record will be maintained for two years after the student or staff member ceases to be an accepted student in a secure network drive after which time they will be disposed of.

### **Student Completion and Award of Qualification Records**

- 4.54 The Institute must keep and maintain a record of each student upon student completion of enrolment at the Institute.
- 4.55 The records must consist of the following details for each student upon completion:
- a) student full academic record (statement of result);
  - b) award of qualification issued (Refer to Conferral of Academic Qualifications Policy and Procedures).

4.56 The Institute's student completion and award of qualification records will be maintained for a period of 30 years.

#### **Staff records**

4.57 The President and CEO, Academic Dean, academic staff and relevant administrative staff are responsible for maintaining up to date records of the verified academic qualifications and experience of all staff and persons working on behalf of the Institute. These documents are kept secured in the Accounts office.

### **5. QUALITY ASSURANCE**

To ensure that this procedure is fit for purpose and meet the requirements of the HES Threshold Standards the procedure will be:

- 5.1 internally approved by the Executive Management Team on development or review;
- 5.2 externally reviewed as part of any independent review of the HES Threshold Standards approved by the Governing Board;
- 5.3 internally reviewed by the Responsible Officer every three years from the date of approval (if not earlier);
- 5.4 referenced to the applicable HES threshold Standard and/or other legislation/regulation.

### **6. FEEDBACK**

Feedback or comments on this procedure is welcomed by the listed Responsible officer of the Institute.

### **7. ACKNOWLEDGEMENT**

This procedure was developed with reference to the following:

- Ozford College of Business, Records Management Policy, January 2016.
- Australian Catholic University, Record and Archive Management Policy, 2022 ([ANU Policy Library - Policy - Records and archives management](#))
- Federation University, Records Management Procedure, 2023 ([Records Management Procedure \(federation.edu.au\)](#))
- [Records Management Policy - Policy - JCU Australia](#)
- [Records Management Handbook.pdf \(adelaide.edu.au\)](#)
- [Records Management Policy \(unimelb.edu.au\)](#)
- [Records Management Policy | University of Technology Sydney \(uts.edu.au\)](#)



Racial and Religious Tolerance Act 2001 (Vic) Spent Convictions Act 2021
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Note: EMT = Executive Management team

## Appendix One: Institute Records Retention and Disposal Schedule

Activity	Description	Retention
Accreditation and registration	The activity associated with seeking institutional accreditation or registration as an educational provider e.g. with the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) and the Tertiary Education Quality and Standards Agency (TEQSA). Records relating to external quality assurance audit by TEQSA. Includes: submissions to TEQSA; audit reports; responses to audit reports.	Retain permanently
Agreements	Records of contracts. Includes records associated with the negotiation process.	Destroy 7 years after last action
Celebrations & Ceremonies - Routine	Records relating to routine functions that are not of major significance to the history of the Institute.	Destroy 7 years after last action
Committees – Strategic	Records relating to internal governance committees and sub-committees or external committees.	Retain permanently
Committees - Operational	Records relating to the activities of internal committees that consider operational matters and issues.	Destroy 7 years after last action
Complaints & Complaints Register	Records relating to complaints or suggestions received by the Institute. Summary documentation of complaints detailing the type of complaint and how resolved.	Retain permanently
Compliance	Records relating to the compliance with rules, specifications, policies, standards or laws. This also includes registration with various bodies, including financial and business-related bodies.	Retain permanently
Consultants & Contractors	Records relating to the activities associated with managing use of consultants and contractors, including contracts.	Destroy 7 years after last action

Activity	Description	Retention
Corporate incorporation, registration and symbols	<p>Records relating to the Institute's incorporation and registration</p> <ul style="list-style-type: none"> <li>• the corporate identity. Includes design and format of the Crest, brand mark(s), testamurs, common seal,.</li> <li>• registration of seal and trademarks.</li> <li>• registers of directors, secretaries and managers; register of trustees; registers of charges, seal registers.</li> <li>• Certificates of Incorporation; Corporation Constitution; Memorandum and Articles of Association; Seal Records.</li> </ul>	Retain permanently
Course Approval	<p>Records relating to the approval and/or accreditation of curricula. Includes master set of approved curricula. Also includes external accreditation by professional or registration bodies. Master copy of course and subject outlines.</p>	Destroy 7 years after last action
Course Development and Review	<p>Records relating to the development of curricula for university courses. This includes the initiation or discussion of proposals, as well as working papers, committee records, input from advisory groups. Records relating to internal or external reviews of curricula. Includes working papers, course alteration proposals, draft revised subject outlines, unapproved curriculum revisions.</p>	Destroy 7 years after last action
Course Delivery - Subject Resources & timetables	<p>Resources and materials used in course and unit delivery. Includes study guides, readings, self-assessment exercises, audio-visual teachings aids and lecture notes. Includes timetables, rosters, organising venues, teaching allocations.</p>	Destroy 2 years after last action

Activity	Description	Retention
Critical incidents or Accidents	Records relating to critical incidents and accidents where an staff, contractor, student or visitor is affected, injured or incapacitated on Institute premises. Includes injury register.	Retain permanently
Data Breach	Records relating to security breaches affecting information resources, and the investigation and reporting on of such breaches in line with data breach response procedures.	Retain permanently
Disposal – Assets and Collection Items	Records relating to the disposal of assets.	Destroy 7 years after last action
External Organisations, Joint ventures	Records (including general correspondence) relating to ongoing contact between the Institute and external bodies.	Destroy 7years after last action
Financial Delegations	Records relating to the process of delegating power to authorise a financial activity. Includes appointment of an officer to countersign cheques, delegation to approve expenditure.	Destroy 7 years after last action
Financial records	Financial and accounting records. Records relating to any insurance policies or programs. Records relating to the administration and collection of tuition fees (other than student contribution fees) and library fines. Includes correspondence relating to outstanding fees, fines and non-payment.	Destroy 7 years after FY to which the records relate
Financial reporting	Final approved budget, financial reports and annual financial statements	Retain permanently
Financial obligations and taxation	Records relating to taxation matters. Includes income tax, fringe benefits tax (FBI), goods and services tax (GST), sales tax, payroll tax, fuel tax and pay as you go (PAYG).	Destroy 5 years after the FY to which the records relate or the last action, whichever occurs later.
Governance	Records relating to the Governing board, Academic board and committees. Includes Academic	Retain permanently

Activity	Description	Retention
	Board, Audit and Risk, Education Committees.	
Graduation	Records relating to academic dress protocol. Records relating to the proceedings of conferral of certificates at a ceremony. Includes protocols and transcripts of guest speeches. Master list of graduands.	Retain permanently
Intellectual Property - Copyright	Records relating to arrangements concerning the use of intellectual property. Includes correspondence, agreements, formal arrangements, and copyright declaration forms.	For contracts - destroy 7 years after the date upon which any cause of action under the agreement accrues or may accrue. Retain permanently when the Institute is the beneficiary or grantor of a perpetual intellectual property licence or other perpetual intellectual property rights.
ICT Backups	Copies of data used to restore the original after a data loss event.	7 years after last action
Leases - Hardware & Equipment	Records related to leasing items and equipment.	Destroy 7 years after lease expires
Legal Advice	Records relating to legal advice requested or received.	Retain permanently
Marketing	Records relating to routine marketing campaigns. Includes advertising campaigns, public launches and promotional images.	Destroy 7 years after last action
Misconduct, Misuse, Breaches of policy	Records relating to allegations and investigations into breaches of the Codes of Conduct and/or policies relating to conduct and behaviour for Staff, Students or partners. Records include allegations, investigations, disciplinary action and appeals. Includes academic and non-academic misconduct. Records relating to the misuse of corporate identity. Includes falsified transcripts, and fraudulent use of web content. Records associated with complaints or investigations about breaches of privacy.	Retain permanently

Activity	Description	Retention
	Records relating to investigations of misconduct that result in dismissal	
Planning - Strategic	Final approved strategic plans that have a major impact on the University's operations and strategic direction, i.e. Strategic Plan	Retain permanently
Policies and procedures	Final approved versions of policies and procedures.	Retain permanently
Records, Archiving Retention & Disposal	Records relating to retention and disposal activities, such as; sentencing, transfer procedures and arrangements, disposal activities.	Retain permanently
Reporting - Annual Reports	Master copy of annual reports. Includes reports prepared by faculties and schools, centres and institutes, and the University as a whole.	Retain permanently
Reporting - External	Final version of formal reports submitted to external organisations.	Retain permanently
Scholarships - Establishment	The activities associated with the establishment, rules and conditions of scholarships.	Retain permanently
Staff records and payroll information	<p>Personal files for all staff includes</p> <ul style="list-style-type: none"> <li>• recruitment</li> <li>• time sheets and rosters.</li> <li>• taxation declaration records, group certificates, payroll deduction authorities, records relating to the overpayments, and employee pay history.</li> <li>• staff training and development activities</li> <li>• leave requests. Includes applications for leave and any supporting documentation e.g. Sick leave certificates.</li> <li>• termination and redundancies.</li> </ul>	<p>Destroy 7 years after last action</p> <p>Where there is actual or suspected misconduct retain permanently</p>
Staff Position Description	Records relating to the creation, variation, abolition, transfer or reclassification of positions and assigned duties.	Destroy 7 years after the position has been altered or abolished

Activity	Description	Retention
Staff Register	Summary record of all permanent staff.	Retain permanently
Student Recruitment	Records relating to activities designed to attract student applicants.	Destroy 2 years after last action
Student Recruitment Agents	Records relating to the appointment of advertising and recruitment representatives or agencies. Includes agreements (but excludes deeds).	For contracts - destroy 7 years after appointment ceases, or agreement expires, whichever occurs later.
Student Admissions - Successful	Records relating to applications and offers that are successful and accepted.	Destroy 2 years after last action
Student Admissions - Unsuccessful	Records relating to applications which are unsuccessful.	Destroy 1 year after appeal period ends
Student Assessment - Academic result records	Official academic records of the results achieved by a student.	Retain for 30 years
Student Assessment - Appeals	Records relating to appeals about examination/assessment results.	Destroy 2 years after last action
Student Assessment - Assignments & Examinations	Essays, assignments, examinations and other forms of assessment completed by students but not collected by them or returned to them.	Retain for 6 months after last action
Student Assessment - Grading	Records relating to the marking of individual assessment items such as assignments and essays. Excludes the final result for a subject or course.	Destroy 2 years after last action
Student Enrolment	Records relating to student enrolment in a course or program of study. Includes enrolment forms; variations in personal details such as change of name or address; variation in course program. Also includes advanced standing, recognition of prior learning, course transfers, deferment, exemptions, eligibility issues, discontinuation or withdrawal.	Destroy 2 years after last action
Student File – Physical records	Personal file of individual students	Destroy 2 years after last action
Student File – Student management system	Records maintained by Student Administration that comprise a summary of student data on individual students. Includes student name, ID, date of birth, enrolment	Retain permanently

Activity	Description	Retention
	summary, academic records, misconduct findings, awards/courses completed.	
Surveys	Records relating to surveys of students, staff or stakeholders	Destroy 2 years after last action