

## RECORDS MANAGEMENT POLICY AND PROCEDURES 2023

### 1 Name of policy

This is the Records Management Policy and Procedures 2023.

### 2 Commencement

This policy commences the day after the day on which it is registered.

### 3 Policy is binding

Except to the extent that a contrary intention is expressed, this policy binds Navitas Australia Pty Limited (formerly named Study Group Australia Pty Limited) (CRICOS Provider Code: 01682E) trading as Taylors College Sydney (the College), staff, students and affiliates.

### 4 Overview

This policy (and its procedures) outlines the principles and responsibilities in relation to the College's student record management practices, to ensure compliance with regulatory requirements, business continuity, efficiency and consistency in operations and to support the rights and interests of students, staff and stakeholders.

### 5 Application

apply to students enrolled in an English Language Intensive Courses for Overseas Students (ELICOS) course delivered by Navitas Australia Pty Limited (CRICOS Provider Code: 01682E) trading as Taylors College Sydney (the College), to former students, and to staff and affiliates of the College.

- (1) This policy (and its procedures) supplements the Navitas Information Security Policy.
- (2) The USPP Records Management Policy and Procedure is supported by this policy and students enrolled in a USPP must refer to the related policy.

### 6 Definitions

<b>Affiliates</b>	means consultants and contractors to the College, members of the College Committees; and any other persons appointed or engaged by the College.
<b>Applicant</b>	means a person applying for admission to a course offered by the College.
<b>Archiving</b>	means the process of moving of the records that are no longer in use but have continuing value for the organisation, to a separate storage location where they will be retained for future reference and for regulatory compliance purposes.
<b>The College</b>	means Taylors College Sydney, including its staff, affiliates and contractors.

<b>College Archive</b>	means College records that are no longer in use but maintained due to their value for the business. These records may also serve the purpose of responding to regulatory requests.
<b>College Director</b>	means the most senior staff member for the College (or their delegate).
<b>CRICOS</b>	means Commonwealth Register of Institutions and Courses for Overseas Students
<b>Delegate</b>	means a person authorised to perform a specific responsibility.
<b>Department of Home Affairs (DHA)</b>	means the Australian Government department responsible for issuance of student visa and provision of student visa services ( <a href="http://www.homeaffairs.gov.au">www.homeaffairs.gov.au</a> )
<b>Disposal</b>	means removal of records by either permanent retention (archiving), transfer of ownership, or secure destruction.
<b>GA47</b>	means the general retention and disposal authority titled 'Education: Higher & further education and research records (GA47)' approved under section 21(2)c of the NSW State Records Act 1998.
<b>International student/overseas student</b>	means a person (whether physically located within or outside Australia) who holds or needs a visa with rights to study in Australia, and who has the right to enrol at the College.
<b>Metadata</b>	means certain elements added to the records to enhance the people's ability to find, authenticate, use and manage records. Some examples of metadata for records include identifiers, dates, protective markings to identify sensitive records and information.
<b>(College) Record</b>	means any document or other source of information compiled, recorded or stored in written form, on film, by electronic process, or in any other manner or by any other means. Records may include paper-based or electronic documents stored at the College or on systems used by the College, created and maintained by or for the College as part of its business activities and providing evidence of these activities, as required. Documents that are not part of college business related activity, documents of short-term value, drafts or documents created but not used, are not considered 'records' under this policy.
<b>Responsible Officer</b>	means the College staff member or delegate with responsibility for approving the disposal of records in their functional area.
<b>Records Retention and Disposal Schedule</b>	means a document associated with this policy, which lists the minimum times that records should be kept before they are disposed, and provides guidance on record maintenance and disposal.
<b>Retention period</b>	means the duration of time for which a record must be kept before disposal.
<b>Student</b>	means a person who is currently an enrolled student in a Taylors College course (this does not include former students).
<b>University of Sydney Preparation Programs (USPP)</b>	means the non-award pathway programs offered by the University of Sydney and delivered by Navitas Australia trading as Taylors College Sydney. They include the University of Sydney Foundation Program (USFP) and the High Achievers Preparation Program (HAPP).

## 7 Principles

- (1) The College is committed to implementing sound records management to support its operational activities and compliance requirements.
- (2) The College will ensure that information required for business needs is identified. Risks to information or systems that hold records and information are identified and mitigated.
- (3) Appropriate student record management systems will be designed, implemented, and maintained for records in different formats. Record management systems will be compatible with the systems adopted throughout Navitas. Where records are created manually, this will be done as soon as practicable after the event.
- (4) Navitas functional areas will ensure that adequate evidence of college business activity is created and captured. Records must be full, accurate, authentic, reliable and trustworthy to meet business needs.
- (5) All records created or received by staff or affiliates in the course of the College's operations and activities, are owned by Navitas. Contracts which involve outsourcing records management will be entered into having regard to the Navitas Information Security Policy.
- (6) Access to the College's databases will be monitored and controlled. Staff and affiliates will capture records within the scope of their roles, organise records to reflect business processes, ensure records are protected from unauthorised use and provide access to records as required and authorised.
- (7) College staff and affiliates will comply with this policy and with relevant records management legislation. Records are maintained and accessed by staff on a needs basis and in accordance with the Student Privacy Policy.
- (8) College records retention and disposal periods will be set having regard to GA47. At a minimum, records will be retained for the retention periods set out in GA47.

## 8 Records management

- (1) Records in association with this policy will be kept in accordance with this policy. Confidential documents related to the implementation of the policy will be maintained according to relevant privacy requirements.

## 9 Records management practices

- (1) Navitas will ensure that College records are adequately stored in secure and appropriate environments, including electronic, on campus or off campus.
- (2) Each functional area of Navitas will manage the College records for which they are responsible, according to the Records Retention and Disposal Schedule (Appendix A), which aligns with the record keeping legislation and standards applicable to Navitas as updated from time to time.
- (3) College records may be retained for longer periods of time than referenced in the retention schedule, subject to organisational need and the requirements of the University of Sydney. This decision is made by the College Director in conjunction with the Responsible Officer(s).
- (4) At the time they are captured, digital records will be assigned relevant names and metadata to facilitate access and management. Metadata should include date, author and addressee, as a minimum. Audit trails will be kept when digital records are created, amended and deleted. Records received as hard-copy correspondence should be stamped with the date of receipt and marked with the receiver's initials.
- (5) Records management systems and storage facilities will ensure records are protected from unauthorised access, alteration, deletion or loss. Migration of records between systems will be a controlled and documented process. Decommissioning of business systems will be appropriately managed.

- (6) The College will take all reasonable steps to ensure protection and recovery of records in case of a disaster. Electronic files are recoverable on a version-by-version basis, backed-up daily and located simultaneously in different locations.

## 10 Access to records

- (1) All College staff and affiliates must take steps to ensure that records are secure from unauthorised access, potential damage and misuse. Control measures, such as access monitoring, user verification, authorised destruction and security will be implemented to prevent unauthorised access, alteration or destruction of records.
- (2) Records will be accessible to staff and affiliates with business needs and appropriate authority both inside and outside the College, for the retention period set out in the Records Retention and Disposal Schedule (Appendix A). Staff and affiliates should only access records which they have a legitimate need to access in the course of fulfilling their duties. College staff and affiliates can access a confidential file if they are an authorised user, or where an authorised user has granted permission for them to access the file.
- (3) The College Director (or delegate):
  - (a) can authorise as well as limit access to records for college staff, affiliates and students
  - (b) must be notified immediately if loss of personal and/or sensitive information has occurred
- (4) Disclosure of records to parties external to the College must be in accordance with the *Privacy Act 1988* (Cth) and College policies, particularly the Student Privacy Policy.
- (5) Access to records via subpoena or legal warrant will be managed by the College Director (or delegate). If a subpoena or legal warrant addressed to the College is received at a functional area, it should immediately be referred to the CEO of University Partnerships Australasia (or delegate) and no information should be supplied without approval.
- (6) Physical records that are no longer in use but have continuing value for the College will be transferred to and retained as College Archive. Costs associated with the collection and transportation of records to a College Archive are the responsibility of the transferor and/or the record owner. Access to College Archive is restricted and must be authorised by the Responsible Officer. Records must be returned to the College Archive when no longer required, unless permanent removal has been approved by the Responsible Officer.

## 11 Disposal of records

- (1) Approval for the destruction of records must be authorised by the College Director or delegate, and as otherwise required under the Records Management Policy and Procedures. Destruction of records must be undertaken in a secure manner.
- (2) Before records can be destroyed, the Responsible Officer will complete a Records Destruction Authorisation Form for approval by the College Director or delegate. Approval and other documents related to the destruction activities must be retained as set out in the Records Retention and Disposal Schedule (Appendix A).
- (3) Records must not be destroyed if they are the subject of, or it is anticipated that they may be the subject of, subpoena or other formal lawful request for access or relate to any ongoing action such as an appeal. This is regardless of whether the minimum retention period has expired.

## 12 Responsibility areas

- (1) The College Director or delegate is responsible for requiring full and accurate records of college business activities to be created, captured into a recordkeeping system and managed in accordance with this policy and procedures.
- (2) College staff and affiliates are responsible for:

- (a) making and keeping full and accurate records of business activities in which they engage, and
- (b) complying with this policy and procedures.

## 13 Breach of policy

- (1) Staff or affiliates who become aware of a breach or potential breach of this policy must report it as soon as possible to the College Director for appropriate action.

## 14 Rescissions and replacements

- (1) This document replaces the following, which are rescinded as from the date of commencement of this document:

Nil

## NOTES

Records Management Policy and Procedures 2023

Date adopted: 06 September 2023

Date registered: 06 September 2023

Date commenced: 18 September 2023

Administrator: Principal Executive Officer

Review date: At least once every 5 years from the date of commencement.

Rescinded documents: Not applicable

Related documents:

- (1) Education Services for Overseas Students (ESOS) Act 2000 (Cth)
- (2) Education Services for Overseas Students Regulations 2019 (Cth)
- (3) ELICOS Standards 2018
- (4) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)
- (5) Privacy Act 1988 (Cth)
- (6) State Records Act 1998 (NSW)
- (7) Education: Higher & further education and research records (GA47)
- (8) Academic Integrity Policy and Procedures
- (9) Admissions Policy and Procedures
- (10) Assessment Moderation Policy and Procedures
- (11) Attendance Policy and Procedures
- (12) Cancellation and Refund Policy
- (13) Child Protection/Safeguarding Policy
- (14) Critical Incidents Involving Students Policy and Procedures
- (15) Deferment, Suspension, Withdrawal or Cancellation of Enrolment Policy and Procedures

- (16) Monitoring Course Progress Policy and Procedures
- (17) Navitas Information Security Policy
- (18) Records Destruction Authorisation Form
- (19) Safety and Wellbeing of Under 18 Students Policy and Procedures
- (20) Student Assessment Policy and Procedures
- (21) Student Code of Conduct
- (22) Student Complaints and Appeals Policy and Procedures
- (23) Student Disability Policy and Procedures
- (24) Student Enrolment Terms and Conditions
- (25) Student Learning Assistance Policy and Procedures
- (26) Sexual Misconduct Policy and Procedures
- (27) Student Misconduct Policy and Procedures
- (28) Student Privacy Policy
- (29) Student Progression, Exclusion and Completion Policy
- (30) Student Support Procedures

## APPENDIX A: RECORDS RETENTION AND DISPOSAL SCHEDULE

1) GA47 Reference	2) Full Description	3) Retention / Disposal Requirement
1.1.1, 1.1.2	Records relating to admission, enrolment and progress of students. Includes applications for admissions and supporting documents (regardless of decision and outcome and including unsuccessful, incomplete, or withdrawn applications), letters of offer (which have or have not been accepted or have lapsed), written agreements with students, interview records, correspondence regarding applications for admission, receipts of payments made by students under the written agreement, show cause for progression purposes, special considerations affecting enrolment and progression, variations of program, advanced standing, withdrawals, etc.	Retain minimum of 7 years after completion or discontinuation of course or program of study by student, then destroy
1.1.3	Criminal history details provided as part of criminal record checks.  Note: these records should be retained as per the agreement with the criminal history check service provider.	Retain until check completed, then destroy
1.1.5	Records relating to the provision of student identification and the arrangement and management of student concessions.	Retain minimum of 6 years after action completed, then destroy
1.1.6	Records relating to: administrative arrangements for the management of enrolment processes; supporting documentation for variation of student details for graduation; notifications for change of address or contact details.	Retain minimum of 6 years after action completed, then destroy
1.2.1	Records relating to the grading/marking of individual assessment components of a subject or course and determination of final results/grades. Includes: examiner's/assessor's reports and related records; appeals of grades; requests for extension of assessment components for a subject; special consideration arrangements.	Retain minimum of 1 year after end of appeal period or minimum of 1 year after action completed, whichever is longer, then destroy
1.2.2	Records relating to changes to assessment results as a result of moderation, re-marking or appeal by the student.  Note: action completed includes the end of appeal processes and any subsequent appeal rights.	Retain minimum of 7 years after action completed, then destroy

1) GA47 Reference	2) Full Description	3) Retention / Disposal Requirement
1.2.3	Records confirming the award/receipt of a qualification of diploma or above.	Required as State archives
1.2.4	<p>Finalised results obtained by students, where the results are generated as an outcome of some form of assessment.</p> <p>Note: does not include courses which only define whether a participant attended or not.</p>	Retain minimum of 75 years after action completed, then destroy
1.2.6	Finalised results obtained by students for non-award courses	Retain minimum of 120 years after birth of student, then destroy
1.2.7	<p>Records relating to arrangements for graduation and determination and notification of students of their eligibility to graduate. Includes program or order of proceedings.</p> <p>Note: where the program or order of proceedings is the only record confirming details of graduates, it should be sentenced as per entry 1.2.3.</p>	Retain minimum of 1 year after action completed, then destroy
1.3.1	Records relating to the management and delivery of scholarships, prizes, fellowships, awards and honorary awards. Includes applications, nominations, acceptances, unsuccessful candidates, rejected or lapsed offers.	Retain minimum of 7 years after action completed, then destroy
1.3.2	Summary records of recipients of scholarships, prizes, fellowships or awards.	Retain as archives
1.3.3	Records relating to the establishment and conditions of scholarships, prizes, fellowships and awards. This can include terms and conditions for both internal and external scholarships, prizes, and fellowships.	Retain minimum of 10 years after action is completed or fellowship is discontinued, then destroy
1.5.1	Records relating to the management of proven and unproven cases involving allegations of abuse or neglect of children. Includes inquiries and investigations, outcomes, and matters	Retain minimum of 99 years after action completed, then destroy



1) GA47 Reference	2) Full Description	3) Retention / Disposal Requirement
	referred to external bodies for investigation.	
1.5.2, 1.5.3	<p>Records relating to the management of proven and unproven student grievances, complaints and appeals, misconduct and disciplinary cases, preliminary/fact finding investigations that were not formally proceeded with (i.e., the allegations have been found to be unsubstantiated, false, vexatious or misconceived or could not be proven) and the allegation does not involve a child or young person. Includes:</p> <p>inquiries and investigations, outcomes, and matters referred to external bodies for investigation; handling complaints over perceived discrimination, the work/study environment, assessment/assignment organisation or distribution, peers, lecturers, tutors or supervisors, access to equipment, facilities (such as laboratories), tutorials, or other services; disciplinary processes for breaches of by-laws and rules and other student disciplinary matters.</p>	Retain minimum of 7 years after action completed, then destroy
5.1.1	Records relating to the management of alumni associations. Includes the management of membership details, events, activities etc.	Retain until administrative or reference use ceases, then destroy
5.2.1	Records relating to the establishment, negotiation, maintenance and review of agreements to provide and operate services to students, etc. Records include: correspondence and records of negotiations; final, approved versions and significant drafts of agreements; reviews of agreements.	Retain minimum of 7 years after expiry or termination of agreement or after action completed, whichever is later, then destroy
5.2.2	Records relating to the provision of special needs and accessibility services (e.g., interpreters, reading assistance for sight impaired students, disabled access, etc.) and other tailored advisory or study support services and assistance to individual students.	Retain minimum of 7 years after action completed, then destroy
5.2.3	Records relating to unsuccessful applications for student support services.	Retain minimum of 1 year after action completed, then destroy
5.2.4	Records relating to the provision and administration of residential accommodation and placement services for students; careers, employment and general services; mentoring, peer networking services, etc.	Retain minimum of 2 years after action completed, then destroy

1) GA47 Reference	2) Full Description	3) Retention / Disposal Requirement
5.2.5	Records relating to the interaction between the institution and student associations such as the students' union, sporting clubs, special interest groups etc.	Retain minimum of 7 years after action completed, then destroy
5.2.6	Records relating to liaison between the College and service providers where the service is not provided directly by the College. For example, accommodation providers and caregivers.	Retain minimum of 5 years after action completed, then destroy
5.2.7	Records relating to the provision of counselling by a professional counsellor. Includes case files.  Note: case files may be destroyed prior to the expiry of the minimum retention period in certain circumstances e.g., agreement between counsellor and client.	Retain minimum of 7 years after action completed or until the person reaches the age of 25, whichever is longer, then destroy
5.3.1	Records relating to the provision of library borrowing and usage rights (including the imposition of fines or other penalties).	Retain minimum of 1 year after action completed, then destroy
2.1.1	Records of assessment and records of appeals of individual assessments.  Note: action completed may include escalation to internal or external formal grievance/ complaint processes.	Retain minimum of 1 year after action completed, then destroy
2.1.2	Student examination/assessment scripts or items e.g., examination papers completed by students, examination manuscripts and assignments. Includes any work submitted or completed by students for the purposes of assessment or evaluation by: examinations (written or oral), assignments, theses, field work reports, presentations, works of art, etc.	If not returned to student, retain at least until the end of the appeal period, then destroy
2.2.1	Records relating to the management of student attendance for teaching and assessment activities such as examinations, assessment activities, classes, tutorials and laboratory sessions, e.g., attendance lists, sick leave forms and medical certificates.	Retain until at least until end of appeal period, then destroy
2.3.1	Records relating to course delivery, including subject resources, material used in course delivery, and quality assurance. Includes: subject outlines, study guides, readings, self-assessment	Retain until no longer required for teaching or other purposes, then

1) GA47 Reference	2) Full Description	3) Retention / Disposal Requirement
	exercises, audio/visual teaching aides, reading lists, assignment lists, lecture notes, timetables, rosters, organising venues, teaching allocations, feedback data collection/survey forms, assessment of data/feedback on course delivery	destroy
2.3.2	Masters of examination papers.  Note: if no other course material is available these should be retained as archives (see entry 2.4.1).	Retain minimum of 15 years after superseded, then destroy
2.4.1	Final approved versions of curricula. Includes: master/authoritative set of descriptions of course requirements, prerequisites, content and outcomes, calendars, faculty handbooks and course guides; master set of approved examination papers if no other course material is available.	Required as archives
2.4.2	Records relating to the course development, review and/or approval. Includes correspondence, reference/advisory/industry groups, records of working parties and notes, and committee records.  Note: where these records are batched a careful estimation will need to be made on the likelihood all relevant courses have been superseded.	Retain minimum of 10 years after superseded, then destroy
2.4.3	Records relating to successful or unsuccessful external accreditation of courses by professional or registration bodies. Includes letter/notification of outcome of accreditation processes.	Retain minimum of 10 years after expiry of accreditation or until action completed, whichever is longer, then destroy
2.4.4	Records generated to support compliance with agreed accreditation obligations. Includes: samples of output and results; reports and portfolios created for accreditation body	Retain minimum of 5 years after action completed, then destroy
2.5.1	Records relating to the transfer of responsibilities and ownership of courses to another institution. Includes agreements.	Retain minimum of 7 years after expiry or termination of agreement, then destroy
2.5.2	Records relating to courses, assets, services and administration functions, where responsibility and/or liability has been transferred to another organisation within the NSW public sector and where records are required and where records are required to continue teaching, research,	Transfer ownership to new institution

1) GA47 Reference	2) Full Description	3) Retention / Disposal Requirement
	<p>provision of services or management of business or activity. Includes but is not limited to:</p> <p>assets; student administration; student and other services; teaching; general administration; and commercial activities and consultancy services</p>	
4.1.1	<p>Final, approved versions of by-laws and rules governing the institution.</p> <p>Note: includes final approved versions of strategic policies governing core functions such as teaching, research and admissions where these are not captured in by-laws, rules or minutes of governing bodies.</p>	Required as archives
4.1.2	<p>Records relating to the development and review of by-laws, rules and whole of institution policies and procedures. Includes final approved versions of whole of institution procedures and policies that are duplicated in by-laws and rules.</p> <p>Note: the need to refer to superseded policies and procedures for ongoing business needs should be assessed before destroying records under this class.</p>	Retain minimum of 15 years after superseded or action completed, then destroy
4.1.3	<p>Records relating to the development and review of internal policies and procedures relating to core and administrative functions. Includes manuals, guidelines etc. developed by business units to facilitate day-to-day operations.</p>	Retain until administrative or reference use ceases, then destroy
4.2.1	<p>Records relating to the conduct of elections for membership of governing or student bodies, committees, etc. Includes nominations, notices, papers, results, etc.</p>	Retain minimum of 1 year after action completed, then destroy
4.3.1	<p>Records relating to the accreditation of the institution as an education provider.</p>	Required as archives
4.3.2	<p>Records of accreditation to deliver externally accredited short or non-award courses.</p>	Retain minimum of 30 years after discontinuation of course, then destroy