

Policy number	P106	Version	4
Approved by Board on	5 Sep 2020	Scheduled review date	Sep 2023

## 1. Policy statement

The National Institute of Organisation Dynamics Australia Ltd (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 a Institute of Higher Education. NIODA is committed to implementing best appropriate record keeping 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.

## 2. 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 student and staff records
- all records created during business transactions
- 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 develops all record keeping 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's recordkeeping systems capture and maintain records with appropriate evidential characteristics in accordance with its obligations under these pieces of legislation.

## 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 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 and overseeing of the recordkeeping policy. The Chief Executive Officer (CEO) 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. A report of compliance is submitted to the Board of Governance annually.

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), and a secure cloud-based data storage facility. All archival paper records are stored at NIODA's registered address in a locked filing cabinet.

Access to all documents is through application in writing to the Administration Lead. The Administration Lead is authorised to respond to requests for candidate and 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 current records are stored electronically. As above, to mitigate risk in the case of theft or disaster, all records:

- archived paper records are stored in a locked filing cabinet
- electronic records are secured by password protection
- secure password protected cloud-based storage

## 9. Student Files

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

- given name
- family name
- student identification number

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

- Evidence from the following student related activities (where applicable):
  - enrolment documentation / information
  - FEE-HELP documentation
  - student ID
  - year commenced
  - program code
  - program name
  - assessment record for the period of enrolment
  - special consideration applications and approvals
  - Credit Transfer and Recognition of Prior Learning applications and approvals
  - appeal and grievances documentation
  - program completion and graduation
  - any other significant documentation related to the student life cycle

## 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 Administration Lead, the CEO, the deputy CEO and the auditor** have login 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 Administration Lead, **the CEO** and Ross Hazeldine of Webhand (IT support provider).
- document management
- student records
- NIODA website hosted by VentralP and managed by Webhand.

NIODA has a dedicated computer for reporting to 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 of NIODA's growth, 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 to 2025 the projected student records total requirement is for 100 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 years beyond 2025 it is envisaged that a cloud based student records management system will be used.

## 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

Australian Standard for Records Management (AS ISO 15489)