Records and Information Management Policy

Policy Owner	CEO
Approving Authority	Governing Council
Implementation Responsibility	CEO
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1. Purpose

This policy has been created to ensure the proper management of SPI records and establish guidelines for the creation, maintenance and disposal of records in an appropriate manner.

Sydney Polytechnic Institute (SPI) will collect information from current and prospective students, and staff, either electronically or in hard copy format, including information that personally identifies individuals. SPI may keep communications records in various forms between individuals and SPI.[1]

Collected information and records shall be used primarily for administrative, security or business-related purposes, as well as to meet legal obligations.

2. Scope

This policy applies to all electronic, hard copy and hand-written document and records kept within SPI. SPI emphasises that records are the physical property of SPI and not of the staff member who created them or received them.

3. Definitions

Appraisal: The process by which decisions regarding the creation, disposal and retention of records are made. This includes an assessment of various factors such as business activities, business needs, legislative or regulatory requirements, and organisational accountabilities.
Archive: To retain and maintain records indefinitely.
Classification Scheme: Assignment of records into categories based on their functionality in a consistent and logical manner.
Destruction: To irretrievably and permanently destroy a record by physical or digital means.
Disposal: Refers to the actions of and related actions to facilitate the retention or destruction of records.
Disposal Schedule: A schedule that stipulates the time or conditions by which the disposition of records must take place.
Disposal trigger: An event from which the date of disposal is directly calculated, including the expiry of contracts or actions completed/superseded.
Document: A record of any information and maybe in physical or digital formats. Documents are treated as a unit of information.
Record: Any information, regardless of format or source, that is compiled, received, created or stored by SPI.

[1] In collecting personal information, SPI complies with the requirements of the Australian Privacy Principles (APPs) set out in the Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012. This policy states how SIPI collects, manages, uses, discloses, protects and disposes of personal information in accordance with the Act, Legislation and Principles.

Record Management System: The process by which records are captured and maintained, creation, receipt or disposition of records in a proper manner.
Retention: The keeping and maintaining of a record for a temporary or indefinite period based on the record's continued functionality or necessity. This includes the transfer of records to secondary storage or archives.
Sentence: A decision regarding the immediate or future disposal of a record following a process of identification and classification by a recognised authority.

4. Role and Responsibilities

4.1 All SPI staff and employees must:

- Familiarise with and/or encourage students to familiarise with the proactive measures to retain security, such as
  - Encourage students to regularly change passwords (as part of orientation program prior to the commencement of each teaching period);
  - Monitoring of website access by IT staff for unusual activity;
  - Security review of IT will be conducted every 12 months;
  - Licencing of protective software of SPI;
  - Secure transmission of material;
  - Store and back up information appropriately;
- Ensure that the records for which they are responsible and create are accurate;
- Ensure that the documents for which they are responsible are maintained in accordance with this policy and all relevant SPI policies;
- Ensure that the confidential information for which they are responsible are protected from unauthorised or public access; and;
- Undergo the record management training provided during their orientation program.

4.2 Regular and consistent audits of records management, as well as related activities, will be conducted by authorised SPI staff.

4.3 It is the responsibility of the SPI Chief Executive Officer (CEO) and Risk Committee to ensure that the institute meets the standards and principles set out by this policy.

4.4 It is the responsibility of the SPI Governing Council to consistently and regularly monitor the implementation of this policy.

4.5 It is the responsibility of the CEO to oversee and ensure the proper management of records at the operational level, in compliance with this policy. This includes the responsibility of maintaining a Repository of Publicly Available Information (RPAI) regarding SPI's operations via the SPI Website. Section Managers will regularly report to the CEO regarding the status of their records management.

4.6 Section Managers are responsible for their assigned records for management, as listed in the table below:

Records	**Section Manager**
Student Records	Registrar
Curricula and Academic Records	Academic Dean

Financial Records	Finance Manager
Marketing Materials	Marketing Manager
Staff & Payroll Records	HR Manager
Legal, Regulatory & Contractual Records	CEO
Library Records	Librarian
IT System and Electronic Records	IT Manager
WHS and Critical Incident Records	CEO

5. Collection and use of personal information

5.1 SPI only collects personal information from individuals by fair and lawful means which is necessary for the functions and legislative compliance of SPI. Information will only be collected with the consent of the individual and if that information is reasonably necessary for the functions of SPI.

5.2 SPI's website may collect information through mechanisms such as cookies or server access logs and use it to measure traffic patterns, improve the online experience, and monitor and manage marketing activities. No personal information shall be collected by these tools.

5.3 Where an individual believes that SPI breached a privacy principle in relation to that individual, they may lodge a complaint or grievance, using SPI's *Complaint and Grievance Resolution Policy and Procedure*, which enables current students and prospective students to lodge grievances.

5.4 This Records and Information Management Policy is accessible for current students and prospective students through the SPI website. In order to ensure that students have given their informed consent for their personal information to be disclosed to certain third parties as outlined in this procedure, the SPI will advise students on enrolment about these procedures and where they are located.

6. Disclosure

6.1 **Confidential and Non-confidential Information**

- Confidential information should not be disclosed outside SPI and in some cases, the information is limited to specified staff of SPI. In case of doubt, the decision as to whether or not a document is confidential should be referred to the Registrar of the Operational Management Team.
- Non-Confidential information is not subject to confidentiality but might be subject to Section 9 *Documents and Records Version Control*.

6.2 **Personal Information**

SPI will not disclose an individual's personal information to another person or organisation. Any person or organisation that collects information on behalf of SPI or to whom personal information is disclosed must not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

However, the exceptions for disclosing personal information exist where:

a) the individual concerned has given written consent to the disclosure;
b) the individual concerned is aware, or made aware that information is usually passed to an entity;
c) the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person;
d) the disclosure is required by law

7. Access

7.1 External parties shall have no access unless appropriately authorised by the CEO and the Risk Committee. However, only copies may be provided to external parties upon approval, unless originals are required by law.

7.2 Persons designated by the CEO and the Risk Committee have access to documents and records, as required within their areas of operation. All staff members have limited access to documents or records as applicable to their positions.

- Where SPI has no further use for personal information for any purpose disclosed by SPI or is no longer required to maintain that personal information by law, all reasonable steps will be taken to destroy or de-identify the information.

7.3 Individuals have the right to access and obtain a copy of the personal information that SPI holds about them. Requests to access or obtain a copy of personal information must be made in writing and sent to the Registrar of the Operational Management Team. Individuals will be advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 working days of receiving their written request.

- There is no charge for an individual to access personal information that SPI holds about them; however, SPI may charge a fee to make a copy.
- Where a record is found to be inaccurate, a correction will be made as soon as practical. There is no charge for making a request to correct personal information.

8. Records

8.1 **Creation of Records**

(1) Records, once created, received or as soon as possible, are to be added to the record-keeping system. Records are to be kept or stored in a digital format unless it is deemed impractical to do so.

(2) All records are named according to Section 9 the SPI's *Document and Records Version Control*.

(3) Standard 7.3.1 of the Higher Educations Standards Framework (Threshold Standards) 2021 stipulates that higher education providers must provide and update the following information for public access:

a) The registered and/or trading name of the provider.
b) The provider's regulatory status and authority to provide higher education courses to international students on an Australian student visa.
c) The instrument/s under which the provider was established.
d) A list of the members on the provider's governing body and senior executive/s.
e) The provider's Financial Standing.
f) Indicative total student enrolments.
g) A high-level organisational chart that outlines the units or groups which are responsible for the provision of education (e.g. schools, faculties, departments).
h) Campus location and contact details.
i) A summary of the provided facilities, campuses, learning resources and support services for students.
j) A list of the courses available and estimated number of annual enrolments.
k) If relevant, arrangements with external parties to facilitate the delivery of courses and/or research training.
l) The three most recent annual reports if public annual reports are required.

(4) Standard 7.3.2 of the Higher Educations Standards Framework (Threshold Standards) 2021 stipulates that higher education providers must provide and update the following information for public access when listing courses of study:

a) The accreditation status of each course of study.
b) The qualification/s offered.
c) Whether the qualification is recognised by the Australian Qualifications Framework.
d) If the explicit recognition for each course of study by a relevant professional body for the registration of graduates to practise the said profession, confirmation of recognition is required.
e) Whether each course of study is authorised to be offered to international students studying on an Australian student visa, and the duration of each course of study.
f) How to lodge a complaint about the higher education provider, and contact details of internal and external support.

(5) The SPI CEO is responsible for the oversight and approval of the updating, publication and/or removal of information on the SPI Website to ensure that all information contained in Sections 8.1 (3) and 8.1 (4) of this document is publicly available, accessible, accurate and relevant. The CEO is also responsible for reviewing the repository (RPAI) within 7 working days of a decision to change information to ensure the repository is updated to reflect any change to the status of information.

8.2 **Records Maintenance**

(1) Records marked for retention must be stored in a proper manner.
(2) Records must be accessible by authorised individuals.
(3) Records must be properly maintained regardless of format unless marked for destruction.

8.3 **Retention and Disposal of Records**

(1) Unless directed otherwise by an authorised staff member, records are to be stored and disposed of according to their respective disposal schedules.

a. In some cases, certain records or groups of records may be retained past the minimum retention period. Extensions will be detailed in the appropriate policies and procedures.

b. Unauthorised or improper disposal of SPI records constitutes a violation of SPI policies and procedures.

(2) The disposal date must be calculated and determined in relation to the identified disposal trigger.

(3) The CEO must give permission prior to the destruction of any records.

a. A register of destroyed records must be maintained and updated whenever a record is destroyed.

(4) All reasonable efforts must be made to ensure that the destruction process is proper and secure to protect confidentiality.

8.4 **Archiving Records**

(1) Records that are inactive are to be archived following the approval of the CEO or a SPI staff member delegate of the CEO.

(2) Records that are to be kept indefinitely or inactive records with unexpired retention periods will be kept in the archive.

8.5 **Records Security**

(1) All records, unless excepted by active SPI policies and procedures, must be continuously maintained, secured and kept confidential to:

a) Ensure the accurate nature of the records, particularly those regarding enrolments, academic or course progression, course or unit completions, and awarding of qualifications;

b) Protect confidential or restricted information and records, such as personal information, from unauthorised access and to prevent the violation of academic integrity;

c) Document responses to and violations of academic or research integrity, breach of policies, allegations of and real misconduct, complaints or grievances and critical incidents.

(2) To prevent or minimise the risk of records loss, SPI shall implement this policy in conjunction with a *Critical Incident Management Policy and Procedure*.

(3) All reasonable efforts must be made to prevent damage or unauthorised and falsifying modifications of records. Records must be kept in a secure environment with access restricted by a user password hierarchy.

8.6 **Specific procedures for the handling of records may be prepared for each records section.**

(1) All section procedures must refer to and comply with this policy.

(2) Section procedures may only be created, implemented or removed following the approval of the CEO.

9. Documents and Records Version Control

Documents or records must be captured in an approved record-keeping system as soon as practicable to ensure a full and accurate record is stored and managed. Staff are responsible for ensuring records or documents created or received via personal devices or programs are captured in the SPI recordkeeping system.

9.1 **Hard copy documents or records**

Hard copies (not being computer-produced) if they require amendment, will be amended by replacing the old (whole or part) document with the new one with the new date in the footer. If the document is only paper and not electronic, old copies are to be placed in an archive box file in secure storage.

9.2 **Electronic documents or records**

Controlled documents are kept electronically and generally accessible within the permission restrictions of SPI staff members or official sources. All documents or records must remain in the appropriate computer folder or sub-folders as appropriate.

9.3 **Version Control**

All documents and records shall be labelled as per the following Version Control table

Version Number	Purpose
0.1, 0.2, 0.3 …	Draft versions
1.0	The first final/approved version – the document normally has been issued for consultation.
1.1, 1.2, 1.3 …	Subsequent revisions following the first issued version, all amendments will be documented.
2.0	Subsequent Finals that indicate the second major approved version.
…	

With regard to the version control, the latest version number will be reflected through the file name, the current status and the amendment history within the document.

9.4 **Naming Convention**

(6) All documents and records shall be named consistently as follows:

- **Draft Version**
  - Title
  - Drafted Version Number

- **Final Draft Version (Prior to Review or Consultation)**
  - Title
  - Version Number
    - Final Version Number or;
    - Revised Version Number

- **Approved Version**
  - Title
  - Version Number
    - Approved Version Number

10. Publication of Information

10.1 The CEO or delegated authority is responsible for the publication of accurate, relevant and timely information for students, ensuring students (including students with special needs) have access to the relevant information to enable informed decision making, in compliance with Standard 7.2.1 of the Higher Educations Standards Framework (Threshold Standards) 2021.

10.2 Where advertising, promotional, marketing or recruitment materials are published, including on the SPI Website, the CEO is responsible for executing the lifespan of such material. This includes removal, updating or publishing materials at specified times. All the updates shall be published on the SPI website within 7 working days of the date on which the decision to change content was

made. This will ensure that all relevant information is made public, accessible, accurate and relevant.

10.3 The CEO or delegated authority in consultation with the relevant Section Managers must conduct reviews no later than 14 working days prior to the beginning of each trimester to the information below, and ensure that the SPI website and any other document repositories are updated.

(1) Information regarding courses
(2) Information to assist students in planning for and participating in educational and other activities at SPI
(3) Information regarding the student's responsibilities, expectations and obligations to SPI
(4) Information regarding academic governance policies and requirements
(5) Information to facilitate access to services and support
(6) Information regarding grievances and complaints processes
(7) Information to assist International Students

11. Disposal Authority Schedule

The table below sets out the disposal schedule for the most commonly used records. Consult the relevant Sections Manager and/or CEO if you are unsure or a relevant record is missing.

Reference	***Function / Activity***	***Disposal Action***
1.0.0	**Governance and General Administration**	
1.1.0	Institutional establishment.	Permanent Retention.
1.2.0	Restructuring: The establishment of new organisational structures.	Permanent Retention.
1.3.1	Accreditation: Final submission and official approval.	Permanent Retention.
1.3.2	Accreditation: Drafts, research, analysis.	Retain for 3 years after action completed, then destroy.
1.4.1	Planning: Final approved version.	Retain for 7 years after planning is superseded, then destroy.
1.4.2	Planning: Drafts, research, analysis.	Retain for 3 years after action completed, then destroy.
1.5.1	Policy: Final approved version.	Retain for 7 years after the policy is superseded, then destroy.
1.5.2	Policy: Drafts, research, analysis.	Retain for 3 years after action completed, then destroy.
1.6.1	Procedure: Final approved version.	Retain for 5 years after the procedure is superseded, then destroy.
1.6.2	Procedure: Drafts, research, analysis.	Retain for 3 years after action completed, then destroy.
1.7.1	Agreements: Establishment, negotiation, maintenance and review of agreements.	Retain for 7 years after expiry or termination of the agreement or after-action completed, whichever is later, then destroy.
1.8.1	Reports submitted to external organisations, e.g. Tertiary Education Quality Standards Agency (TEQSA)	Retain for 10 years after action completed, then destroy.

2.0.0	**Collections**	
2.1.1	Records relating to access and use of collections owned or loaned to SPI.	Retain for 6 months after action completed, and then destroy.
2.2.1	Records of borrowings and use of library materials.	Retain until no longer required for administrative purposes, and then destroy.
2.3.1	Records relating to the purchase or acquisition of items or materials to be held at SPI.	Permanent Retention.
2.4.1	Disposal of items or materials.	Permanent Retention.
2.5.1	Records relating to the maintenance and storage of items in collection.	Retain for 5 years after disposal of item, then destroy.
3.0.0	**Equipment and Stores**	
3.1.1	Acquisition: Quote, negotiation, correspondence.	Retain for 7 years after action completed, and then destroy.
3.2.1	Insurance: Policy, renewals, information.	Retain for 7 years after expiry of the policy, and then destroy.
3.3.1	Stock-take.	Retain for 2 years after action completed, and then destroy.
4.0.0	**Technology and Telecommunications**	
4.1.1	Acquisition: Quote, negotiation, correspondence.	Retain for 7 years after the system is superseded, then destroy.
5.0.0	**Occupational Health and Safety**	
5.1.1	Accidents: Records relating to incidents that result in serious personal injury or incapacity to employees and remedial actions are taken.	Retain for 75 years after action completed, then destroy.
5.1.2	Accidents: Records relating to incidents that DO NOT result in serious personal injury or incapacity to employees and remedial actions are taken.	Retain for 5 years after action completed, then destroy.
5.2.1	Critical Incidents: Records relating to the incident and student outcome.	Retain for 5 years after the student completes and then destroy.
5.3.1	Audits: The organisation's occupational health and safety management systems or processes.	Retain for 6 years after action completed, then destroy.
6.0.0	**Marketing**	
6.1.1	Production of Publications Final approved versions.	Permanent Retention.
6.1.2	Production of Publications: Drafts, research, graphic designs.	Retained until ceases to be of administrative or reference use, then destroy.
6.2.1	Organisation's website: Pages relating to the organisation's core business, and records of substantial changes made.	Permanent Retention.
6.3.1	Market Analysis: Including market research, forecasting, advertising, promotion, pricing	Retain for 2 years after action completed, then destroy.
6.4.1	Student Recruitment to encourage prospective students to apply including overseas marketing activities.	Retain for 2 years after action completed, then destroy.
7.0.0	**Financial Management**	

7.1.1	Account management.	Retain for a minimum of 6 years after the audit.
7.2.1	Employee taxation records.	Retain for 5 years after separation/termination of employment, whichever is the longer, then destroy.
8.0.0	**Human Resources Management**	
8.1.1	Recruitment Selection process.	Retain for 2 years after recruitment has been finalised, then destroy.
8.2.1	Contracts: Employment, promotion, work/position redesign, separation.	Retain for a minimum of 7 years.
8.3.1	Staff Leave: Administration of leave, leave requests, long term entitlements	Retain for a minimum of 7 years.
8.4.1	Performance Management: Administration, implementation, individual performance agreements.	Retain for 7 years after employment ceases, then destroy.
8.5.1	Grievances: formal grievances raised by an employee.	Retain for 10 years after action completed, then destroy.
8.6.1	Records relating to the provision of awards to staff (eg. performance awards).	Retain for 5 years after reward no longer offered.
8.7.1	Staff Exchanges.	Retain for 2 years after the arrangement expires.
9.0.0	**Student Administration**	
9.1.1	Application Records relating to offers and applications which are successful and accepted.	Retain for 6 years after completion or discontinuation of course or program of study by the student, then destroy.
9.1.2	Unsuccessful applicants.	Retain until the appeal period has expired or for 6 months after action completed, whichever is longer, then destroy.
9.2.1	Records relating to Student Offer Letter and Acceptance of Offer, Student Enrolments, as well as the receipts of payment made by students under the accepted Student Offer.	Retain for 6 years after completion or discontinuation of course or program of study by the student, then destroy.
9.3.1	Withdrawal – from a course of study, including the records of requests from international students to transfer out of SPI that clearly state the assessment and decision with the reasons.	Retain for 6 years after completion or discontinuation of course or program of study by the student, then destroy.
9.4.1	Student Fees.	Retain for 7 years after completion or discontinuation of course or program of study by the student, then destroy.
9.5.1	Student penalties and fines.	Retain for 1 year after action completed, then destroy.
9.6.1	Student deferment of the commencement of the study, or suspension of study (including the record of any decisions with reasons); or exemption forms and application.	Retain for 6 years after completion or discontinuation of course or program of study by the student, then destroy.
9.7.1	Student attendance and related documents e.g. medical certificates.	Retain until program completion or until point of discontinuation if course abandoned.

9.8.1	Grievances Records relating to formal grievances raised by a student.	Retain for a minimum of 15 years after action completed, then destroy.
9.9.1	Graduation Notification: Notification of students of their eligibility to graduate.	Retain for 1 year after action completed, then destroy.
9.9.2	Register of Graduates and certification documentation.	Permanent Retention
9.10.1	Student ID card: Records relating to the provision of student identification.	Retain until no longer required for reference or administrative purposes, then destroy.
9.11.1	Variation of student details Address and contact details.	Retain until no longer required for reference or administrative purposes, then destroy.
9.11.2	Variation of student details Notification of student name change.	Retain for 6 years after completion or discontinuation of course or program of study by the student, then destroy.
9.12.1	Student Orientation: planning and management of student orientation.	Retain for 2 years after action completed, then destroy.
9.12.1	Unit of Study Survey, Course Completion Survey and Facilities and Student Services Survey.	Retain for a minimum of 7 years or two registration periods whichever is the greater.
9.13.0	Records relating to misconduct, including academic misconduct or breaches of SPI policy.	Retain for a minimum of 15 years after action completed, then destroy.
10.0.0	**Courses**	
10.1.1	Course delivery materials e.g. subject outlines, study guides, readings, reading lists, assignment lists, lecture notes.	Retain for 5 years after no longer required for teaching.
10.2.1	Course guides: course descriptions, requirements, prerequisites, content and outcomes.	Permanent Retention.
10.3.1	Quality assurance: Records relating to the assessment of data/feedback on course delivery.	Retain until no longer required for reference or administrative purposes, then destroy.
10.4.1	Curriculum Approved Curricula, including the Work Integrated Learning (WIL) activities.	Permanent Retention
10.4.2	Curriculum: Records of the approval process.	Retain for 10 years after Curricula superseded, then destroy.
10.4.3	Curriculum: Curriculum development / Working papers.	Retain for 3 years after curricula superseded, then destroy.
10.5.1	Administrative arrangements for the conduct of examinations and other assessment activities.	Retain until no longer required for reference purposes, then destroy.
10.5.2	Examination papers – Master set of questions.	Permanent Retention
12.0.0	**Academic Results**	
12.1.1	Student academic transcript/final results.	Permanent Retention.
12.2.1	Grading/marking of individual assessment components, e.g. assignments, essays, theses.	Retain until course completion or until point of discontinuation if course abandoned.
12.3.1	Special consideration requests.	Retain for 7 years after completion or discontinuation of course or program of study by the student, then destroy.
13.0.0	**Research**	
13.1.0	Records of funded research projects.	Permanent Retention.

13.2.0	Research data.	Retain for 5 years after action completed.
13.3.0	Intellectual property administration.	Retain for 5 years after action completed.

Notes

Related legislations

Privacy and Personal Information Protection Act 1998 No 133
Health Records and Information Privacy Act 2002 No 71
State Records Regulation 2015

Related Documents:

SPI Staff and Affiliates Code of Conduct
SPI Conflict of Interest Policy

Amendment History:

Version No.	Approved by	Effective date	Amendments
1.0	Governing Council	27/08/2021	New Policy
1.1	Governing Council	29/01/2022	Section 10 inserted, amendments made to Sections 4.5, 8.1 and 11.
1.2	Governing Council	23/09/2022	Amendments made to Section 11