

## RECORDS MANAGEMENT POLICY

<b>Approving authority</b>	Governing Board
<b>Purpose</b>	This policy sets out the Institute's records management systems and processes.
<b>Responsible Officer</b>	President and CEO
<b>Next scheduled review</b>	February 2031
<b>Document Location</b>	<a href="https://www.ozford.edu.au/policies-and-procedures/higher-education/">https://www.ozford.edu.au/policies-and-procedures/higher-education/</a>
<b>Associated documents</b>	All Institute Policies and Procedures

### 1. PRINCIPLES

Ozford Institute of Higher Education (herein referred to as the "Institute") recognises that corporate records play a critical role in:

- supporting good business practices that aligns to the strategic direction;
- supporting service delivery, business continuity and good corporate governance;
- providing for evidence based and informed decision making;
- promoting accountability and transparency;
- supporting compliance with various legislative and regulatory provisions;
- capturing the corporate memory of the Institute; and
- providing evidence of what the Institute, its staff, students and stakeholders have (or have not) done, decisions made and any undertakings given.

The Institute is committed to establishing, maintaining and continually improving its records management practices, processes and culture, and strives to be compliant, effective and efficient.

The Institute's records management processes are based on four overarching records management principles:

- Records Management must be systematic and comprehensive.
- Records Management is everyone's responsibility.
- Records must be full and accurate and the systems that make, manage or keep them reliable and secure
- Records must be retained for as long as they are required and disposed of in a lawful, planned and approved manner.

### 2. SCOPE

This policy applies to all staff and contractors involved in the Institute's records management processes.

### 3. DEFINITIONS

#### ***Archives:***

Records relocated to long-term storage for preservation beyond their immediate business function, including permanent records.

#### ***Confirmation of Enrolment (CoE)***

The Confirmation of Enrolment (also called a CoE) is an official statement from the Institute via PRISMS that lists the student's details, course and the start and end dates of the course.

The Confirmation of Enrolment (COE) is an official document issued to international students by universities and other education providers in Australia. It confirms that the student has accepted a place in a course and has paid required tuition fees and Overseas Student Health Cover (OSHC). The COE is required by the Department of Home Affairs for the purpose of issuing a student visa.

#### ***Corporate Memory***

The accumulated body of data, information and knowledge created in the course of an organisation's existence.

#### ***Disposal:***

Destroy or abandon the record.

#### ***Evidence***

Information (captured or represented in a record or other record) that is used to prove a fact.

#### ***Records:***

Records is information in any form including data in computer systems, created or retrieved and maintained by the Institute and kept as evidence of activities.

#### ***Provider Registration and International Student Management System (PRISMS)***

Means the Provider Registration and International Students Management System (the electronic system that holds CRICOS and the electronic confirmation of enrolment).

### 4. POLICY

- 4.1 The Institute's records management is systematic and comprehensive with systems and records maintained, securely and confidentially. The Institute's systems are designed to prevent unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic integrity. All required information relating to students is stored appropriately with control over access with appropriate back-up arrangements in place.
- 4.2 The management of records at the Institute is an essential function and is the responsibility of all staff. The systematic capture of records in compliant systems ensures authentic, reliable and usable records are maintained as evidence of the Institute activities and transactions, allowing for better decision

making, transparency and accountability.

- 4.3 The Institute's records/files/documentation are categorised to ensure records are protected and can be accessed in a timely manner.
- All records need to be given clear and accurate titles. This is critical to make records clear, easily identifiable and enable efficient search and retrieval processes that need to be undertaken.
  - Records must be stored in suitable locations and protected from loss, damage or unauthorised access.
  - Records that are classified as internal, sensitive or confidential must not be provided to external parties unless appropriately authorised.
  - All physical records must be handled and stored with care to prevent deterioration, damage or loss.
- 4.4 The Institute will maintain accurate and up-to-date records of enrolments, progression, completions and award of qualifications. This will ensure that the Institute retains, archives and is in the position to retrieve sufficient information on client results to enable the re-issue of a qualification or statement of attainment if required.
- 4.5 The Institute's systems and records will document and record responses to formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents.
- 4.6 The Institute will comply with any regulatory or legislative requirements in relation to the management or retention of records to be able to demonstrate compliance with the Higher Education Standards Framework.
- 4.7 The Institute will comply with external reporting requirements as required.
- 4.8 Strategies for digital preservation and migration must be in place for long-term digital information. Records migrated to new information systems must be transferred in a manner that maintains the integrity, accuracy and context of the records and associated metadata. The migration must be clearly documented.
- 4.9 Where a service provider creates, captures, uses, stores, retains, and/or disposes of records with, or on behalf of, the Institute, including where service providers host an information system or provide software as a service or cloud storage, the relevant data and/or information system steward must ensure that:
- the Institute retains ownership of records and right of access to its records.
  - records are captured, stored and managed in line with this Policy.
  - relevant recordkeeping obligations equivalent to the requirements outlined in this Policy are imposed on the external party through an enforceable contract, and
  - the external party's compliance with recordkeeping obligations in the contract is monitored to ensure the obligations are being met.
- 4.10 Records must be retained for as long as they are required and must not be destroyed or disposed of without first undergoing a process of appraisal.

- Records will be retained in a usable and accessible form for at least the minimum retention period.
  - Any destruction process must be documented appropriately
- 4.11 Not creating records at all, creating incomplete or inaccurate records, falsification and unauthorised modification may result in legal liability and/or an individual breaching the ***Staff Code of Conduct Policy and Procedure*** and disciplinary action as set out in ***the Human Resources Policy and Procedure***.

## 5. QUALITY ASSURANCE

To ensure that this policy is fit for purpose and meet the requirements of the TEQSA Compliance Frameworks the policy will be;

- 5.1 internally endorsed by the Executive Management Team on development or review, prior to approval by Governing Board or other delegated authority;
- 5.2 externally reviewed as part of any independent review of the TEQSA Compliance Frameworks approved by the Governing Board;
- 5.3 internally reviewed by the Responsible Officer every five years from the date of approval (if not earlier).
- 5.4 referenced to the applicable TEQSA Compliance Frameworks requirement(s) and/or other legislation/regulation.

## 6. FEEDBACK

Feedback or comments on this policy is welcomed by the listed Responsible officer of the Institute.

## 7. ACKNOWLEDGEMENT

This policy was developed with reference to the following:

- Ozford College of Business, Records Management Policy, January 2016.
- Australian Catholic University, Record and Archive Management Policy, 2022 ([ANU Policy Library - Policy - Records and archives management](#))
- Federation University, Records Management Procedure, 2023 ([Records Management Procedure \(federation.edu.au\)](#))
- [Records Management Policy - Policy - JCU Australia](#)
- [Records Management Handbook.pdf \(adelaide.edu.au\)](#)
- [Records Management Policy \(unimelb.edu.au\)](#)
- [Records Management Policy | University of Technology Sydney \(uts.edu.au\)](#)

## 8. VERSION CONTROL

Version	Date approved	Description	Approved by
1.0	June 2014	Initial issue	GB
2.0	May 2017	Internal review	GB
3.0	September 2018	Internal review	GB
4.0	May 2019	Internal review	GB
5.0	October 2020	Internal review	GB
6.0	September 2023	Internal review	GB
6.1	February 2026	Review to remove under 18 student obligations after change in policy	EMT
Related legislation/ regulation/standard	<p><b>Commonwealth</b></p> <p>Tertiary Education Quality and Standards Act 2011 (Cth)</p> <p>Higher Education Standards Framework (Threshold Standards) 2021 (Cth)</p> <p>Education Services for Overseas Students Act (ESOS) 2000 (Cth)</p> <p>Education Services for Overseas Students Regulations 2019 (Cth)</p> <p>The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth)</p> <p>Higher Education Support Act 2003 (Cth)</p> <p>FEE-HELP Guidelines 2017 (Cth)</p> <p>Higher Education Provider Guidelines 2012 (Cth)</p> <p>Higher Education Support (HELP Tuition Protection Levy) Act 2020 (Cth)</p> <p>Higher Education (Up-front Payments Tuition Protection Levy) Act 2020 (Cth)</p> <p>Student Identifiers Act 2014 (Cth)</p> <p>Age Discrimination Act 2004 (Cth)</p> <p>Australian Consumer Law (Cth)</p> <p>Australian Human Rights Commission Act 1986 (Cth)</p> <p>Copyright Act 1968 (Cth)</p>		

<p>Crimes Act 1914 (Cth)</p> <p>Disability Discrimination Act 1992 (Cth)</p> <p>Disability Standards for Education 2005 (Cth)</p> <p>Fair Work Act 2009 (Cth)</p> <p>Fair Work Regulations 2009 (Cth)</p> <p>Privacy Act 1988 (Cth)</p> <p>Racial Discrimination Act 1975 (Cth)</p> <p>Sex Discrimination Act 1984 (Cth)</p> <p>Sexual Offence Crimes Act 1958 (Cth)</p> <p>SPAM Act 2003 (Cth)</p> <p>Workplace Gender Equality Act 2012 (Cth)</p> <p><b>Victoria</b></p> <p>Accident Compensation (Occupational Health and Safety) Act 1996 (Vic)</p> <p>Australian Consumer Law and Fair Trading Act 2012 (Vic)</p> <p>Charter of Human Rights and Responsibilities Act 2006</p> <p>Charter of Human Rights and Responsibilities (General) Regulations 2017</p> <p>Competition and Consumer Act 2010 (Vic)</p> <p>Compliance Code Psychological Health (Vic)</p> <p>Corporations (Victoria) Act 1990 (Vic)</p> <p>Crimes Act 1958 (Vic)</p> <p>Dangerous Goods Act 1985 (Vic)</p> <p>Disability Act 2006 (Vic)</p> <p>Equal Opportunity Act 2010 (Vic)</p> <p>Gender Equality Act 2020</p> <p>Health Records Act 2001 (Vic),</p> <p>Long Service Leave Act 2018 (Vic)</p> <p>Mental Health and Wellbeing Act 2022 (Vic)Occupational Health and Safety Act 2004 (Vic)</p> <p>Occupational Health and Safety Regulations 2017 (Vic)</p> <p>Occupational Health and Safety (Psychological Health) Regulations 2025 (Vic)</p>
--

Payroll Tax Act 2007 (Vic)  
Privacy and Data Protection Act 2014 (Vic),  
Public Holidays Act 1993 (Vic)  
Public Records Act 1973 (Vic)  
Racial and Religious Tolerance Act 2001 (Vic)  
Spent Convictions Act 2021 (Vic)  
Workplace Injury Rehabilitation and Compensation Regulations 2024 (Vic)  
Workplace Injury Rehabilitation and Compensation Act 2013 (Vic)

## **Queensland**

Anti-Discrimination Act 1991 (Qld)  
Corporations (Administrative Actions) Act 2001 (Qld)  
Crime and Corruption Act 2001 (Qld)  
Disability Services Act 2006 (Qld)  
Domestic and Family Violence Protection Regulation 2023 (Qld)  
Domestic and Family Violence Protection Rules 2014 (Qld)  
Education (Work Experience) Act 1996 (Qld)  
Electrical Safety Code of Practice 2021 Managing electrical risks in the workplace (Qld)  
Environmental Protection Act 199 (Qld)<sup>4</sup>  
Fair Trading Act 1989 (Qld)  
Fair Work (Commonwealth Powers) and Other Provisions Act 2009 (Qld)  
Health and Wellbeing Queensland Act 2019 (Qld)  
Holidays Act 1983 (Qld)  
Human Rights Act 2019 (Qld)  
Human Rights Regulation 2020 (Qld)  
Information Privacy Act 2009 (Qld)  
Information Privacy Regulation 2025 (Qld)  
Payroll Tax Act 1971 (Qld)  
Payroll Tax Regulation 2019 (Qld)  
[Queensland Dangerous Goods Act 1985](#) (DG Act) (Qld)  
Work Health and Safety Act 2011 (Qld)

	Work Health and Safety Regulation 2011 (Qld) Work Health and Safety and Other Legislation Amendment Act 2024 (Qld) Workers' Compensation and Rehabilitation Act 2003 (Qld) Workers' Compensation and Rehabilitation Regulation 2025 (Qld)
--	--

Note:

GB = Governing Board

EMT = Executive Management Team