

## CHS Records Management Policy

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## 1. Purpose

This policy outlines the CHS's approach to the collection, use and management and destruction of records at CHS.

## 2. Scope

All students and employees who use or access CHS's records and or Records Management System are bound by terms of this policy.

## 3. Definitions

Item	Definition
<i>CHS records</i>	Any records made and kept, or received and kept, by any person in the course of the exercise of official functions, or for any purpose of CHS or for the use of the CHS including records in any format such as paper, electronic (email, spreadsheets, word documents, images etc.), audio or video cassettes, film, photographs, publications and microfilm/fiche).
<i>CHS representative</i>	A CHS employee (casual, fixed term or permanent), contractor, agent, appointee, adjunct, visiting academic and any other person engaged by CHS to undertake some activity for on behalf of CHS. This includes corporations and other bodies falling into one or more of these categories.
<i>Archives</i>	Records that have been selected for indefinite retention on the basis of their continuing value for legal, administrative, financial or historical purposes, but are no longer required for current use.
<i>Business activities</i>	Refers to any action that contributes towards CHS's decision-making process or service delivery, including all CHS functions, processes, activities and transactions.
<i>Business systems</i>	Automated systems that create or manage data about CHS's activities.
<i>Full and accurate record</i>	A record that: <ul style="list-style-type: none"><li>• correctly reflects what was done, communicated or decided, and can be trusted as a true representation of the transactions or events which it documents;</li><li>• is authentic, for example the record can be proven to be what it claims to be, to have been created or sent by the person claimed to have created or sent it, and to have been created or sent at the time claimed;</li><li>• has integrity by virtue of being complete and protected against unauthorised access, alteration, deletion or loss; and</li><li>• is usable by virtue of being understandable, complete, retrievable and available through time.</li></ul>
<i>Managing records</i>	Any action relating to the life cycle of a record, including the storage, assignment of metadata, retrieval, transfer, preservation, and eventual disposal of records.
<i>Meta data</i>	A set of data that describes and gives information about other data

<b>Item</b>	<b>Definition</b>
<b>Record keeping</b>	The making and maintaining of complete, accurate, and reliable evidence of business transactions.
<i>Records</i>	A part of and resulting from College activities and providing evidence of those activities. Any document or other source of information compiled, recorded or stored in written form or on film, or by electronic process, or in any other manner or by any other means. Records may include, but are not limited to, any student or staff member's paper based records, emails, or electronic documents stored at CHS or on CHS equipment. A record does not include personal and/or private documents that are not part of official College records.
<i>Records disposal</i>	Any method of removing records from CHS's control, such as archiving or destruction.
<i>Records management program</i>	The management framework, the people and the recordkeeping systems required to manage full and accurate records over time.
<i>Records management system (RMS)</i>	Comprises the: <ul style="list-style-type: none"> <li>• Student Management System – Meshed HEd</li> <li>• Document Management System – SharePoint</li> <li>• Finance Records - XERO</li> <li>• HR Records - ADP</li> <li>• Marketing Records – SharePoint</li> <li>• Learning Content Management System</li> </ul>
<i>Vital records</i>	Records that are essential for the ongoing business of CHS, and without which the CHS could not continue to function effectively.

#### 4. Policy Statement

This policy is in accordance with Higher Educations Standards Framework Standard 7.3.3 which stipulates that 'information systems and records are maintained, securely and confidentially as necessary to:

- a. maintain accurate and up-to-date records of enrolments, progression, completions and award of qualifications
- b. prevent unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic or research integrity
- c. document and record responses to formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents, and
- d. demonstrate compliance with the Higher Education Standards Framework.'

This policy provides the basis for the management of CHS's records in compliance with State and Commonwealth Acts and the legislative instruments issued under each Act.

This is achieved via a CHS-wide records management program to manage records throughout their lifecycle - from the design of record keeping systems, to the creation and capture of records, to records destruction or permanent retention as Archives.

This policy ensures that CHS's records that are of enduring evidential or informational value are managed, protected and preserved for future reference, contributing towards the development of efficient and effective knowledge management at CHS.

## 5. Records Management Principles

The full life cycle of records management at CHS is based upon the principles for effective records management. These are:

- CHS records must be timely and routinely created and captured, be readily locatable, and be authentic.
- CHS records will be managed to ensure they are reliable and easily identifiable, are protected and accessible only to those with authorisation, and are retained appropriately to ensure they are retrievable.
- CHS records will only be disposed of once authorised, and that disposal will be timely and recorded.

## 6. CHS Records

CHS records can be in any format, and include, but are not limited to, the following:

- Legal documents including contracts, agreements, memoranda etc.;
- Student records including those records stored on RTO Manager, OLS, physical student files, exams, academic records, and advanced standing records.
- Records of decisions made and actions taken by CHS representatives in relation to CHS related matters that are documented in email messages, memoranda, letters, faxes, etc.;
- Incoming communications from external persons and bodies;
- Outward communications to external persons and bodies;
- Meeting papers of formally established CHS boards and committees (including agendas, agenda papers, minutes, reports and decision pages);
- Meeting papers of ad-hoc committees and working parties (including agendas, agenda papers, minutes, reports and decision pages);
- Financial transactions held electronically or in hard copy format;
- Personnel transactions (i.e. letters of appointment, reports on performance and other dealings between staff and CHS);
- Course and unit outlines issued to students and the public; and
- Approved course and unit proposals and course accreditation documentation.

### 6.1 Approach to management of records

CHS is committed to implementing best practice approaches to its management of records:

- Meeting the requirements of Commonwealth, state and/or territory legislation, the registering body and relevant funding bodies when collecting information from and about students.
- Keeping records in a consistent and easily accessible format.
- Ensuring that records are routinely checked for accuracy and currency.
- Keeping all information secure and protected.
- Routinely backs up all electronic records.
- Archiving records appropriately and in accordance with established practices.

Effective management of records is achieved through:

- Maintenance of an electronic file server where all internally produced documents are stored. Electronic files are archived and not deleted when they become obsolete.
- Use of an electronic student management system which records and stores all information relating to students, course progress and assessment outcomes.

- Use of an electronic financial management system where all financial activities of the business are stored.
- Documented policies and procedures with which all staff are familiar with and adhere to.
- Policies and procedures that outline the organisation's requirements on consistency, accuracy and integrity in relation to data and records management.

## 6.2 Student records management system

The student management system used by CHS is RTO Manager. This system meets the Australian Education and Training Management Information Statistical Standard and enables provision of compliant data to the registering body on a regular basis.

CHS has ensured that the database system meets the following requirements:

- The database allows student records to be provided in electronic format and or in printed format when desired.
- All information is kept secure, safe and confidential.

## 6.3 Security of records

Records are routinely backed up. Hard copy documents are scanned and a copy stored electronically in secure folders the SharePoint. All records are kept private, protected and secure, whether electronic or in hard copy.

## 6.4 Types of records

CHS shall keep comprehensive records of all business activities. Dedicated registers and physical records of the following business activities are consistently and routinely maintained by the organisation:

- continuous improvement.
- staff professional development.
- complaints and appeals.
- partnerships with other organisations.
- workplace health and safety incidents.
- marketing activities and permissions.

Student records include information on:

- Personal details.
- Employment information where applicable.
- Enrolment and general communication.
- Student fees and payments.
- Assessment results, training participation records and course progress.
- Statistical information.
- Qualifications and issuance of statements.

Staff records include, certified, verified and/or signed copies of:

- Resume/ curriculum vitae.
- Written offer and acceptance.
- Appointment details.
- Position description and employment agreement.
- Qualifications and experience.

- Working with children checks (where applicable)
- Payroll and personal details.
- Performance monitoring and management records.
- Professional development plans and logs.

Other business records include:

- Feedback collected from students, employers, staff and other organisations on the training, assessment and client services provided by the organisation.
- Training and assessment strategies for each program.
- Business communication.
- Funding contracts.
- Financial documents.
- Supplier information.

## 6.5 Format of records

Physical paper-based records are stored in folders that are kept securely, labelled accurately and consistently maintained.

CHS aims to be a paperless operation and as many records as possible are scanned and converted to an electronic format and stored on the organisation's electronic file server, student management system and/or financial management system. Checks on the accuracy and integrity of information are conducted routinely by staff as part of their normal day-to-day operations.

## 6.6 Record retention

- CHS retains student assessments from the date of the assessment and post that period, and maintains evidence that is sufficient to confirm eligibility for the award or otherwise agreement for at least two years after the person ceases to be an accepted student.
- CHS retains student records of completed units of study and qualifications for a period of no less than thirty (30) years.
- Physical financial records are stored for a period of at least seven (7) years for tax auditing purposes.
- Physical student files containing all information relating to enrolment and administration are kept in secure locations ensuring that CHS complies with the regulatory requirements for record retention.

## 6.7 Access to records

All students and clients have the right to access the records CHS holds about them. Records will be provided in a timely manner upon written request and always when requested by the regulator (TESQA) and/or their representatives. The authority to release student data to the regulatory bodies and Governments is part of the Agreement that the College signs with each student.

Each area of the College must:

- Comply with all CHS rules, policies, procedures, and guidelines on records management;
- Ensure full and accurate records are made and kept of all activities carried out by their unit;
- Ensure recordkeeping responsibilities are identified in all position descriptions;
- Manage the records of the unit;
- Create and maintain appropriate files;
- Determine appropriate retention periods and access restrictions in consultation with the Legal Counsel, where appropriate;
- Identify vital records; and
- Maintain security for hardcopy records stored in the office.

All CHS Staff must:

- Create full and accurate records of all CHS activities for which they are responsible and of all substantive or formal decisions they take in the service of CHS;
- Attend Records Management System training as provided by CHS
- Capture all CHS Records into CHS's approved record keeping system;
- Protect sensitive records in their custody from unauthorised access;
- Not destroy records without authorisation from their line manager; and
- Not maintain individual or separate files or recordkeeping systems or unmanaged electronic records except as otherwise authorised by CHS.

Executive assistants, administrative staff, executives and/or Chairs of all Boards and committees, panels, working parties and project teams must:

- Manage all records;
- Comply with all CHS rules, policies, procedures and guidelines on records management in regard to the records of the committee, working party or project team;
- Create and keep full and accurate records of all committee, working party or project team meetings; and
- Register all business papers and minutes into the Document Management System.

## **7. Creation/Capture of Records**

All CHS staff are responsible for the creation and/or capture of CHS records within the approved recordkeeping system. The CHS recordkeeping system consists of:

- The approved records management system; and
- Approved business systems.

## **8. Version Control and Management of Files**

All CHS records, whether electronic or paper, must be registered in an approved record keeping system at the point of creation or receipt. CHS staff are not to maintain individual or separate files or recordkeeping systems or unmanaged electronic repositories (Hard Drives, Network Drives, Cloud Storage systems) for CHS Records except as otherwise authorised by the CEO or the Board of Directors.

## **9. Disposal of Records**

CHS will only dispose of records in accordance with the requirements of the State Records Acts for each State and their associated legislative instruments. The destruction of records registered in the approved Records Management System will be managed centrally through the Director of Quality and Accreditation, who shall maintain a register of such.

Records must not be destroyed if they are, or may be, the subject of a subpoena, or other formal request for access or relate to any ongoing action such as an appeal, regardless of whether the minimum statutory retention period has expired.

## **10. Responsibility**

The Director of Administration and Student Services is the top executive at CHS responsible for the implementation of this policy. Individual functional managers are directly responsible for management of the records pertaining to their operational areas and must inform the Director of Administration of

the processes and procedures in place for secure and systemic management of the records under their control. The Academic Registrar is responsible for management of all academic and student records, including collection, collation, correct formatting, secure storage of the related records and resolution of any issue that arises in relation to student records management.

## **11. Related Documents**

- CHS Student Academic Records Management Policy
- CHS Privacy Policy
- CHS Data Protection Policy

## **12. Relevant Legislations**

- State Records Act 1998 (NSW)
- Privacy Act 1988
- Privacy Regulations 2013
- Guidelines under Section 95 of the Privacy Act 1988 (2014)
- Evidence Act 1995
- Electronic Transactions Act 1999
- Fair Work Act 2009
- Fair Work Regulations 2009
- Privacy and Personal Information Protection Act 1998 (NSW)
- Health Records and Information Privacy Act 2002 (NSW)