

Records Management Policy

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1. PURPOSE

This policy outlines the principles and approaches associated with the Barton Business School's ("BBS") commitment to effective, efficient, and compliant records management practices. It specifies the framework, ensuring that authorised, complete, and accurate records of all BBS activities and decisions are created, managed, retained, secured, stored and disposed of appropriately under relevant legislation.

2. SCOPE

This policy applies to all records created as a result of BBS's activities including business transactions and use of business applications such as email clients, database applications, and website software. It applies to all records in any format created or received by BBS to support its business activities, transactions, and decisions.

3. DEFINITIONS

Refer to BBS's *Glossary of Terms*.

4. POLICY

- a. BBS is committed to creating, retaining, securing, continually improving, and appropriately disposing of all records and decisions that completely and accurately reflect its business activities.
- b. All areas of BBS operations must keep records following this policy on matters such as learning and teaching, engagement, administrative operations, and commercial activities.
- c. Following this policy, all staff are responsible for creating, retaining, securing, continually improving, and appropriately disposing of all records.
- d. All staff are responsible for protecting personal and confidential information when accessing records.
- e. All staff are responsible for completing record-keeping induction and training modules that are relevant to their function.
- f. BBS will follow sound procedures for the security, privacy, confidentiality, backup, and disposition of all records.
- g. BBS will implement, maintain, and operate systems that seek to protect the authenticity of records.
- h. BBS will follow sound procedures for storing all records, including those in electronic format. This includes identifying high-risk and high-value records as well as developing and implementing appropriate disaster preparedness plans and backup and recovery procedures.

5. PROCEDURE

5.1. RECORDS CREATION

- a. Irrespective of format, authentic, accurate, and complete records of all BBS activities and decisions will be captured systematically by authorised staff or systems.
- b. Relevant records will be indexed after being created as close as possible to the commencement of business activity. This will ensure a complete and accurate record is captured and maintained within the records management system as soon as practical.
- c. Record capture may include but is not limited to emails, documents generated electronically, and verbal decisions and advice.
- d. All records collected or created by staff for BBS's activities and operations are owned by BBS unless otherwise specified under the contract.
- e. If possible, physical records will be digitalised and stored in accordance with this policy.

5.2. RECORDS MANAGEMENT

- a. To ensure that the integrity of all records is not jeopardised, they must be secured against unauthorised access and use.
- b. A secure computer network will be operated and maintained at BBS that identifies and authenticates users. The system will permit users to take only those actions allowed under the action privileges assigned to them.
- c. For digitised records, BBS will have in place and operational a backup and recovery system.
- d. High-value physical records must be protected in secure, fire-resistant facilities.

5.3. RECORDS STORAGE AND ACCESS

- a. Physical records will be stored in a secure area. Access will be available only to authorised staff.
- b. If records are stored with an individual employee, at all times they must be made available to authorised users.
- c. Current records will be stored with the department that is responsible for the records.
- d. Non-current records will be indexed in the records management system and destroyed or stored as archives in a suitable location.
- e. No physical records will be stored outside BBS-controlled premises without the approval of the Board of Directors.
- f. In the ordinary course of their duties, staff will have access to relevant records.
- g. Staff should only access and use the records they need to need to carry out their duties.
- h. If staff members must disclose records, they must give them only to authorised third parties..
- i. Personal information about staff and students of BBS will be secured confidentially within all levels of BBS's records.

- j. BBS has obligations under privacy legislation to safeguard all confidential information. BBS will ensure that anyone acting on its behalf maintains appropriate confidentiality of personal records. Personal records will be held in a secure environment and safeguarded against loss, damage, or unauthorised access.
- k. Only authorised individuals will be allowed access to student and staff records.

5.4. RECORDS RETENTION

- a. The following student records must be kept for a minimum of two (2) years after the student ceases to be a BBS student:
 - i. Enrolment documents including all evidence submitted by the student.
 - ii. Written agreement between the student and BBS.
 - iii. Academic records of a student relating to assessments.
 - iv. Records of all applications, including all evidence submitted by a student and the written advice issued to the student about the decision made on requests for credit transfer and/or RPL made under *Credit and Recognition of Prior Learning Policy and Procedure*.
 - v. Records of all requests, including all evidence submitted by a student and the written advice issued to the student about the decision made on deferment of commencement of study, made under the *International Student Deferment, Suspension and Cancellation of Study Policy and Procedure*.
 - vi. Records of all requests, including all evidence submitted by an international student and the written advice issued to the student about the decision for a release to transfer to another registered provider, made under the *Student Transfer Between Registered CRICOS Providers Policy and Procedure*.
- b. The following records of all students must be kept for a minimum of five (5) years after the student ceases to be a BBS student:
 - i. Records of all student complaints and appeals made in accordance with the *Student Complaints and Appeals Policy and Procedure*.
 - ii. Records of proven misconduct by a student.
- c. The following records must be kept indefinitely:
 - i. Student results for units they have taken.
 - ii. Student results for courses they have taken.
 - iii. Student graduation information.
- d. In compliance with section 286 of the Corporations Act 2001, all financial records are to be kept for at least seven (7) years after the transactions covered by the records are complete.
- e. In compliance with the Australian Taxation Office (ATO) requirements, BBS will keep most [business records for at least 5 years](#), in plain English, and in a way the ATO can access them.
- f. In compliance with the Australian Taxation Office (ATO) requirements, BBS will [keep some records for longer than five years](#), including covering the period of review for an assessment that uses information from that record.

5.5. RECORDS DISPOSAL AND DESTRUCTION

- a. Records will be disposed of in compliance with the [Australian Privacy Principles Guidelines](#) for information held by an organisation.
- b. When personal information is no longer required for any legitimate and sanctioned purpose, BBS will take reasonable steps to destroy or de-identify the information, together with any copies of the information, including archived records and backups.
- c. All records will be disposed of by secure means, such as shredding documents that contain personal or financial information.
- d. The CEO must approve the destruction all expired records (hard copy or electronic).

6. ROLES AND RESPONSIBILITIES

- a. All staff, including casual staff, contractors, and individuals who perform work on behalf of BBS, must understand and comply with the record-keeping requirements outlined in this policy.
- b. All staff, including casual staff, contractors, and individuals who perform work on behalf of BBS, are responsible for ensuring that they access and use only records and information that are relevant to their role.
- c. All permanent and casual staff are responsible for developing, implementing, and monitoring the records and information management, including the training and awareness program that provides staff with the necessary knowledge and skills to fulfil their record-keeping obligations.
- d. BBS's CEO is responsible for ensuring that all staff comply with this policy.
- e. Supervisors and managers will monitor and support staff to ensure they understand and comply with this policy.
- f. Supervisors and managers will encourage and support positive record-keeping practices within their operation areas.

7. BREACHES AND COMPLAINTS

- a. If a student believes that a Privacy Principle has been breached, they may complain following the *Student Complaints and Appeals Policy and Procedure*.
- b. If a staff member believes that BBS has breached a Privacy Principle, they may complain following the *Staff Complaints and Appeals Policy and Procedure*.

8. VERSION CONTROL

Document title	Records Management Policy	
Approved By	Board of Directors	
Date of Review	This document is to be reviewed every two years at a minimum from the date of final approval	
Related Documents	<ul style="list-style-type: none"> • Academic Freedom and Freedom of Speech Policy • Academic Progression and Student At Risk Policy and Procedures • Admission Policy and Procedures • Assessment Policy and Procedures • Critical Incident Policy and Procedures • Marketing and Student Recruitment Policy • Privacy Policy • Risk Management Policy Frameworks with Risk Register • Staff Code of Conduct • Staff Complaints and Appeals Policy and Procedures • Staff Recruitment and Selection Policy • Student Code of Conduct • Student Complaints and Appeals Policy and Procedures • Terms of Reference - Board of Directors 	
Related Legislation and References	<ul style="list-style-type: none"> • Electronic Transactions (Victoria) Amendment Act 2011 • Evidence Act 2008 • Freedom of Information Act 1982 • Higher Education Standards Framework – (Threshold Standards) 2021 • Manage Online records – Digital Guide • Privacy and Data Protection Act 2014 • Retention and Disposal Authorities (RDA's) for Records of Common Administrative functions • Tertiary Education Quality and Standards Agency (TEQSA) Act 2011 • Higher Education Support Act 2003 • Higher Education Provider Guidelines 2023 	
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