

# Records and Data Management Procedure - Records

## Purpose

1. This Procedure outlines the processes for the capture, storage, use, sharing, retention, archiving and disposal of official records of GHE.

## Scope

2. This Procedure applies to all GHE staff and all records in all formats, including all documents that provide objective evidence of activities performed, events occurred, decisions made, results achieved, or statements made in relation to individual students, cohorts of students, or corporate business and governance activities.
3. Records include but are not limited to legal contracts and agreements, electronic communication, letters, forms, teaching materials including content delivered via the Learning Management System, memos, drawings, letters, podcasts, videos, photographs and transcripts of verbal communication.

## Definitions

4. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

## Suite documents

5. This Procedure is linked to the following suite documents:
  - a) Records and Data Management Policy;
  - b) Records and Data Management Procedure – Data;
  - c) Records and Data Management Procedure – Records: Schedule One - Records Retention and Disposal Authority.

## Procedure

### Records structure and systems

6. All GHE records, as defined in the scope of this Procedure, must be created, collected, classified, and organised in a manner that ensures their integrity, quality and security.
7. There are five broad categories of records:
  - a) *Corporate*: for all corporate functions. All staff have access to these;
  - b) *Student*: for all student-related records. Access to student records is limited;
  - c) *Personnel*: for Human Resources related records. Access to human resource records is limited;
  - d) *Executive*: for briefings, correspondence and other records pertaining to senior management. Access to executive records is limited;
  - e) *Governance*: for briefings, correspondence and other records pertaining to governance committees and boards. Access to governance records is limited.

8. An approved system must, at a minimum, meet basic records management criteria. These criteria include the functionality to:
  - a) manage electronic records, scanned images, voice files, video clips, digital plans, databases and information from other applications;
  - b) integrate with applications used for transaction of business (office utilities, e-mail, websites, database applications, workflow, etc.);
  - c) capture records by assigning them unique identities and attributing brief descriptive information to them, such as a title and date;
  - d) arrange records into categories based on the business activities they document, as a means of facilitating record control, retrieval, disposal and access;
  - e) assign and implement rights or restrictions that protect records against unauthorised or inappropriate use or access;
  - f) establish access points to facilitate record retrieval;
  - g) monitor record use to ensure no inappropriate use occurs and an auditable record of use is maintained;
  - h) link disposal periods to records;
  - i) make records available as corporate information resources;
  - j) identify and present records in response to user search requests and, where appropriate, enable records to be printed on request.
9. It is the responsibility of the Operations Director to assess all records management systems for compliance with the basic records management criteria before they are implemented or before records are migrated to or from the system.
10. A major change to an existing system must also be assessed for compliance by the Operations Director prior to implementation.
11. To maintain the integrity of the records management system, changes to the structure (folders, cabinets etc.) of the system must be approved by the Operations Director.
12. To maintain the security of the records management system changes to the security settings on folders, cabinets or specific documents must be approved by the Operations Director.

### **Records capture and storage**

13. It is the responsibility of all staff to capture records where a document provides objective evidence of activities performed, events occurred, decisions made, results achieved, or statements made in relation to individual students, cohorts of students, or corporate business and governance activities relevant to their position.
14. All records must be captured in the approved records management system.
15. Records that are created by the approved records management system must be stored in that system.
16. Records, including emails that are not created and/or stored in an approved business system, must be stored in the corporate records management system, PinPoint.
17. It is the responsibility of the staff member capturing the record to ensure sufficient metadata is included to enable other staff to easily understand when, how, where, why and on whose authority actions took place and decisions were made.
18. Corporate records must not be stored or maintained in email folders, shared drives, personal drives or external storage media.

## **Records use and share**

19. Access to records is only permitted by authorised members of staff or external members of governance boards and committees who require access for official business.
20. Under no circumstances are records to be accessed or used for non-GHE related business.
21. Personal information held on records must only be used for the purpose for which it was collected and must only be disclosed to authorised persons.
22. Records containing personal information must be captured, stored, accessed, and disposed of in line with the requirements of relevant legislation.
23. Hard-copy records stored within business areas must be secured to avoid possible theft, misuse or inappropriate access.
24. Staff leaving GHE or changing roles within the organisation are responsible for ensuring records in their custody are made available intact and, in their entirety, to authorised staff. This includes transferring the custody of hard copy records and ensuring records stored in Outlook and/or network drives have been registered in PinPoint.

## **Records archiving and disposal**

### *Archiving*

25. Provisions for the retention and disposal of records are outlined in the Records Retention and Disposal Authority attached as Schedule One to this Procedure.
26. Hardcopy records no longer required for daily business activity that have not met the requirements for disposal should be transferred to GHE's approved offsite archive facility.
27. Storage at other offsite storage facilities is not permitted.
28. Authority to transfer hardcopy documents must be obtained from the Operations Director.
29. Records must be boxed in C1 archive boxes.
30. Where multiple record types exist, records are to be placed with similar records of the same class, or retention period.
31. Records containing sensitive or personal information are to be stored separately to records of a general nature.
32. An Archives Lodgement Form is to be completed and a copy placed inside the top of each box.

### *Disposal of hardcopy records*

33. The following steps are to be followed for the destruction of hardcopy records that are time-expired:
  - a) order a destruction bin;
  - b) complete a Records Destruction List;
  - c) ensure the Records Destruction List is signed by the member of staff with the authority to dispose of the record as specified in the Records Retention and Disposal Authority and the Operations Director (where the Operations Director is not the designated authority);
  - d) scan the signed Records Destruction List and save electronically in PinPoint;
  - e) place the records in the destruction bin;
  - f) arrange collection of the bin.
34. Records will be disposed of by a secure records and information disposal service.

### *Electronic records*

35. The Operations Director will arrange for reports to be run periodically to identify records that are eligible for destruction based on the disposal class (see Records and Data Management Policy).
36. The member of staff with the authority to dispose of time-expired records as specified in the Records Retention and Disposal Authority and the Operations Director authorise destruction of the records. Destruction of the records cannot proceed without the authorisation of both officers, except where the Operations Director is the designated authority.
37. The authorised records will be destroyed and information (metadata) about the destroyed records is kept in PinPoint.

### **Roles and responsibilities**

38. The Board of Directors is responsible for the oversight of this Procedure.
39. The Operations Director is responsible for:
  - a) approving major changes to existing official records management systems, including to structure and security levels;
  - b) approving the destruction of hard copy and electronic records together with the designated staff member where applicable;
  - c) the maintenance of any records arising from this Procedure.
40. The Manager, Quality and Compliance is responsible for:
  - a) ensuring compliance with this Policy and related procedures;
  - b) benchmarking GHE policy and standards with those adopted elsewhere in the higher education sector;
  - c) the monitoring of information available from the review of records relating to the implementation of this Procedure.
41. All staff are responsible for becoming familiar and complying with this Procedure.

## Associated information

<b>Related Internal Documents</b>	<p>Records and Data Management Policy  Records and Data Management Procedure - Data  Records and Data Management Procedure – Records: Schedule One -  Records Retention and Disposal Authority.  Academic Progress Policy  Admissions Policy  Assessment Policy  Enrolment Policy  Financial Framework  Governance Framework  Human Resources Framework  Quality Assurance Policy  Risk Management Policy  Strategic Plan  Student Complaints, Grievances and Appeals Policy  Student Disability Policy  Student Diversity and Equity Policy  Student Sexual Assault and Sexual Harassment Policy  Teaching and Learning Plan  Glossary of Terms</p>
<b>Related Legislation, Standards and Codes</b>	<p><i>Tertiary Education and Quality Standards Agency Act 2011</i>  <i>Higher Education Standards Framework (Threshold Standards) 2021</i>  TEQSA Guidance Notes: <i>Corporate Governance, Version 2.4, Academic Governance, Version 2.3, Monitoring and Analysis of Student Performance, Beta Version 1.0</i>  <i>Education Services for Overseas Students Act 2000</i>  <i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i>  <i>Freedom of Information Act 1991</i>  <i>Information Privacy Principles (IPP)</i>  <i>State Records Act 1998 (NSW)</i>  <i>State Records Act 1997 (SA)</i></p>
<b>Date Approved</b>	1 May 2020
<b>Date of Effect</b>	1 May 2020
<b>Date of Review</b>	June 2026
<b>Approval Authority</b>	Board of Directors
<b>Policy Custodian</b>	Chief Executive Officer
<b>PinPoint DocID</b>	2696

## Change history

Version Control		Version 1.4
Change Summary	23-Apr-20	V1.0 Draft approved by Board of Directors (BoD) 1 May 2020
	23-July-20	V1.1 Administrative updates
	29-Nov-21	V1.2 update for HESF 2021
	27 Jan-23	V1.3 minor amendment to schedule to respond to TEQSA feedback approved by CEO
	29-Jun-23	V1.4 minor amendment to schedule re student transfer documentation approved by CEO 29-Jun-23 plus administrative updates following TEQSA registration

Warning - Document uncontrolled when printed! The current version of this document is maintained on the GHE website at <https://www.globalhe.edu.au/policy>

# Schedule One

## Records Retention and Disposal Authority

Record	Record Description	Period of Retention	Authority to Dispose
'At risk'	Records relating to students identified 'At Risk'.	Two years after graduation	Academic Director
Accounts payable	Records documenting expenditure. Creditors can be internal staff or external parties. Includes petty cash, purchase and sale invoices, receipts, credit card receipts, cash disbursement, cheques, ex-gratia payments, and cab charge vouchers.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Accounts receivable	Records documenting payments made to GHE. Includes requests for payments, GHE purchase and sale invoices and receipt books.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Accreditation	Records associated with processes involved in negotiating the content and structure of academic courses to comply with industry and professional standards.	Ten years after accreditation expires	Academic Director
Ad hoc student support	Records documenting the provision of ad hoc individual academic support to students. Includes checking of individual assignments for language issues, and any editorial assistance provided.	Two years after graduation	Academic Director
Annual financial statements	Annual financial statements and associated background documentation. Includes balance sheets, operating statements, cash flow statements and accompanying notes, consolidated financial statements, statements of financial position.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Assessment and examination content	Records documenting the development of assessment examination content. Includes working papers, draft examination question papers etc.	One year after last action completed	Academic Director
Assessment materials	Essays and assignment papers or other assessable materials not collected by students. Includes materials and content submitted by students to the Learning Management System (LMS).	One year after results published	Academic Director

Record	Record Description	Period of Retention	Authority to Dispose
Assessment moderation	Moderation of student assessment tasks, and any evaluation undertaken of the suitability of the assessment task. Includes examiners' reports, marking sheets, moderation reports, and marking guidance provided to staff.	Two years after the end of the appeal period	Academic Director
Bank details	Records documenting the administration of GHE bank accounts and use and reconciliation of corporate purchasing cards. Includes deposit records, bank statements, bank reconciliation statements, investment and dividend statements, records documenting the use of credit cards, cheque books, cheque butts and cancelled cheques.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Boards and committees	Records associated with the operation of board of directors, governance committees, operational committees and associated working groups.	Permanent	Nil
Branding	Records associated with the use of GHE brand. Includes style manuals and Brand Guidelines System.	Dispose after reference use ceases	Operations Director
Budget	Budget estimates produced for internal use by GHE. Includes budget allocation decisions, allocation of funds, estimates of expenditure, calculations, superseded revisions, costing of annual expenditure, additional estimates.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Budget variations	Records documenting spending progress or revenue collection against allocations within budget estimates. Includes variations to budgets, interim budget reports.	Two years after completion of the financial year in which the record was created	Manager (Finance)
Campus and asset management	Records associated with acquisition, operation, lifecycle management and servicing of the real estate, assets and infrastructure of GHE. Includes: real estate, buildings and fittings, equipment, IT and network infrastructure, machinery, furniture and vehicles.	Ten years from the date the last action	Operations Director
Claims	The activities involved in managing and responding to compensation claims brought against GHE.	Ten years after the claim is resolved	Chief Executive Officer
Compliance	Records associated with GHE's compliance with mandatory or optional accountability, fiscal, legal, regulatory or quality standards.	End of completion of two external compliance review cycles as relevant to the documentation	Manager, Quality and Compliance
Conduct of examinations	Records documenting the arrangements for the conduct of examinations. Includes provisional and final examination timetables, appointment of examiners, printing and distribution of examination papers and script books, booking of exam venues.	One year after last action completed	Operations Director



Record	Record Description	Period of Retention	Authority to Dispose
Conferral of awards	Records associated with the conferral of an award.	Permanent	Nil
Conflict of interest	Records associated with declared conflicts of interest.	Ten years after the declaration	Chief Executive Officer
Contracts/ agreements/MOUs	Final signed version of agreements and Memoranda of Understanding not under seal or of small-scale significance to GHE. Includes records documenting the development, formulation and execution of these agreements and MOUs.	Ten years after the contract/agreement/MOU has expired	Chief Executive Officer
Corrective actions	Records documenting the receipt and response to individual enquiries or the outcome of formal processes which result in recommended changes to GHE policy or procedures.	Permanent	Nil
Course delivery (administrative)	Records documenting administrative arrangements for the delivery of programs/courses. Includes timetables for lectures, subjects, lecture theatres, semesters, tutorials, classroom and theatre allocations and bookings.	Dispose after reference use ceases	Operations Director
Course delivery (content)	Records providing a master set of courses approved.	Permanent	Nil
Course development	Records documenting the planning, development, structure and content of a course. Includes approval documentation, alteration and discontinuation of courses.	Permanent	Nil
Data (scholarship)	Data and datasets created as part of scholarship activities.	Permanent	Nil
Data administration	Records relating to the migration of data between electronic systems and from one electronic medium to another. Include the migration and back-up media data due to version upgrade. Includes strategies for the migration and quality assurance checks to confirm accuracy of the migration process.	One year after migration	Director Operations
Debt recovery	Records documenting debt recovery activities.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Depreciation	Records documenting formal depreciation of GHE assets.	Ten years after disposal of the asset	Manager (Finance)
Determination of fees/charges/fine liability	Records documenting the determination, assessment and notification of liability of other fees and related charges, such as late charges. Includes amenities and services fees, waivers of late fees, refunds, fee debtors, fee write offs, fee credit notes, payment extensions, fee ledger, library fines.	Ten years after notification sent	Registrar

Record	Record Description	Period of Retention	Authority to Dispose
Determination of student refunds	Records documenting the determination, assessment and notification of student refunds.	Ten years after notification sent	Manager (Finance)
Donations	Records documenting the receipt of monetary gifts that result in, for example, the creation of scholarships and prizes, the provision of scholarship or library support or other ongoing value to GHE.	Permanent	Nil
Enquires (general administration)	Records documenting the receipt and response to individual enquiries which require routine responses on GHE actions, policy or procedures. Includes form letters, standard responses, admission and prospective student enquiries.	Two years after last action completed	Registrar
Enquiries (academic)	Records documenting the processes and procedures involved in the handling of enquiries and feedback relating to courses.	Ten years after last action completed	Academic Director
Enrolment	Records documenting the enrolment and re-enrolment of students into a course/ of study and their completion (filed separately to the student file). Includes enrolment forms, deferment, leave of absence, withdrawals, exemptions, credits, variations to enrolment, Recognition of Prior Learning (RPL), academic transcripts etc.	Ten years after completion or abandonment of, or withdrawal, discontinue or termination	Registrar
Examination script books	Examination Script Books - used and unused.	One year after results published	Academic Director
External audit	Final report of an external financial audit.	Ten years after the audit is completed	Manager (Finance)
External audit (general)	Final report of an external audit report. Excluding Financial Audit.	Ten years after the audit is completed	Manager, Quality and Compliance
Financial advice	Records relating to the provision or receipt of detailed and significant financial advice to executive or senior management regarding financial investments, incurred obligations and financial reporting requirements. Includes detailed and high-level advice on the application of specific accounting standards and policies, financial or annual reporting legislation and accounting treatments.	Permanent	Nil
Gifts and benefits	Records documenting the acceptance or refusal of gifts and benefits.	Ten years after completion of the financial year in which the record was created	Manager, Quality and Compliance
Government funding	Records documenting funding received from State or Commonwealth government.	Permanent	Nil
Graduation	Records relating to the administration of graduation ceremonies.	Two years after the event	Registrar

Record	Record Description	Period of Retention	Authority to Dispose
Human resources (appointments)	Records documenting successful applications for appointments which form part of an employee's consolidated employment history. Includes letters of offer and acceptance and confirmation of appointment, reappointment, conditions of appointment, statement of duties, curriculum vitae, referees' reports. Attach to staff file.	Permanent	Nil
Human resources (induction)	Records documenting staff attendance at induction courses.	Two years	Operations Director
Human resources (recruitment)	Records documenting the candidate identification and selection process including recruitment campaigns. Includes make up of interview panels and the interview and referee questions.	Two years after the last action is complete	Operations Director
Human Resources (Remuneration – ancillary payments)	Records documenting the payment of allowances to employees. Includes overtime, first aid, clothing and travelling allowances.	Ten years after payments	Operations Director
Human Resources (Remuneration –salary and wages)	Records documenting the processing of payment of salaries to personnel. Includes payroll documentation not filed on an employee's personnel file, group certificates, employment declaration forms.	Ten years after completion of the financial year in which the record was created	Operations Director
Human resources (security checks)	Records documenting security checks (vetting) carried out as part of pre-engagement, pre-employment and pre-appointment checks, or periodic reviews. Includes checks carried out by police authorities in the relevant jurisdictions.	Permanent	Nil
Human resources (staff development)	Records documenting staff development activities and attendance at same.	End of completion of two external compliance review cycles as relevant to the documentation	Operations Director
Human resources (termination)	Records documenting the termination of staff. Includes resignation, retirement, dismissal, death, redundancy, retrenchment and dispensations of services of temporary personnel.	Ten years after the last action is completed	Operations Director
Human resources (unsuccessful applications)	Records documenting unsuccessful applications for appointments. Includes unsuccessful applications for continuing and non-continuing positions.	Six months after the appointment has been filled	Operations Director

Record	Record Description	Period of Retention	Authority to Dispose
Industrial relations	Records documenting the management of industrial action involving large numbers of staff, or where the provision of services to students and/or staff is substantially compromised, or where the action establishes an industrial relations precedent. Includes strikes, bans, lockouts and other industrial actions which sets precedents.	Permanent	Nil
Insurance	Records documenting issuance and payment of insurance premiums. Includes health, property, motor vehicle, public and product liability, accident, travel, professional indemnity, malpractice insurance. Includes industrial special risk, certificates of currency, liability questionnaires, actuary briefs.	Ten years after the policy expires	Manager (Finance)
Investment	Records documenting investments undertaken by GHE Includes buying, selling, dividends, maturities, short term and long-term investments, short term deposits, equities.	Ten years after the investment matures	Manager (Finance)
Joint ventures and collaboration	Records associated with activities related to engagement and joint ventures with other institutions, government agencies, private sector organisations and community groups. Activities may include initial contact, liaison, information sharing, mutual support and collaboration.	Permanent	Nil
Legal advice	Records documenting requests for legal advice and subsequent responses from lawyers and panel law firms relating to matters of major public interest or controversy, industrial issues, matters which are precedent setting or matters resulting in significant changes to GHE's policies. Includes Copyright Act, Copyright Regulations.	Permanent	Nil
Marketing	Records documenting the development, approval, implementation and administration of designs for GHE logos, marketing materials, letterhead, stationery and publications (including websites) incorporating the corporate brand or image.	End of completion of two external compliance review cycles as relevant to the documentation	Operations Director
Metadata	Master control records for GHE recordkeeping systems. Includes archival management systems, registers and indexes.	Permanent	Nil
Orientation	Records documenting transition and orientation activities and programs designed to provide new and existing students with the opportunity to become familiar with the institution, meet other students, and prepare for study. Includes induction material prepared by specific areas of the institution.	End of completion of two external compliance review cycles as relevant to the documentation	Academic Director

Record	Record Description	Period of Retention	Authority to Dispose
Periodic reports	Periodic reports produced on recurring activities. Includes interim progress reports addressing performance against strategic and operational plans and reports that are not required for the purposes of meeting legislative objectives.	Five years	Chief Executive Officer
Policy	Final, approved versions of policies.	Permanent	Nil
Position descriptions	Records documenting the creation, variation, abolition, transfer or reclassification of positions and assigned duties.	Ten years after position or assigned duties have been abolished or altered	Operations Director
Prizes and scholarships	Records documenting the establishment and management of prizes, scholarships and awards, and the investment of associated funds. Includes evidence of the payment to successful recipients, establishment-foundation papers, recipient register.	Permanent	Nil
Procedure	Final, approved versions of procedures.	Ten years from the date the procedure is superseded	Manager, Quality and Compliance
Quality assurance	Records documenting the analysis and reporting associated with quality assurance (unit, course, cohort monitoring and review. Includes management reports, governance reports as well as external reporting to the Commonwealth. Includes external referencing and benchmarking.	Ten years	Academic Director
Reasonable adjustment/disability support	Records documenting the implementation of a disability support plan or similar, through the provision of reasonable adjustments made for students with disabilities or specific needs. Includes timetabling of resources, equipment and staff required to make these adjustments.	Two years after graduation	Operations Director
Reference material	Records sent to GHE for information/interest.	Dispose after reference use ceases	Discretion of individual members of staff
Risk management	Records documenting the processes associated with strategies for the management of risks. Includes risk assessments, risk registers, treatment schedules and action plans.	Ten years after last action completed	Chief Executive Officer
Schedule of course fees	Schedule of fees and charges.	Ten years after conclusion of the academic year the schedule relates to	Operations Director
Space management	Records documenting the allocation of buildings, offices or workspaces to departments, individual staff, students or vendors.	Five years after the relocation of space	Operations Director

Record	Record Description	Period of Retention	Authority to Dispose
Staff behavioural or academic (incl. research) misconduct	Records associated with the management of breaches of discipline or academic-professional (incl. research) misconduct processes, including investigations and charges. Includes reports, investigations, representations, records of disciplinary action taken and inquiry records.	Fifteen years after the last action is completed	Operations Director
Strategic and operational plans	Final version of strategic and operational corporate and academic plans.	Permanent	Nil
Strategic asset management	Records associated with strategic asset management.	Five years after year of applicability	Operations Director
Student admissions	Records documenting admissions, applications and selection process to a course of study, regardless of outcome.	Two years after commencement date	Registrar
Student non-academic or academic misconduct	Records associated with the management of discipline or academic-professional misconduct processes, including investigations and charges. Includes reports, investigations, representations, records of disciplinary action taken and inquiry records.	Fifteen years after the last action is completed	Academic Director
Student complaints	Records documenting formal complaints.	End of completion of two external compliance review cycles as relevant to the documentation	Manager, Quality and Compliance
Student counselling	Records documenting the provision of support and assistance to students by a professional counsellor. Includes client records, appointment schedules.	Ten years after last attendance or access on behalf of the student	Operations Director
Student grievances	Records documenting formal grievance.	Fifteen years after last action completed	Manager, Quality and Compliance
Student support	Records documenting the provision of programs and activities for extra-curricular academic assistance to students. Includes provision of information, planning and review, lesson plans, tutors.	Two years after graduation	Academic Director
Student transfer	Records documenting all requests from overseas students for a release and the assessment of, and decision regarding, the request	Two years after graduation	Manager, Quality and Compliance
Unit delivery	Unit resources and material used in course delivery. Includes unit outlines, study guides, readings, self-assessment exercises, audio-visual teaching aides, reading lists, assignment lists, textbook lists and lecture notes (hard copy and LMS).	Ten years from date of the end of the teaching period in which the unit was delivered	Academic Director

<b>Record</b>	<b>Record Description</b>	<b>Period of Retention</b>	<b>Authority to Dispose</b>
Submissions	Final versions of submissions on issues directly relating to the GHE's functions and/or concerning public or national interest issues. Includes records documenting the development of submissions.	Permanent	Nil
Taxation	Records documenting the administration of taxation. Includes administration of Goods and Services Tax (GST), Fringe Benefits Tax (FBT), travel diaries, travel receipts, Capital Gains Tax, recipient created tax invoice agreements, tax returns.	Five years after completion of the financial year in which the record was created	Manager (Finance)
Unsatisfactory progress	Records relating to students identified as making unsatisfactory course progress.	Two years after graduation	Academic Director