



Records Management and Personal Information Policy and Procedure

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Government Legislation	Privacy Act 1988 Higher Education Support Act 2003 Privacy and Protection of Personal Information Act 1988 Training and Skills Development Act (2008) and associated Regulations and Guidelines Standards for Registered Training Organisations (RTOs) 2015
Responsible Officer	Finance and Administration Manager

1. Purpose

To ensure that records are retained, maintained and secured in accordance with legislation to safeguard the privacy of personal and sensitive information of individuals while maintaining appropriate records of the educational activities of the Institute.

2. Scope

The scope of this policy covers all personal and sensitive information relating to students and staff and all institutional records including educational, training, assessment, policy, financial, IP, compliance and quality documents.

3. Definitions

- **Student:** any current or former student of the IKON Institute of Australia.
- **Staff:** any current or former member of academic or support staff employed or contracted by IKON Institute of Australia.
- **Business Records:** any current or former financial, administration, governance, and all other records that are not student or staff related.

- **Personal Information:** For the purpose of this policy 'personal information' means student personal information and includes assignments, examinations, individual student results, student results collated in a list with identification by student number, and practicum, field and clinical placement details, financial details, emergency contact details. This definition is in accordance with the definitions in the *Privacy Act 1988* and the *Higher Education Support Act 2003*.

Personal information in relation to staff includes but is not limited to their personal details, contact details, payroll, qualifications, employment history, performance review and complaints.

- **Sensitive Information:** Sensitive information includes, but not limited to personal information about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, health status (either physical or emotional), disability, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, or criminal record.

4. Principles

The IKON Institute of Australia 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:

- The interests of the individual and the preservation of their privacy and confidentiality are paramount.
- The principle of minimal disclosure will be applied to all areas of academic and administrative practice.
- Students and staff have a right to know how their personal information will be managed, including the use, storage and disposal and disclosure of that information.
- Students and staff have a right to know the personal information that is held about them and to correct such information as required.
- Information kept will be up-to-date and accurate.
- Information will be used only for the purposes for which it is acquired.
- Information will not be disclosed to others (including parents, friends and spouses) without written permission from the individual concerned.
- Student information will not be disclosed to staff unless they are directly involved with student results and student welfare.
- Information will be disclosed to Federal and State authorities as required under legislation.
- All student records will be held securely and backed up at an off-site location.
- The preferred method of record keeping is by electronic means.
- All student records of achievement will be held securely for at least 30 years as required by legislation.

5. IKON Responsibilities

5.1 Maintaining records

- IKON staff will record personal information of students on enrolment which may be held in digital format or on paper records.
- IKON staff will record all student fee payments and details of refunds paid.
- IKON staff will record all changes to personal information as received and all aspects of assessment and academic achievement.
- Any manual student records will be kept securely in a lockable cabinet.

- Student records will use the Wise.NET Student Administration System. The safety features of this system are outlined in Wise.NET's *Data Safety and Security* documents.
- Electronic records will be regularly backed up (weekly) and archived. Aged files are archived and stored in a locked storeroom.
- IKON will request and hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. Manual records will be destroyed
- Every effort will be made to ensure that data held is accurate, up to date and that inaccuracies are corrected without unnecessary delay.

5.2 Data Safety and Confidentiality

- IKON will be responsible for ensuring that the IKON information network is as safe and secure as reasonably possible and that the procedures approved within this policy are implemented. The security of IKON's information systems will be reviewed regularly including regular updates of virus protection.
- User logins and passwords are required to access IKON's network. Members of staff will not, as a matter of course, be granted access to the whole management information system and will be granted access permissions in line with the role requirements.
- IKON staff will maintain privacy and will not give passwords to others.

5.3 Data Protection

- Electronic files are stored on a server with raid protection. The server is backed up onto an external storage device and routinely stored offsite.
- IKON offers a secure online payment system for all fees collected using GeoTrust. Any information collected over the Internet or taken off site will be encrypted for added security and confidentiality.
- IKON's CEO will review system capacity regularly. The CEO will also keep up to date with current legislation and guidance and will determine and take responsibility for the institute's information risk policy and risk assessment.
- IKON will comply with the requirements for the safe destruction of personal data in either paper or electronic form, when it is no longer required in a way that makes reconstruction unlikely.
- Electronic devices will be password protected to ensure data security.

5.4 Published content

- Editorial guidance from marketing will ensure that IKON's ethos is reflected within the IKON website, that information is accurate, well presented and personal security is not compromised.
- Staff and students' personal information will not be published on the website.
- Photographs that include our students will be carefully selected and will not enable individual students to be clearly identified by members of the public viewing the website. Students' full names will not be used anywhere on a website or blog, particularly in association with photographs. Direct written permission will be sought in the event photographs or testimonials that can identify students are desired for marketing purposes.

5.5 Student access to personal records

A student who wishes to apply for and receive personal information that the IKON Institute of Australia holds about them is required to:

- Make a written application to the Education Support Officer.

- The Education Support Officer shall give written notice of receipt of the application within five (5) working days of its lodgement.
- Within ten (10) working days of the lodgement of the application, the Education Support Officer shall provide the requested information in writing.

5.6 Correcting a student record

- Where a record is found to be inaccurate, a student may request in writing that a correction be made, citing details that need to be corrected and providing the correct information and any supporting information.
- The Education Support Officer will give written notice of receipt of the request for correction within five (5) working days of receiving the request.
- Within ten (10) working days of the lodgement of the notice, the Education Support Officer shall make the necessary corrections to IKON Institute of Australia records and provide the student with confirmation in writing that the requested corrections have been made.
- Where a student requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment shall be noted on the record and the student shall be advised in writing.

5.7 Staff records and access to records

- Designated IKON staff will maintain up to date records of the contact details, employment history and qualifications of all staff employed by IKON.
- Staff have a right to know the personal information that is held about them and to correct such information as required.
- Staff, as described in their position description, will have access to records of students solely for the purposes of their academic progression and personal welfare.
- Designated IKON staff shall maintain the 'Version Control Log' in all documents that are directly related to IKON's scope of registration and ensure that only the latest versions are issued or reissued to IKON Staff.

6. Grievances

Where a student has a grievance or complaint in relation to a decision made pursuant to this policy and procedures, the student may avail themselves of the institute's grievance procedures outlined in the *Student Grievance Policy*.

7. Record keeping and confidentiality

Records of course and subject reviews will be stored in order to meet auditing requirements and timeframes of the registering and accrediting agencies and the HESA 2003.

8. Cessation of Business

In the case that IKON Institute of Australia should cease its services and the discontinuation of its business the CEO shall ensure that all student records are made available to the relevant Federal and State authorities.

9. Publication

This policy is to be published for students and IKON staff in the relevant publications and on the IKON Institute of Australia website to ensure prospective students and IKON staff have up to date and accurate information.

Related Forms/Documents:

Nil

Related Policies:

S002 Student Grievance Policy

Control Log:

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Version Number	Date Approved	Description of Change	Approved by
1.0	1 April 2005	Original	Board of Governors
2.0	2 March 2009	VET FEE-HELP	Board of Governors
3.0	30 May 2011	Incorporates Higher Education Incorporates Personal Information Policy	Board of Governors
3.1	Pending approval	Included password protection of electronic devices	