CHSQF047 Data and Records Management Policy

1. Purpose

This policy provides the basis for the management of ECA College of Health Sciences (CHS or the "College") data and records in compliance with State and Commonwealth Acts and the legislative instruments issued under each Act.

The purpose of this policy is to provide a framework for the management of data and records at the College. This document refers to the secure capture, management, including provisions for access, and disposal of data and records, including the length of time they should be kept and how and when they should be destroyed and outlines responsibilities in relation to data and records management.

2. Scope

This Policy applies to all data and records created and maintained by the College and all staff, students and research affiliates involved in data and records management.

3. Definitions

Data	Information in any format collected and securely maintained by the College concerning the range of activities in which it is legitimately engaged as a provider of higher education and for which it is legally responsible and accountable.
Data and Records Management System (DRMS)	Comprises the: • Student Management System – Meshed Hed (includes students' invoice) • TechOne is in transition stage • Document Management System – SharePoint • Finance Records – TechOne • Students Fee Payment- Flywire • HR Records and Payroll Records– ADP, Employment Hero and SharePoint • Marketing Records – SharePoint • Learning Content Management System -Canvas • Student forms, Business Processes (workflow of how forms are accessed and their outcomes)- SharePoint • Student Database (includes students' enrolments, fees, learning support, progression, trimester break, official documents records) – works together with Meshed - SharePoint • Training data for Staff (SharePoint, Smartsheet) • Policies, Plans and Business Project Related Databases – Smartsheet • Research related database (SharePoint, Smartsheet) • Governance Records and Reports- SharePoint, Smartsheet and OneDrive

	• Data Analytics (Risk Indicators, Timetable predictions, Systems Audits, Appeals & Grievances) – SharePoint, Power BI • Timetabling, teaching staff scheduling (Smartsheet, Meshed Hed) • Professional development Academic/Non-Academic (Smartsheet) • Course variation requests, approvals - Academic (Smartsheet) • Course and subject management (Meshed Hed)
Records	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 the College or for the use of the College including records in any format such as paper, electronic (email, spreadsheets, word documents, images etc.), audio or video recordings, film, photographs, publications and microfilm/fiche).

4. Policy Statement

The College has a legal responsibility to protect the organisation's physical and electronic records and the information it holds 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:

- maintain accurate and up-to-date records of enrolments, progression, completions and award of qualifications
- prevent unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic or research integrity
- document and record responses to formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents, and
- demonstrate compliance with the HESF 2021

This policy ensures that the College'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 the College.

5. Types of Data and Records

The College maintains data and records in the following areas:

- students
- staff
- business, including finance
- academic and research content and data.

5.1 Student Data and Records
Student records include information on:
- Personal details including address and phone number
- Visa details
- Employment information where applicable
- Enrolment and general communication
- Student fees and payments
- Assessment results, training participation records and course progress
- Transcripts

- Statistical information from student progression/ attrition/ success rates/ completion data
- Qualifications and issuance of statements.

5.2 Staff Data and Records

Staff records include, certified, verified and/or signed copies of:
- Resume/ curriculum vitae
- Written offer and acceptance
- Appointment details and contract
- 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
- Scholarship and research data generated by activity conducted under the auspices of the College.

5.3 Business Data and Records

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.

5.4 Academic and Research Content and Data

Academic and Research Content and Data include
- Academic related contents but not limited Assessments, Unit Outlines, Lecture Slides and so on.,
- Research content and data generated in the course of assessments
- Research related content and data including the Thesis, Examiners Reports etc
- Supervisors' details.

6. Principles

The College is committed to implementing best practice approaches to its management of data and records by:

- 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 data and records in a consistent and easily accessible format.
- approving access only to those with authorisation
- ensuring that data and records are routinely checked for accuracy and currency.
- keeping all information secure and protected.
- routinely backing up all electronic data and records.
- archiving and disposing of data and records appropriately and in accordance with established practices and legislative requirements.

7. Access

Access to data and records is in accordance with the College Privacy Policy. Only the College staff who have legitimate reason within their role to access data and records may do so. All students, staff and clients have the right to access the records the College 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.

7.1 Student Data and Records

Disclosure of student information must be in accordance with the College's Privacy Policy. Current and former college students have access to their records on written request through the Registrar's Office. Information required by other education institutions to confirm qualifications of a current or former student of the College, such as confirmation of units of study completed, participation in officially recognised activities, and scholarships received by students, will not be released by the College unless accompanied by written authorisation of the student.

Requests for access to records via subpoena or legal warrant are directed to and managed by the Chief Executive Officer (CEO).

7.2 Staff Data and Records

Staff may access information on their files on request to the Registrar or the Human Resource.
Third party access to staff records is only permitted when required by law or with the approval of the CEO and the permission of the relevant staff member.

7.3 Research Data and Records

Research content and data generated under the auspices of the College by students and staff is the property of the College and must meet the requirements of Australian Code for the Responsible Conduct of Research and the Sovereignty & AIATSIS Code of Ethics for ATSI Research for research involving Aboriginal and Torres Strait Islander data. Research data may be shared with third parties for the purposes of dissemination subject to ethical, confidentiality and privacy requirements. Refer to *Research Data Management Policy* for more information.

7.4 Business Data and Records

The College business data and records are confidential but can be shared subject to reporting requirements to regulators and legal obligations.

8. Retention

8.1 Student Data and Records

The *Retention of Student Records Schedule* (see Attachment 1) provides information regarding the duration for retaining student records.

8.2 Staff Data and Records

Staff records are retained for 5 years after the staff member leaves the College.

8.3 Research Data

Research content and data owned by the College, may be retained for as long as the College considers it to be relevant, advantageous to its reputation or required in case of the need for referral to it. Where the research data has been produced by students for assessment purposes, it is retained for a minimum period of 5 years.

8.4 Business Data

Business data and records are retained for a minimum of 7 years.

9. Security and Storage

The College takes all reasonable care to ensure that all data and records are complete, accurate, and maintained securely. Processes and procedures are in place to protect the information in an electronic or hard copy format and maintain confidentiality.

Checks on the security of storage provisions are conducted routinely by staff responsible for data and records management.

9.1 Physical data and records

Physical records are kept in secure and locked cabinets in secure areas of the campus in order to be safeguarded against loss, damage or unauthorised access.

Hard copy documents if any are scanned and a copy stored electronically in secure folders in SharePoint.

9.2 Electronic data and records

Electronic data and records are securely stored through a Data and Records Management System (DRMS).

10. Disposal

The College disposes of data and 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 is managed centrally through the Registrar, who maintains a register of destroyed data and records.

In general, data and records may be destroyed on the completion of the retention periods specified at Section 8 of this policy.

Student data and records that are no longer required are destroyed securely in accordance with the Retention of Student Data and Records Schedule in Attachment 1.

Data and 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

11. Roles and Responsibilities

The CEO is responsible for the implementation of this policy and overall responsibility for the management and disposal of data and records at the College.

The Registrar is responsible for management and monitoring of all academic and student data and records, including collection, collation, correct formatting, secure storage of the related data and records and resolution of any issue that arises in relation to student data and records management.

The Human Resource is responsible for management and monitoring of all staff data and records, including collection, collation, correct formatting, secure storage of the related data and records and resolution of any issue that arises in relation to staff data and records. management.

The CEO is responsible for management and monitoring of all business data and records, including collection, collation, correct formatting, secure storage of the related data and records and resolution of any issue that arises in relation to business data and records. management.

The Academic Dean and Dean (Research) is responsible for management and monitoring of all academic and research content and data, including collection, collation, correct formatting, secure storage of the related data and records and resolution of any issue that arises in relation to student data and records management.

All staff members are responsible for the collection and accuracy of data and records associated with the activities for which they are responsible. Retention and disposal of data and records must only be done in accordance with the provisions of this policy.

12. Version Control

All the College data and records, whether electronic or hard copies, must be registered in the Data and Records Management System (DRMS) at the point of creation or receipt.

Policy Category	Corporate		
Document Owner	Company Secretary		
Responsible Officer	Registrar, Dean Academic, Dean (Research and Scholarship)		
Review Date	24 April 2027		
Version	**Change description**	**Approved**	**Effective Date**
1.0	New policy developed	Academic Board: 14 December 2018 Board of Directors: 18 December 2018	18 December 2018
1.1	Minor amendments		
1.2	Minor changes to the job title and extension of review date	CEO: 12 October 2023	12 October 2023
1.3	Extension of review date	CEO: 30 January 2025	30 January 2025
2.0	The policy has been harmonised by three IHEs. Benchmarking has been completed. Major changes were done with the policy updates including staff data, academic data and research data. Presented to the BOD on 24 April 2025.	Board of Directors 24 April 2025	24 April 2025

13. Related Documents
- Privacy Policy
- Admission Policy
- Awards of Grades Policy
- Award Issuance Policy
- Student Progression Policy
- Financial Planning and Financial Management Procedure
- ICT Disaster Recovery Plan
- Business Continuity Plan
- Academic Staff Professional Development Policy
- Scholarship and Research Plan
- Scholarship and Research Register
- Award of Credit Policy
- Research Data Management Policy

14. Relevant Legislation
- Tertiary Education Quality and Standards (TEQSA) Act 2011 (Cth);
- 'Education Services for Overseas Students Act 2000 (Cth);
- Education Services for Overseas Students Regulations 2001;

- The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (The National Code);
- The Higher Education Support Act 2003 (Cth);
- Public Governance, Performance and Accountability Act 2013
- 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)
- Australian Code for the Responsible Conduct of Research, 2018
- The Code of Practice - Responsible Conduct of Research

Attachment 1: Retention of Student Data and Records Schedule

DOCUMENTS AND INFORMATION RETAINED	Minimum Retention period(s)
Admissions, enrolment, and progression	
All records relating to the admission, enrolment, and subsequent progress of students. Includes show cause for progression purposes, special considerations affecting enrolment and progression, variations, of course, advanced standing, withdrawals, etc.	Retain a minimum of 7 years after completion or discontinuation of course or program of study by the student, then destroy.
Overseas students transfer requests	2 years after student ceases to be an accepted student.
Results and Graduation	
Records relating to the grading/marking of individual assessment components of a unit or course and determination of final results/grades. Includes: • examiners/assessor's reports and related records for higher degree students • appeals of grades • local faculty level informal requests for extension of assessment components for a subject • local special consideration arrangements	Retain a minimum of 1 year after the end of appeal period or minimum of 1 year after action completed, whichever is longer, then destroy.
Records confirming the award/receipt of a qualification Certification Documentation	Records containing information regarding student results for the Australian Qualifications Framework (AQF) will be retained for a minimum of 30 years from the student's course completion date.
Records of Student information, including: • name • current residential address • mobile phone number (if any) • email address (if any) • amount of money paid to the College • duration of the course paid for • amounts owing to the College • written agreements between the College and the student • up-to-date records of assessments	At least 2 years after the person ceases to be a student.
Grievances and Appeals and Misconduct	

All records in relation to student grievances, appeals, and misconduct, whether proven or unproven. Includes but is not limited to: • inquiries and investigations, outcomes, and matters referred to external bodies for investigation. • changes to assessment and final marks as a result of the grievance, appeal, or misconduct • handling complaints about perceived discrimination, the work/study environment, assessment/assignment organisation or distribution, peers, lecturers, tutors or supervisors, access to equipment, facilities (such as laboratories), tutorials, or other services • disciplinary processes for breaches of policy, rules, and other student disciplinary matters.	Retain a minimum of 7 years after action completed, then destroy.

Financial and Legal

FEE-HELP application documentation	Retain a minimum of 7 years.
Records required for legal action	Retained until the completion of that legal action.

Support services

Records relating to the provision of financial assistance services, special needs, and accessibility services (e.g., interpreters, reading assistance for sight-impaired students, disabled access, etc.,) and other tailored advisory or study support services and assistance to individual students, counselling services	Retain a minimum of 7 years after action completed, then destroy.
Records relating to the provision of library borrowing and usage rights (including the imposition of fines or other penalties).	Retain a minimum of 1 year after action completed, then destroy.

OVERSEAS STUDENT RECORDS

Details of accepted students, including: • name and gender • name, start date, and expected duration of the course • date of birth, country of birth, and nationality • details of the person who has the legal authority to act on the student's behalf (f the student is under 18 years of age) • course and location • agreed start date of the course • the day when the student is expected to complete their course	In accordance with this schedule, and also entered into PRISMS (within 14 days of the student being accepted into the course).

- amount of tuition and non-tuition fees received before confirming the student's enrolment - total tuition fees required to be paid to undertake the full course - whether the premium has been paid for the student's health insurance before the course commences - if the student has undertaken a test to determine their English competency, the name of the test, the course was taken, and the score - the location of the Australian government immigration office where the student's visa application was lodged - the student's passport number, and - if the student holds a visa, the visa number	