



RECORDS MANAGEMENT POLICY

Records Management Policy		
Code: E2.23	Area: Non-Academic E	
Policy Owner: EMG	Version #: 2.3	Date: 19 Apr 2024
Policy Developer/Reviewer: CEO	Review date: 19 Apr 2027	

VERSION HISTORY

Version	Updated by	Approval Date	Details
1.0	EMG	21 Jan 2011	Document creation.
2.0	EMG	14 Jan 2020	Comprehensive review and update.
2.1	EMG	7 Dec 2020	Updated staff and student record requirements under Meshed and aXcelerate software.
2.2	PRG	4 Jan 2022	Updated policy to reflect that all records are now stored online.
2.3	EMG	19 Apr 2024	Scheduled review, removed reference to aXcelerate software.

PURPOSE AND SCOPE

The purpose of this policy is to:

- Establish a framework for effective records management at the Sydney Institute of Traditional Chinese Medicine (SITCM);
- Outline processes for the creation and maintenance of records as needed to completely and accurately record the functions, activities, transactions, operations, policies, procedures, administration and management of SITCM; and
- Safeguard all records held from unauthorised access.

This policy applies to all staff and students at SITCM.

1 OVERVIEW

As a higher education provider, SITCM has volumes of records relating to its teaching, research, students, staff, finances and other activities. An effective record-keeping program is therefore paramount in its commitment to administrative transparency and accountability. SITCM maintains both paper and electronic records to efficiently conduct its operations and to fulfil its various obligations generally.

This policy has been informed by the *Higher Education Standards Framework (Threshold Standards) 2021*, in particular Section 7.3 Information Management, the *Education Services for Overseas Students Act 2000* and the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*.

2 POLICY

2.1 RESPONSIBILITY

- 1) The ultimate responsibility for records management rests with the CEO.
- 2) Management level staff are responsible for maintaining sound record-keeping practices within their departments.
- 3) Staff members are responsible for the creation and maintenance of records as needed to completely and accurately record the functions, activities, transactions, operations, policies, procedures, administration and management of SITCM.
- 4) In carrying out any records management function, staff members must observe security, privacy and confidentiality requirements at all times, in accordance with the *Privacy Policy*.
- 5) It is suggested best practice for students to retain assessments, records of competencies or statements of attainment that they receive from SITCM.

2.2 CREATION OF RECORDS

- 1) Staff members are empowered to create and maintain records that adequately document business activities in which they take part.
- 2) Records should be full and accurate, as required to facilitate action or to otherwise protect the financial, legal and other rights of SITCM, its clients and stakeholders affected by its decisions.

2.3 TYPES OF RECORD

2.3.1 STUDENT RECORDS

- 1) A student's record comprises their paper and electronic files which are maintained by the Registrar and supported by Administration Officers.
- 2) As a minimum, each student's record contains the following information:
 - a. On the internal SITCM server (some pre-2021 records may be securely stored on paper instead):
 - i. All application documents outlined in 2.3.1(3);
 - ii. A Commonwealth Assistance Form (CAF), in the form of:
 - A. A *Request for FEE-HELP Assistance Form* and/or an *Electronic Commonwealth Assistance Form* (eCAF) (for applicable Bachelor Traditional Chinese Medicine (BTCM) students only); or
 - B. An *Electronic Commonwealth Assistance Form* (eCAF) (for applicable VET Student Loans students only);
 - iii. *VET Student Loan Statement of Covered Fees* (if applicable);
 - iv. *VET Student Loans Fee Notice* (if applicable);
 - v. *Commonwealth Assistance Notices* (if applicable);
 - vi. Any forms that the student submitted to SITCM in accordance with SITCM policies;
 - vii. Any formal grievances submitted by the student;
 - viii. Any findings of misconduct made against the student;
 - ix. Any support plans that the student is or has been on;
 - x. Results for each assessment event and each unit that the student has completed (BTCM students only);
 - xi. Unit of study results for each semester that the student was enrolled in at least one unit, in the form of:
 - A. A *Unit of Study Results – Current*; and/or
 - B. An *Official Academic Transcript*

- xii. A *Senior First Aid Certificate, Working with Children Check* and *National Police Clearance Certificate* (for all BTCM students who are or have been enrolled in the unit ACU207);
 - xiii. A copy of all qualifications issued; and
 - xiv. All completed student assessment items comprising the actual work completed by a student or evidence of that work, including evidence collected for a Recognition of Prior Learning (RPL) process (for VET students only).
- b. On Meshed:
- i. Personal details;
 - ii. Results for each assessment event and each unit that the student has completed;
 - iii. Student attendance information;
 - iv. Any forms in relation to a student that were submitted to SITCM in accordance with SITCM policies;
 - v. Details of payments and refunds; and
 - vi. Details of qualifications issued.
- 3) "Application documents" include the following:
- a. A *Higher Education Enrolment Application Form* (for BTCM students) or *VET Enrolment Application* (for VET students);
 - b. Any qualifications, certificates or other documents required under the *Student Admissions Policy and Procedure* (for BTCM students) or *VET Student Admissions Policy and Procedure* (for VET students);
 - c. Proof of Australian citizenship or permanent residency (if applicable);
 - d. *Electronic Confirmation of Enrolment (eCoE)* (international students only); and
 - e. A signed *Letter of Offer*.
- 4) All student records are maintained for at least two (2) years from their graduation or when they cease to be a student.
 - 5) All student exams are maintained for at least one (1) year from the date the student is notified of the exam result.
 - 6) All other student assessments are provided to the student for safekeeping as soon as possible after grading.
 - 7) Financial records relating to a student are kept for a minimum of seven (7) years.
 - 8) Student results for each unit of study are retained for at least 30 years, to enable the re-issue of qualification and transcript(s) where required.
 - 9) In the event of the closure of a VET course, electronic copies of the records for each student who was enrolled in the course will be transferred to the Australian Skills Quality Authority (ASQA).
 - 10) In the event of the closure of a Higher Education course, SITCM and/or the Tertiary Education Quality and Standards Agency (TEQSA) will ensure that there are mechanisms in place for affected students to access copies of the results and relevant academic records to support transition to further study.
 - 11) Students may request access to information in their files from the Administration Office.

2.3.2 STAFF RECORDS

- 1) The Dean is responsible for Higher Education academic staff records.
- 2) The Associate Dean is responsible for VET academic staff records.
- 3) The Quality Assurance Manager is responsible for non-academic staff records.

- 4) Staff records are stored on the SITCM internal server (some pre-2021 records may be securely stored on paper instead), and are created and maintained to record:
 - a. An employment agreement;
 - b. A job description;
 - c. A CV (for academic staff, this must be annually updated);
 - d. A copy of any qualifications claimed (either certified, or with the original physically sighted by the responsible SITCM officer);
 - e. Any professional development activity;
 - f. A completed *Induction Checklist*;
 - g. A declaration that they have read and understand SITCM's *Staff Manual*; and
 - h. A declaration that they have read and understand SITCM's *Emergency Procedures for Staff*.
- 5) Original documentation must be sighted to verify the authenticity of qualifications.
- 6) Disciplinary action or details of grievances in which the staff member is a respondent may also be noted in the staff file.
- 7) Staff may request access to information on their files from the Dean, Associate Dean or Quality Assurance Manager.
- 8) All staff records will be retained for at least five (5) years after the staff member's employment at SITCM ceases.

2.3.3 GOVERNANCE BODY MEMBERSHIP RECORDS

- 1) The Governance Officer maintains governance body membership records.
- 2) Governance body membership records are stored on the SITCM internal server (some pre-2021 records may be securely stored on paper instead).
- 3) Board of Directors membership records must include a:
 - a. Letter of appointment;
 - b. CV;
 - c. Fit and Proper Person Declaration;
 - d. Insolvency check;
 - e. Police check; and
 - f. Any other important documentation deemed necessary.
- 4) Other governing body membership records must include a:
 - a. Letter of appointment;
 - b. CV; and
 - c. Any other important documentation deemed necessary.
- 5) Original documentation must be sighted to verify the authenticity of qualifications.
- 6) Governance Body members may request access to information on their files from the Governance Officer or CEO.
- 7) All governance body member records will be retained for at least five (5) years after the staff member's appointment at SITCM ceases.

2.3.4 CLINIC RECORDS

- 1) The Clinic Manager maintains all Clinic records.
- 2) All clinic records are maintained both on SmartTCM and on paper.
- 3) All clinic records will be retained for at least seven (7) years after the patient's last visit.
- 4) Clinic patient records are maintained in accordance to the *Manual for Clinical Practice (BTCM)*.

2.3.5 FINANCIAL RECORDS

- 1) The Financial Manager maintains financial records.

- 2) Electronic financial records are maintained in MYOB. A daily backup to the SITCM server is taken. Hard copy financial records are filed by the Finance Manager and kept in a secured (i.e. locked) filing cabinet.
- 3) Hard copy financial records are destroyed after seven (7) years.
- 4) For more information, please refer to Clause 2.4.1 of the *Financial Management Policy and Procedures*.

2.4 SECURITY AND ACCESS

- 1) SITCM safeguards the rights and interests of all stakeholders that provide permission for the storage of their personal data, in accordance with SITCM's *Privacy Policy*.
- 2) Anyone acting on behalf of SITCM is required to maintain appropriate confidentiality when dealing with the personal data of SITCM stakeholders, whether such records are in paper or electronic form.
- 3) Access to staff, student and patient records is only granted when doing so would not breach any part of the *Australian Privacy Principles*.

2.4.1 PHYSICAL RECORDS

- 1) Physical records are kept in locked filing cabinets in rooms that can only be accessed by a passcode.
- 2) Access to physical records is only available to authorised personnel.

2.4.2 ELECTRONIC RECORDS

- 1) SITCM's electronic records are secured from unauthorised access by anti-virus software, firewalls and other security measures.
- 2) Refer to the *IT Management Policy and Procedure* for further information on electronic records.

3 RELATED POLICY AND OTHER DOCUMENTATION

- 1) Higher Education Standards Framework (Threshold Standards) 2021.
- 2) Standards for Registered Training Organisations (RTOs) 2015.
- 3) Education Services for Overseas Students Act 2000.
- 4) National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- 5) Induction Checklist.
- 6) Staff Manual.
- 7) Emergency Procedures for Staff.
- 8) Manual for Clinical Practice (BTCM).
- 9) Financial Management Policy and Procedures.
- 10) Privacy Policy.
- 11) Request for FEE-HELP Assistance Form.
- 12) Electronic Commonwealth Assistance Form (eCAF).
- 13) VET Student Loans Statement of Covered Fees.
- 14) VET Student Loans Fee Notice.
- 15) Commonwealth Assistance Notice.
- 16) Unit of Study Results – Current.
- 17) Official Academic Transcript.
- 18) Senior First Aid Certificate.
- 19) Working with Children Check.
- 20) National Police Clearance Certificate.
- 21) Higher Education Enrolment Application Form.

- 22) VET Enrolment Application Form.
- 23) Student Admissions Policy and Procedure.
- 24) VET Student Admissions Policy and Procedure.
- 25) Electronic Confirmation of Enrolment (eCoE).
- 26) Letter of Offer.
- 27) Australian Privacy Principles.
- 28) IT Management Policy and Procedure.