

Policy number	78	Version	3
Approved by Board on	15 August 2019	Scheduled review date	August 2022

1. Summary

The purpose of this policy is to establish a framework for the creation and management of records within the National Institute of Organisation Dynamics Australia (NIODA). NIODA is committed to establishing and maintaining recordkeeping practices that meet its business needs, accountability requirements and stakeholder expectations.

2. Policy statement

NIODA's records are its corporate memory, and as such are a vital asset for ongoing operations, providing valuable evidence of business activities and transactions.

NIODA recognises its regulatory requirements as an accredited Higher Education Provider. NIODA is committed to implementing best appropriate recordkeeping practices and systems to ensure the creation, maintenance and protection of accurate and reliable records. All practices concerning recordkeeping within NIODA are to be in accordance with this policy and its supporting procedures.

3. Scope

This policy applies to all staff and students within NIODA.

This policy applies to all aspects of NIODA's operations. This includes but is not limited to:

- all records created during business transactions
- all student and staff records
- all applications used to create records including forms, emails, database applications, bookkeeping system, internal platform and NIODA's website

This policy provides the overarching framework for any other corporate recordkeeping policies, practices or procedures. It also covers the eventuality of record access to staff or students in the event that NIODA ceases to operate.

4. Policy context

NIODA's recordkeeping policies and practices are integrated with the organisation's broader information management regime (including business systems and knowledge management). NIODA's Executive Management Committee will develop all recordkeeping strategies, and is responsible for the design, implementation and review of all recordkeeping practices.

5. Legislation and standards

NIODA acknowledges the following laws that relate to records and information:

- Archives Act 1983
- Electronic Transactions Act (VIC) 2000
- Evidence Act (VIC) 2008

- Freedom of Information Act 1982
- Privacy and Data Protection Act 2014 (VIC)
- Privacy Act 1988
- Higher Education Support Act 2003

NIODA will develop recordkeeping systems that capture and maintain records with appropriate evidential characteristics in accordance with its obligations under these pieces of legislation.

NIODA is committed to best appropriate practice recordkeeping, and will develop recordkeeping systems consistent with the Australian Standard for Records Management (AS ISO 15489).

6. Recordkeeping systems

NIODA's recordkeeping systems are dedicated to the creation and maintenance of authentic, reliable and usable records for as long as they are required to effectively and efficiently support business functions and activities.

The recordkeeping systems will manage the following processes:

- creation or capture of records within the recordkeeping system
- storage of records
- protection of record integrity and authenticity
- security of records
- access to records
- disaster recovery of electronic records and
- disposal of records - Unless otherwise authorised, all record disposal within NIODA must be undertaken in compliance with the organisation's approved disposal guidelines.

7. Responsibilities

The NIODA Board of Governance is responsible for the authorisation of the recordkeeping policy. The Chief Executive Officer with support from the NIODA Executive Management Committee (EMC) must manage this policy within NIODA.

The NIODA EMC is responsible for overseeing the design, implementation, and maintenance of this recordkeeping policy, as well as monitoring compliance.

The EMC is responsible for managing records and recordkeeping within NIODA consistent with the standards described in this policy.

The EMC is also responsible for maintaining the technology for NIODA's recordkeeping systems; including responsibility for maintaining the integrity and authenticity of records and for supporting and monitoring staff recordkeeping practices as defined by this policy. Creation, and support for the creation of records, by staff is a part of normal business practices.

All staff are responsible for the creation of accurate and reliable records as defined by this policy.

8. Records Security

Records generated by NIODA are stored electronically and backed up in two secure hard drives (currently locked home office computers), one external hard drive and a secure cloud-based data storage facility. All paper records are stored in the home office of the Office Manager in a locked filing cabinet or cupboard.

Access to all documents will be through application in writing to the **Office Manager**. The **Office Manager** will be authorised to respond to requests for student records of results, Testamurs and Statement of Attainments, however, must gain authorisation from the CEO for any other request.

Any decision to allow access to records must comply with NIODA's Privacy Policy.

NIODA's strategy for disaster recovery covers electronic and paper based records. All paper records are scanned and stored electronically. As above, to mitigate risk in the case of theft or disaster, all records are backed up in four separate hard drives in four locations:

- current paper records to be stored in lockable filing cabinets
- archived paper records to be stored in lockable cupboards
- electronic records to be secured by password protection
- secure password protected cloud-based storage

In the event that any records received that cannot be digitised, the receipt and document significance is noted electronically as proof of its existence.

9. Student Files

The student information below is stored in electronic format. The hard-copy Student Files created for each student include the following identifiers for retrieval purposes:

- given name
- family name
- student identification number

Academic Student Files shall contain all information pertinent to the student's enrolment, administration, academic progress, and completion (where relevant). The Academic Student File must contain the following:

- All written communication with the student;
- Evidence from the following student related activities:
 - enrolment documentation / information
 - Fee Help documentation (where applicable)
 - student ID
 - year commenced
 - program code
 - program name
 - assessment record for the period of enrolment
 - program completion and graduation.

10. Data Retention Considerations

When determining whether a record is to be retained, archived or disposed of, the following guidelines are to be followed:

- administrative value – Do the records still support an ongoing function?
- legal value – Will the records be needed in the event of future litigation. What are the legislative requirements? Most records should be retained for seven years. Academic records to be retained for twenty-five years.
- financial value – Do the records relate to any current or on-going financial transaction? Most can be disposed of after seven years.
- historical value – Does the record reflect significant historical patterns or policies that have shaped NIODA?

11. Recordkeeping Technology

NIODA's policy is to use technology to support its record keeping systems. Upgrades and technology changes are considered annually as part of the business systems and risk reviews. NIODA favours a secure cloud based technology solution engineered for education providers because of ongoing access to technology expertise otherwise not feasible to maintain within NIODA's own capability. The following systems are cloud based:

- financial records (**Xero**). **The Office Manager, the CEO, the deputy CEO and the auditor** have log in access to the NIODA Accounting system with capacity to manage and change records.
- Email. Access to management of the **Google Education Suite** email account is only available to the **Office Manager, the CEO** and Ross Hazeldine of Webhand.
- document management
- student records
- NIODA website hosted by VentraIP and managed by Webhand.

NIODA has a dedicate computer for reporting the Department of Employment and Training (DET) which is only connected to the internet while data is being processed.

Note - In January 2018 financial systems management and reporting were changed from MYOB software to Xero. The rationale for this was to utilize the best financial software available. Aside from some problems with transferring to Xero in early 2018 Xero has shown to be a far superior financial management system for NIODA in that it has online, multi user capacity and it has direct transfer of bank transaction details

During this phase, the technology emphasis is on adequacy without over investment. Initial reliance is therefore on using the Microsoft Office suite file formats. Student records beyond financial records are in Excel format. In NIODA's foreseeable future the projected student records total 200 (five years with an annual average of 40 students). While this is not an insignificant number of records, it is well within the capabilities of Excel and does not pose a significant risk with respect to records maintenance or technology upgrades. In future years it is envisaged that a cloud based student records management system will be used.

NIODA takes into account the number of users of each system as part the criteria for technology selection. In the case of student records management there is one primary administrator. Multi user access is not expected to be required in the initial few years of operation. NIODA also considers Excel a

favourable choice as it has considerable data flexibility and reporting capabilities, which is important while the business processes and specific detail requirements are bedded down. The requirements are reviewed annually to assess the system adequacy.

NIODA's financial records management system is an industry standard cloud based system. It is hosted at the service provider's premises and the service provider is responsible for data backup and disaster recovery. NIODA is responsible for auditing the service provider's processes and procedures with respect to security, backup and disaster recovery.

12. Publication

This policy is publicly available on NIODA's website at <https://www.nioda.org.au/policies>.

13. Related Documents

Privacy Policy

Archives Act 1983

Electronic Transactions Act (VIC) 2000

Evidence Act (VIC) 2008

Freedom of Information Act 1982

Privacy and Data Protection Act 2014 (VIC)

Privacy Act (1988)

Higher Education Support Act 2003