

# Records Management and Privacy Policy

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## Purpose

Records Management Policy is to establish a records management process in accordance with relevant legislative and regulatory requirements, standards and best practices to ensure that records are properly created, managed and maintained.

## Scope

This policy applies to all the Staff.

## Objective

To ensure Institute records can be accessed in a timely manner and records are maintained in compliance with the regulatory requirements. In addition, collection, management, use, disclosure, protection, and disposal of personal information in accordance with the thirteen Australian Privacy Principles (APPs) outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

## Policy Details

Institute records should be:

- Managed in a consistent and structured manner accordance with regulatory requirements
- Stored in a secure manner
- Disposed of, or permanently archived, in accordance with the regulatory requirements

## Process and Procedure

### Record keeping

Records maintained by the Institute are:

- Administrative records such as student enrolments details, acceptance of agreements, payment details, formal communications with the students
- Students' academic results
- Qualifications and Statements of Attainment issued
- Completed students assessments
- Staff files
- Agents files
- Institute management records such as policies and procedures, data registers, enrolment registers, attendance records, financial records and records of grievances and appeals
- All other documentation necessary to develop, implement and maintain the Institute's quality system
- Financial Records

Records of results, Qualifications and Statements of Attainment for students currently enrolled and students that have ceased studies are stored in electronic format. Electronic files are kept up to date and are backed up regularly, with the backup copy being securely kept off site.

### Storage of Records

To ensure records are maintained in a safe and suitable condition, the following are to apply:

- Records must be kept securely to prevent them being accessed by any non-authorised personnel
- Records must be kept confidential to safeguard information and to protect the privacy of the students, staff and Institute
- Records must be kept to avoid damage by fire, flood, termites or any other pests
- Participant results and Qualification / Statements of Attainment must be backed-up in an electronic format and must be available to be retrieved at any time
- Electronic data storage must be safe from destruction by fire or flood and is backed up and stored in a secured cloud location

All hardcopy records are to be kept in the filing cabinet and are secured with a key at all times. Only authorised staff has access to the filing cabinet.

All electronic records are stored in the file server and are secured with access permission. Only authorised staff has access to relevant folders.

### Retention of Records

Different documents must be retained to ensure smooth operation of the RTO, and to provide evidence to the regulator or other authorised party of the quality of the service provided. Given below is the minimum retention period for a type or group of documents.

Document Type	Period of retention	Reason
<b>Enrolment and evidence of identity records</b>	Original documentation (or scanned copies) will be retained for a minimum of 2 years following cessation of their registration	Any issues relating to the original enrolment or funding entitlement must be able to be investigated.
<b>Record of results</b>	Sufficient evidence relating to the award of a certificate (together with record or results) or Statement of Attainment must be kept of 30 years	This data may be required to produce copy of certificates and must be available to be passed to the regulator in the event the RTO ceases to be registered
<b>Assessment Instruments</b>	All material used to assess a student must be stored in a way that a correct version of the assessment tools can be assembled that match a student assessment results. Minimum period is 6 months.	Accurate version control of documents essential to ensure that the same version of the tool can match a student's work for the regulator to review for a minimum of 6 months.

<b>Student assessment tools<sup>1</sup></b>	Full, complete and accurate set of student results for each student for each Unit / Cluster must be retained for a period of 6 months.	As above and to enable detailed verification to be undertaken.
<b>Trainers records</b>	Trainers details including skills matrices, and evidence of qualifications and all other person information to be retained the life the trainers employment / contract and for 2 years following cessation of employment. Note where multiple skills matrices/resumes have been collected over time, then only the most recent has to be retained.	Available for regulators to review as appropriate
<b>Financial Information</b>	To be retained in line with corporate regulations, normally for 7 years	As required by ATO and Companies Act.
<b>Management Records</b>	All records of formal meetings, quality activities including continuous improvement, validation and any complaints/appeals to be retained for a minimum of 2 years.	To enable to demonstrate a quality organised and managed organisation and to be available for regulatory audit as required.
<b>Third Party agreements</b>	Copies of all agreements to be retained for the life of the agreement and any period of enforcement following termination of the agreement.	To enable review or action based on the terms of the agreement

These record times will be revisited when the RTO contracts with a government funding body and or becomes registered for International Training delivery.

## Archive / Destruction of Records

When a record ceases to be current and in regular use, it may be archived. The records in archive will continue to be stored and handled to the same level of security described above.

When a record has been stored for at least the period identified above, the Institute may elect to destroy the records. Destruction will follow the following steps:

- Administration will identify records and place in a separate area.
- Records identified will be recorded with sufficient identity to be sure what the record is clearly understood, and the type of record (including for example Student ID and Staff Name).
- The list is to be checked against the selected files by the Administration Manager and the list signed by that person.

<sup>1</sup> The ASQA [General direction—Retention requirements for completed student assessment items](#)

- The list is to be counter signed by the CEO prior to destruction.
- The “destruction list” is to be retained.
- Documents approved for destruction must either be shredded on site or via a reputable document destruction company

## Disclosure of Personal Information

AIET does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming events), or if required by law.

Except as required under the Standards for NVR Registered Training Organisations, Government Contracts or by law, information about a student will not be disclosed to a third party without the written consent of the student. If any disclosure of information is required for any other purpose, AIET will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the APPs.

AIET does not disclose personal information including mailing lists to third-parties for marketing purposes. In addition, AIET does not disclose personal information to overseas recipients.

## Student Access to Personal Information

Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by AIET.

- Access by students to their personal records is available upon request to the Student Administration Manager. Students may contact student administration to discuss a suitable time to view their file and access will only be granted once a student can confirm their identification.
- Access shall be provided within 10 days of confirming the student’s identification.
- Information that may be accessed includes academic progress, statements of attainment, course completion letter, qualification certificate, personal details and any relevant details of the student’s enrolment that the Institute has on the file.

If the student identifies an error, then they should bring it to the attention of Student Administration to have the record corrected.

## Responsibility

Student Administration Manager is to ensure that procedures for the archiving and storage of records are applied. Administrative support staffs are also to liaise with Trainers and Assessors to ensure that approaches to records handling are consistent throughout.

Trainers and Assessors are to ensure that student’s academic records are appropriately filed during the training program.

## Associated Documents

- Request for Qualification or Statement of Attainment Form
- Student handbook

## Revision History

Version No.	Creation/ Revision Date	Comment	Created/ Revised by
1.0	01/10/2017	Policy and procedure created	CEO
1.1	23/03/2019	The addition sections have been added to include privacy issues and the policy has been renamed from 'Records Management Policy' to 'Records Management and Privacy Policy'	CEO