

AD002 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 Standards for Registered Training Organisations (RTOs) 2015 Higher Education Threshold Standards Framework (Threshold Standards) 2015 Higher Education Support Act 2003
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 Ikon Institute.

2. Scope

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

3. Related Forms

NII

4. Related Policies

To be read in conjunction with the Glossary of Terms
S002 Student Grievance Policy and Procedure
HR004 Staff Grievance Policy and Procedures

5. Principles

- 5.1 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 Ikon employees have a right to know how their personal information will be managed, including the use, storage, disposal, and disclosure of that information;
 - students and Ikon employees 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.

6. Maintaining Records

- 6.1 Ikon employees will record personal information of students on enrolment which may be held in both digital or paper records.
- 6.2 Ikon employees will record all student payments and details of refunds paid.
- 6.3 Ikon employees will record all changes to personal information as received, and all aspects of assessment and academic achievement. Students can access this information through the portal, and may also update their personal information as required.
- 6.4 Any manual (hardcopy) student records will be kept securely in a lockable cabinet.
- 6.5 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.
- 6.6 Electronic records will be regularly backed up (weekly) and archived. Aged files are archived and stored in a locked system.
- 6.7 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 for which it was collected.

- 6.8 Every effort will be made to ensure that the data held is accurate, up-to-date and that inaccuracies are corrected without unnecessary delay.

7. Data Safety and Confidentiality

- 7.1 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.
- 7.2 User logins and passwords are required to access Ikon's network. Ikon employees will not, as a matter of course, be granted access to the entire management information system, and will be granted access permissions in-line with their role requirements.
- 7.3 Ikon employees will maintain privacy, and will not give passwords to others.

8. Data Protection

- 8.1 Electronic files are stored on a server with raid protection. The server is backed up onto an external storage device and routinely stored offsite.
- 8.2 Ikon offers a secure online payment system for all fees collected, using GeoTrust. Any information collected over the internet, or taken offsite will be encrypted for added security and confidentiality.
- 8.3 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.
- 8.4 Ikon will comply with the requirements for the safe destruction of personal data, in either paper or electronic form, when it is not longer required, in a way that makes reconstruction unlikely.
- 8.5 Electronic devices will be password protected to ensure data security.
- 8.6 In the event of a Data Breach Ikon will notify OAIC and all individuals impacted as per legislative requirements.

9. Published Content

- 9.1 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.
- 9.2 Ikon employee and students' personal information will not be published on the website.
- 9.3 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 the website or blog, particularly in association with photographs. Direct written

permission will be sought in the event that photographs or testimonials that can identify students are desired for marketing purposes.

10. Student Access to Personal Records

- 10.1 A student who wishes to apply for and receive personal information that the Ikon Institute holds about them is required to:
- make a written application to the Education Support Officer;
 - the Education Support Officer shall give written notice of the 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.

11. Correcting a Student Record

- 11.1 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.
- 11.2 The Education Support Officer will give written notice of receipt of the request for correction within five (5) working days of receiving the request.
- 11.3 Within ten (10) working days of the lodgement of the notice, the Education Support Officer shall make the necessary corrections to Ikon Institute records, and provide the student with confirmation in writing that the requested corrections have been made.
- 11.4 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.

12. Staff Records and Access to Records

- 12.1 Designated Ikon employees will maintain up-to-date records of the contact details, employment history and qualifications of all persons employed by Ikon.
- 12.2 Ikon employees have a right to know the personal information that is held about them, and to correct such information as required.
- 12.3 Ikon employees, as described in their position description, will have access to records of students solely for the purposes of their academic progression and personal welfare.
- 12.4 Designated Ikon employees shall maintain the version control of 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 employees.

13. Grievances

- 13.1 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.
- 13.2 Where an Ikon employee 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 Staff Grievance Policy.

14. Record Keeping and Confidentiality

- 14.1 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 Higher Education Support Act (HESA) 2003.

15. Cessation of Business

- 15.1 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.

16. Publication

- 16.1 This policy is to be published and provided to students, prospective students and staff on the Ikon Institute of Australia website www.lkoninstitute.edu.au to ensure that all have access to up to date and accurate information.