



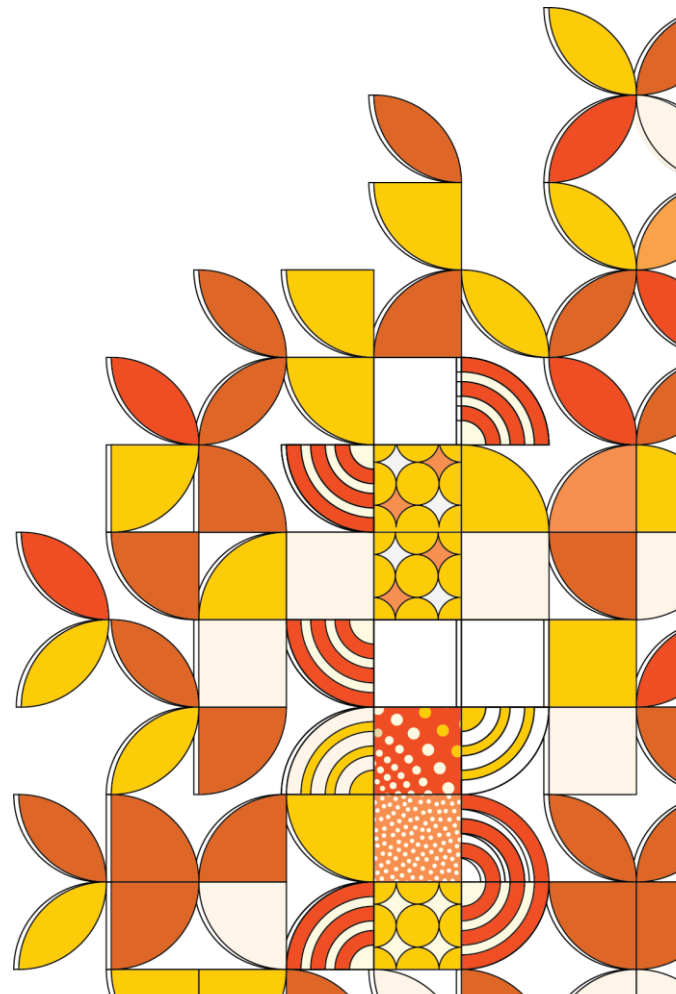
Legal entity: INSTITUTE OF HEALTH & MANAGEMENT PTY LTD.

Category: Institute of Higher Education

CRICOS Provider: 03407G | Provider ID: PRV14040

ABN: 19 155 760 437 | ACN: 155 760 437

# Records Management Policy



## SECTION 1

### Purpose

1. IHM's records provide evidence of actions and decisions and represent a vital asset to support its daily functions and operations.
2. This policy outlines the principles involved in maintaining the integrity of data and records at IHM, to ensure that records are retained, maintained, and secured in accordance with legislation to safeguard the privacy of personal and sensitive information of individuals whilst maintaining the appropriate records of the educational activities of IHM.

### Scope

3. This policy covers all personal and sensitive information relating to students and staff and all institutional records including educational, training, assessment, policy, financial, Intellectual Property, compliance, and quality documents.

### Related Documents

4. This policy is linked to the following documents:
  - a) Records Management Procedure
  - b) See also the Associated Information listed in the 'Related Internal Documents' in Section 3 below.

### Definitions

5. Refer to IHM's Glossary of Terms.

## SECTION 2

### Policy

6. IHM is committed to maintaining the security of personal and sensitive information and to safeguarding institutional and personal records. The policy is based on the following principles:
  - a) the interests of the individual and the preservation of their privacy and confidentiality are paramount.
  - b) the principle of minimal disclosure shall be applied to all areas of academic and administrative practice.
  - c) students and staff have a right to know how their personal information shall be managed, including the use, storage and disposal and disclosure of that information.
  - d) students and staff have a right to know the personal information that is held about them and to correct such information as required.
  - e) information kept shall be up-to-date and accurate, and only used only for the purposes for which it is acquired.
  - f) information shall not be disclosed to others (including parents, friends, and spouses) without written permission from the individual concerned.
  - g) student information shall not be disclosed to staff unless they are directly involved with student results and student welfare.

- h) information shall be disclosed to Federal and State authorities as required under legislation.
  - i) all student records shall be held securely and backed up at an off-site location.
  - j) the preferred method of record keeping is by electronic means.
7. IHM creates and stores data in order to:
- a) document business activities
  - b) ensure that practices are consistent by allowing staff access to prior student data and decisions made with regards to it
  - c) protect the rights of staff, students, and visitors.
  - d) ensure that IHM can demonstrate compliance with all external regulatory requirements, including the Higher Education Standards Framework (HESF) 2021 and the National Code 2018
  - e) maintain accountability for any business activities that are associated with staff, student, or other data.
8. Data integrity is a key element of decision-making and business practices, as well as accountability, transparency, and risk management at IHM. Key areas of data collection for these processes include:
- a) critical incidents
  - b) allegations of misconduct
  - c) breaches of academic or research integrity
  - d) responses to each incident, and accountability for the response
  - e) institutional student data relating to retention, progression, and performance.
9. Record keeping practices shall be consistent, secure, and in line with Australian State and Commonwealth regulatory requirements, including the Privacy Act 1988 (Cth).

### Roles & Responsibilities

10. As part of new staff induction, staff are to be made aware of their responsibilities for ensuring data integrity. These responsibilities include:
- a) adhering to the associated procedures outlined in this policy and any additional instructions received from supervisors or senior staff.
  - b) creating accurate records of IHM activities
  - c) ensuring, to the best of their ability, that all data is authentic.
  - d) updating and archiving data wherever necessary
  - e) reporting any misconduct that comes to their attention.
11. In addition to general staff responsibilities, supervisors shall ensure that they:
- a) train staff in their roles and responsibilities relating to data integrity.
  - b) oversee staff recordkeeping to maintain proper capture, management, and security of data, including staff and student records.
  - c) document procedures for capturing and preserving student and staff records and other data.
  - d) work to oversee record keeping systems, storage, and disposal, and improve data integrity practices.
  - e) maintain oversight of which staff members are authorised to access what student and staff data.

## SECTION 3

### Associated Information

<b>Related Internal Documents</b>	Records Management Procedure
<b>Related Legislation, Standards and Codes</b>	Tertiary Education and Quality Standards Agency Act 2011 Higher Education Standards Framework (Threshold Standards) 2021 – HESF Domain 7 Education Services for Overseas Students Act 2000 National Code of Practice for Providers of Education and Training to Overseas Students 2018 Higher Education Support Act 2003 Privacy Act 1988 (Cth)
<b>Date Approved</b>	09.11.2023
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<b>Date of Effect</b>	13.11.2023
<b>Date of Review</b>	01.11.2026
<b>Approval Authority</b>	Management Committee
<b>Responsibility for Implementation</b>	Chief Finance Officer, Chief Operating Officer, Registrar
<b>Document Custodian</b>	Company Secretary
<b>Responsible Department</b>	Corporate Services Department
<b>IHM DocID</b>	IHM-RMP1-1.1

### Change History

Version Control		Version 1
Change Summary	Date	Short description of the change, incl version number, changes, who considered, approved, etc.
Version 1	28/07/2023	New Policy
Version 1.1	13/11/2023	Removal of Definitions as now referring to IHM Glossary of Terms