Records Management Policy and Procedure

1. Introduction

The Australian Performing Arts Conservatory (APAC) Records Management Policy and Procedure is designed to ensure that information systems, records and documents are maintained, secure and confidential in accordance with relevant regulatory and legislative requirements.

1.1 Purpose

The intent of this document is to provide a framework for the creation and management of information and to ensure that records are created, maintained, managed, and disposed of using best practice and in accordance with relevant regulatory and legislative requirements.

The Policy and Procedure set out to:

- ensure that a consistent governance and management approach is adopted in the creation and management of records.
- establish clear responsibilities for individuals and decision-making bodies in the retention, sharing and disposal of records.
- enable compliance and best practice around information system security, record, and document security.
- provide clear understanding of and adherence to regulatory and legislative requirements.

1.2 Scope

The Records Management Policy and Procedure applies to all APAC staff, students, and members of APAC decision making and advisory bodies who are engaged in creating, reviewing, managing, sharing, and disposing of such documents. It applies to all aspects of APAC business and across all formats including physical (hard copy) records, digital records, records held in databases (including websites) and other technology dependent records.

1.3 Principles

APAC will ensure that records are managed according to this Policy and Procedure and meet all regulatory requirements. The following principles apply:

- All records are accurate and have integrity.
- All records will be retained, managed and disposed of as per legislative requirements.
- All records are accessible for the relevant business contexts.
- All management system records are the responsibility of the personnel listed on the Retention Schedule at Appendix 1.

- All student information is confidential and is only made available to the students themselves, to a person authorised by them or when requested to do so by a legal authority.

2. Policy Statements

APAC is committed to ensuring that.

- Records are made at the time of the event to which they relate, or as soon as possible after.
- All records are retained in accordance with relevant retention and disposal schedule.
- All records follow APAC 'best-practice' nomenclature.
- All vital, high-risk, high-value, confidential and permanent records are appropriately labelled and managed as such.

2.1 Creation of Records

Records may be created for various purposes. Records should be developed using appropriate version control where applicable, particularly for policies and procedures, and other similar documents that will undergo revision from time to time.

APAC Records are classified into three types:

- Student Records
- Staff Records
- General Operations (including insurance and finance records)

2.2 File Naming Conventions

Naming conventions will follow APAC 'best practice' to ensure consistency and ease of record discovery.

2.3 Retention and Storage of Records

APAC is committed to ensuring that;

- All confidential information is kept securely and safeguarded;
- All confidential hardcopy records are kept under lock and key;
- All electronic records are access limited and password protected where required.

2.4 Disposal of Records

Official records must be disposed of in accordance with the relevant legislation and minimum retention period as per the Retention Schedule at Appendix 1.

3. Procedures

3.1 Creation of Records

The following sections provide detailed information on the creation of records and records management procedures.

Documents should be created using the appropriate format for the type of document. The following three types of records are used at APAC:

- Student Records: These documents are maintained by APAC and directly relate to a student.
- Staff Records: These documents are maintained by APAC and directly relate to a staff member, committee or board member and any contractors.
- General Operations Records: These documents relate to the operations or administration of APAC will include documents such as financial and insurance records.

All documents should be clearly identified as being either a student record, staff record, or general operations record. Further to this, the content of documents is encouraged to include sensitivity labels such as:

- Personal: content that relates to a staff member, board member or student such as employment details, contact details, student identification details.
- Public: content that is general use and contains information that is not sensitive in nature and can be shared publicly both internally and externally.
- General: content that is common knowledge or general in nature for the running of APAC such as policy and procedure documents, guides, internal processes.
- Confidential: content that is not to be shared outside set user permissions or externally. Confidential information will include things such as customer lists, pricing lists and information, business plans and strategies.
- Highly Confidential: Highly Confidential content is the most sensitive type of information and may require legal notifications if breached or otherwise disclosed. These documents require the highest level of control and security, and access should be limited to "need-to- know".

To maintain their value as evidence, records must be created and preserved in such a way that they cannot be altered or manipulated for as long as they are retained.

3.1.1 Naming Convention

To maintain their value as evidence, records must be created and preserved in such a way that they cannot be altered or manipulated for as long as they are retained.

The following best practices will be followed when creating and naming APAC records.

- File names should not include punctuation such as commas, slashes, colons, or semicolons as it causes issues with some software systems.
- Spaces may be used to separate words in a title.
- Hyphens may be used if a word is usually hyphenated, but not to separate words.
- Hyphens may also be used to point out another subject in the document title, such as the version number.
- It is preferable to use titles that group files together in some instances, such as the Minutes example. Consider whether this would be useful when searching for files.

- It is preferable that no names of people or dates are used in titles; instead, please use a consecutive version number.

Examples of Titles are as follows:

Records Management Policy-v1

Minutes Academic Board Meeting 010915-v0.02

3.1.2 Version Control

Controlled documents such as policies should include a Revision History and Drafting Table. These tables should be completed by staff to keep a record of version history and approvals.

Policy Category	Operational	Approval Date	
Document Owner	Admissions and Compliance Manager	Approval Authority	The Board of Directors
Audience	Staff and Students	Review Date	
Revision History					

Version	Author	Change Summary	Date Approved	Date Effective
0.1	DVE Business Solutions Pty Ltd	Initial Draft		

The following information should be inserted in the footer of the document, using Word's 'Insert Field' functions, so that titles and page numbers are automatically updated.

- Title of Document
- Version Number
- Page Number (X of Y format)

Example: Records Management Policy-v0.1   Version No. 0.1   Page 1 of 2

Initial drafts of a controlled document should commence with version 0.01 and continue with increments of 0.01 to reflect subsequent changes. The final version of the controlled document will commence with version number 1.0. Minor revisions will proceed with increments of 0.01, for example 1.1, 1.2 and so on. Major changes will increase by whole number increments, for example 1.0, 2.0, 3.0 etc.

3.1.3 Document Register

A document register shall be maintained for all controlled documents. It should include the following:

- Document title
- Version number
- Document contact
- Date created
- Date revised
- Date of approval
- Approving authority
- Comments on history or reasons for review

3.1.4 Document Approval

New documents or final revised drafts of documents should be circulated to appropriate personnel or committees prior to seeking approval from the relevant approval authority.

Minor changes such as grammar or spelling amendments, or updates to web links are not deemed as changes to content and are therefore exempt from the approval process.

Once approved, the final controlled document is distributed to all relevant personnel, students or stakeholders and uploaded to APACs website.

3.2 Retention and Storage of Records

Records are retained in the office while files are active, before being transferred for archiving in secure storage in either a hardcopy or electronic format. Archiving will generally occur once a student or staff member leaves APAC, or at such other time as the record is deemed to be no longer active.

There are external reporting requirements that must be adhered to such as:

- State and Federal Government bodies may require student course data records to be submitted in a format to suit their systems.
- APAC will supply such data as determined by relevant legislation and regulatory requirements.
- All records submitted to State and Federal Government bodies are carried out using compliant reporting software, which dictates the data and format required for submission. The person responsible is to ensure that data submission has been effective.

3.2.1 Student Records

APAC uses Paradigm as its student management system (SMS) and Moodle as its learning management system (LMS) for higher education to record electronic records.

Student files are stored in a locked filing cabinet and/or as a secure digital record with access provided only to those authorised to view them.

Examples of records are:

- A student file (which may include electronic and hard copy records) will consist of:
  - records of fees paid and outstanding in relation to their course.
  - written agreements made with students.
  - all correspondence and records of contact with the student.
  - copies of all student assessments.

- Student assessment records are retained for every student initially for appeal or review and ultimately, so APAC maintains the ability to re-issue the actual qualification testamur or statement of attainment.

- Academic records will be retained as per the Retention Schedule and relevant legislation or regulatory requirements. The records are to contain sufficient information for APAC to reissue the qualification or statement of attainment upon request.

Completed assessments are retained as per the Retention Schedule. APAC disposes of completed assessments securely in the first week of December and the first week of June, each year.

3.2.2 Staff Records

All staff have a personal file for the storage of all essential records. Records of validated qualifications are maintained, together with certified copies of qualifications and a resume. Such information on qualification and experience is updated annually by the Administration Officer/ Administration Manager.

Records are kept in either electronic format or hard copy and scanned to a secure server. Only authorised personnel will be given access to staff records. Authorised access will be determined and approved by the Chief Executive Officer (CEO). Access will typically be provided to the Administration Manager, Director of Higher Education and CEO.

3.2.3 General Operations Records

Records are retained in the office while files are active, before being transferred for archiving in secure storage in either a hardcopy or electronic format. Archiving will generally occur once a student or staff member leaves APAC, or at such other time as the record is deemed to be no longer active.

APAC records will consider external reporting requirements and ensure that documents are retained and managed in such a way that they may be readily available for the following.

- State and Federal Government bodies may require student course data records to be submitted in a format to suit their systems.

- APAC will supply such data as required from the SMS in the format determined by the relevant regulatory body.

- All records submitted to State and Federal Government bodies are carried out using compliant reporting software, which dictates the data and format required for submission. The person responsible is to ensure that data submission has been effective.

3.2.3.1 Financial Records

All APAC's financial documents required by the Australian Taxation Office are retained as per the Retention Schedule. APAC uses MYOB and XERO to record financial transactions which is linked to the external Accountant via the Cloud. The Administration Officer and Administration Manager are authorised to access financial records.

3.2.3.2 Insurance Records

The Finance department retains the originals of Insurance Policy documents and Certificates of Currency. Any activity at APAC that may involve insurance policy is referred immediately to the finance department. All inquiries from insurance companies must be referred to the finance department. Staff must adhere to the confidentiality agreement and not inform third parties, including media, and insurance investigators about an incident or a claim, unless instructed by the finance department or by an Australian Court.

3.3 Disposal of Records

Once records have passed the minimum retention period as per the Retention Schedule at Appendix 1, and it has been decided to dispose of the records, hard copy records must be destroyed by industrial disposal.

3.4 Accessibility of Records

Information about students, staff, and board members is confidential and is not disclosed to any third party. Staff members, board members and students have the right of access to their own personal file at any time. To access personal files, students are required to contact the Higher Education Director, staff members are to contact the Administration Manager and Board members are to contact [input from APAC].

Students may allow third party access to their personal file by providing written permission to the Higher Education Director outlining the nature of information that may be accessed. Upon enrolment, students sign a confidentiality waiver to allow government authorities to access their academic and personal details on demand.

4. Responsibilities

All APAC staff are responsible for ensuring the awareness of and compliance with this policy and procedure and any associated policies and procedures. The consequences of breaching this policy and any associated policies result in time lost, money expended in locating or inability to retrieve records and information and can lead to failure to comply with relevant regulatory guidelines and legislation.

Known breaches of this policy and procedure are reported directly to the Admissions and Compliance Manager for review by the CEO and possible investigation by the Board of Directors. Charges of misconduct will be enacted in accordance with the Student or Staff Code of Conduct.

4.1 Board of Directors (the Board)

The Board of Directors is responsible for review and approval of this policy and all nonacademic documents of record. The Board is also response for the review and approval of this Policy.

The Policy is to be implemented via induction and training of staff and distribution to students and APAC's higher education community via the website and other publications.

4.2 Academic Board

The Academic Board is responsible for the review and approval of academic documents of record and to provide advice on nonacademic documents of records where relevant.

4.3 Staff

The approval authority will depend upon the classification of the policy and procedure document. The decision of the Approval Authority is final.

4.4 Students

Students are to ensure that they have reviewed and adhere to the Student Code of Conduct and the relevant information provided at Orientation and in the Student Handbook.

4.5 Administration Team

The Administrative team are responsible for ensuring records accurately and completely represent the transaction, activity, decision, discussion or undertaking made.

The team is also responsible for ensuring records are retained for as long as required and disposed of as per relevant legislation and regulatory obligations.

5. Relevant Documents

- APAC Admissions Policy and Procedure
- APAC Financial Practice Policy and Procedure
- APAC Governance Framework
- APAC Staff Code of Conduct Policy and Procedure
- APAC Staff Development Policy and Procedure
- APAC Staff Recruitment and Performance Policy and Procedure
- APAC Student Code of Conduct
- APAC Student Complaints and Appeals Policy and Procedure
- Tertiary Education Quality and Standards Agency (TEQSA) Act 2011
- Higher Education Standards Framework (Threshold Standards) 2021
- The Education Services for Overseas Students (ESOS) Act 2000
- Higher Education Support Act 2003 (the Act)
- Higher Education Provider Guidelines 2012 (the Guidelines)
- Standards for Registered Training Organisations (RTOs) 2015
- Privacy Act 1988

6. Definitions

- **Electronic Records:** 'information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business' (AS ISO 15489.1-2002 Australian Standard Records Management Part 1: General)
- **Records Management:** 'the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records' (AS ISO 15489.1-2002 Australian Standard Records Management Part 1: General).

Version Control and Document Owner

Policy Category	Operational	Approval Date	19 October 2022
Document Owner	Admissions and Compliance Manager	**Approval Authority**	The Board of Directors
Audience	Staff and Students	**Review Date**	October 2025

Revision History				
Version	**Author**	**Change Summary**	**Date Approved**	**Date Effective**
1.0	APAC	New document.	15 April 2016	
1.1	APAC	Current.	9 June 2017	
2.0	APAC	Zoom recordings added.	21 October 2020	
3.0	DVE Business Solutions Pty Ltd	Review and update of policy and procedure.	19 October 2022	
3.1	DVE Business Solutions Pty Ltd	- Updates to relevant documents under section 5 - Addition of point 2 under principles, section 1.3		31 August 2023

Appendix 1 – Retention Schedule

This Retention Schedule outlines the period that key records will be kept by APAC.

Type of Record	Retention Period	Person Responsible
Administrative and Management Records	Retained for a minimum of 7 years. This requirement relates to the versions of these records and completed records.	Administration Manager
Financial Records	Minimum of 5 years, or as required by the Australian Taxation Office	CEO
Human Resource Files	Minimum of 5 years in digital format, after the employee leaves	Administration Manager
Lecture Recordings	One trimester, plus one.	IT
Policies and procedures	Minimum of 1 year in digital format, after version has been made obsolete	Administration Manager
Records of all requests from overseas students for a release and the assessment of, and decision regarding, the request.	Minimum of two years after the overseas student ceases to be an accepted student (Standard 7.7 of the National Code).	Administration Manager
Records of all written agreements as well as receipts of payments made by overseas students under the written agreement.	Minimum of two years after the person ceases to be an accepted student (Standard 3.6 of the National Code).	Administration Manager
Records of any critical incident and remedial action taken involving overseas students.	Minimum of two years after the overseas student ceases to be an accepted student (Standard 6.8 of the National Code).	CEO
Regulatory Authority Documents/Applications	Minimum of 10 years in digital format, after the documents/application have been submitted	CEO
The written record of the decision relating to the granting of RPL or course credit to an overseas student.	Minimum of two years after the overseas student ceases to be an accepted student (Standard 2.4 of the National Code).	Administration Manager