



Records Management Policy and Procedure

1 Scope and Purpose

The purpose of this policy is to provide a framework for the creation and management of information and to ensure that records are created, maintained and disposed of appropriately to comply with relevant legislation and business requirements. This policy applies to hard copy records, electronic records and databases.

This policy applies to all staff of Russo Business School higher education community.

2 Definitions

Archives are records that are deemed to have continuing value

Controlled Document is a reference document which, through the course of its lifecycle may be reviewed, modified and distributed several times. Examples of a controlled document include policies, procedures, datasheets, contracts, application forms and plans.

Data is the data contained in a form, document or electronic record

Document control is the process established that sets out the controls to manage records

Electronic records are information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business

Industrial disposal is the recorded and secure destruction of records. The destruction of records must be recorded and done securely.

Records management is the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

3 Policy Objectives

Russo Business School aims to ensure all the business activities are accessible for operational purposes, accountability, and compliance purposes. Russo Business School is committed to ensuring that levels of responsibility are established with regard to records management. All records are kept accurately, and all confidential records are:

- Kept securely and safeguarded
- Kept under lock and key for hard copies
- Access limited and password protected for electronic records, where required.

4 Implementation

Russo Business School will ensure that records are managed according to this policy and meet all regulatory requirements. The following principles apply:

- a. All records are true and accurate
- b. All records are accessible for the relevant business contexts
- c. All management system records are the responsibility of the personnel listed in the Retention Schedule at Appendix 1
- d. All student information is confidential and is only made available to the students themselves; to a person authorised by them; or when ordered to do so by a legal requirement.

4.1 Privacy and confidentiality

All student and staff records are subject to privacy and confidentiality requirements as generally applicable in Australian Law. A basic principle is that personal information for students or staff may not be accessed without their written consent and that individual staff and students have a right of access to their personal file.

5 Procedures

The following sections provide detailed information on the creation of records and records management procedures.

5.1 Creation of records

Records may be created for various purposes. Records should be developed using appropriate version control where applicable, particularly for policies and procedures, and other similar documents that will undergo revision from time to time.

5.1.1 Document format

Documents should be created using the appropriate format for the type of document. For example, all policies should be developed using Russo Business School's Policy Template. There may be other templates created for various business purposes.

5.1.1.1 File naming conventions

The following file naming conventions should be used:

- e. File names should not include punctuation or symbols such as commas, slashes, &, colons, or semicolons as it causes issues with some software systems
- f. Spaces may be used to separate words in a title
- g. Hyphens may be used if a word is usually hyphenated, but not to separate words
- h. Hyphens may also be used to point out another subject in the document title, such as the version number
- i. When referring to the date 2020 should be referred to in full as 2020 rather than as 20.

It is preferable:

- a. To use titles that group files together in some instances, such as Minutes. For example: Minutes Academic Board 01Sept2015; Minutes Academic Board 01Nov2015. Consider whether this would be useful when searching for files.

- b. That no names of people are used in titles; instead use a consecutive version number.

Examples of titles are as follows:

Course Outline v0.01

Records Management Policy and Procedure v1

Minutes Academic Board Meeting 010915 v0.02

5.1.1.2 Version control

Policy & Procedure Version No	Policy & Procedure Sponsor	Approval Authority	Date of Approval	Date for next review
1/2022	Name of Sponsor	Board of Directors	XX/XX/XXXX	XX/XX/XXXX

Controlled documents such as policies should include a Revision History. This should be completed by staff to keep a record of version history and approvals.

The following information should be inserted in the footer of each document, using Word’s ‘Insert Field’ functions, so that titles and page numbers are automatically updated.

- a. Title of document
- b. Page number (X of Y format).

Example: Records Management Policy and Procedure v1 Page 1 of 2

Initial drafts of a controlled document should commence with version 0.01 and continue with increments of 0.01 to reflect subsequent changes.

The final version of the controlled document will commence with a whole number, such as version number 1.0. Minor revisions will proceed with increments of 0.01, for example 1.1, 1.2 and so on. Major changes will increase by whole number increments, for example 1.0, 2.0 and so on.

5.1.1.3 Document Register

A document register shall be maintained for all controlled documents. It should include the following as a minimum:

- a. Document title
- b. Version number
- c. Document contact
- d. Date created
- e. Date revised
- f. Date of approval
- g. Approving authority
- h. Comments on history or reasons for review.

5.1.1.4 Document approval

New documents or final revised drafts of documents should be circulated to appropriate personnel or committees prior to seeking approval from the relevant approval authority. Generally, this will be the Academic Board for academic documents and the Board of Directors or Executive Management for non-academic documents.

Note: Minor changes such as grammar or spelling amendments, or updates to web links are not deemed as changes to content and are therefore exempt from the formal approval process.

Once approved, the final controlled document is distributed to all relevant personnel, students or stakeholders and uploaded to its document management system, and Russo Business School's website.

5.2 Management of records

5.2.1 Student records

5.2.1.1 Individual student records

Student files are stored in a locked filing cabinet and/or as a secure digital record with access provided only to those authorised to view them. Information examples are:

a. A student file will consist of:

- personal details
- enrolment forms
- credit application documentation, if relevant
- records of fees paid and due in relation to their course
- all correspondence and records of contact with the student
- copies of all student assessments for at least one semester after completion of the assessment items

Student assessment records

- are retained for every student initially for appeal or review, and ultimately so Russo Business School maintains the ability to re-issue the actual qualification testamur or statement of attainment

Academic records

- will be retained as per the Retention Schedule at Appendix 1. The records are to contain sufficient information for Russo Business School to reissue the qualification or statement of attainment upon request.

5.2.1.2 Completed assessment items

Completed assessments are retained as per the Retention Schedule at Appendix 1. Russo Business School disposes of completed assessments securely on the completion of each semester for compliance reasons.

5.2.1.3 Student data

Student data such as: admissions, enrolments, attrition, progression, and completions; awarding of qualifications and issuance of testamurs, and the like are retained as per the Retention Schedule at Appendix 1.

5.2.2 Staff records

All staff have a personal file (held in the Sarina Russo Group (parent company) Human Resource Department) for the storage of all essential records. Information examples are:

- a. Records of validated qualifications are maintained, together with certified copies of qualifications and a resume. Such information on qualifications and experience is updated annually.
- b. Personal records of staff are kept in either electronic format or hard copy format which is scanned to a secure server
- c. Hardcopies are disposed of securely.

5.2.3 Financial records

All Russo Business School's financial documents required by the Australian Taxation Office and other government bodies are retained by the Sarina Russo Group (parent company) Finance Department as per the Retention of Records and Authorised Disposal Schedule at Appendix 1.

5.2.4 Insurance records

The records of insurance policies are to be maintained as not lapsed:

- a. Directors and Officers Insurance
- b. Professional Indemnity
- c. Public Liability
- d. Workers Compensation as prescribed by the *Workers' Compensation and Rehabilitation (National Injury Insurance Scheme) Amendment Act 2016*
- e. Relevant building and contents insurance policies.

These records are maintained by the Sarina Russo Group (Parent company) Legal Department.

5.2.5 Security of access to records

All access to records of Russo Business School must be carried out according to the requirements of the Information Management and Security Policy and Procedure.

- a. Users who access the Institute's network or any other information resources must adhere to the guidelines in the Information Management and Security Policy.
- b. There are authentication processes for validating the identity of a person such as password authentication, biometric authentication or two-factor authentications based on the sensitivity of information
- c. Data owners should authorise sensitive data individually and ensure that annual confidentiality agreements are signed by all the authorised users.

5.2.6 External reporting requirements

There are external reporting requirements such as those for State and Commonwealth Government bodies that may require student course data records to be submitted in a format to suit their systems. Russo Business School will ensure that it:

- a. Supplies such data as required in the format determined by TEQSA
- b. Submits data to State and Commonwealth Government bodies using compliant reporting software, which dictates the data and format required for submission. The operator is to ensure that data submission has been effective.

5.3 Retention and disposal of records

Details pertaining to retention and disposal of records will be kept in a Retention of Records and Authorised Disposal Schedule, which is located at Appendix 1. Staff are to refer to the Schedule to determine the retention period for each record type. Further details for each record type may be developed as necessary.

5.3.1 Archiving records

Records are retained while files are active, before being transferred for archiving in secure storage in either a hardcopy or electronic format. Archiving will generally occur once a student or staff member leaves Russo Business School, or at such other time as the record is deemed to be no longer active as required by the Retention of Records and Authorised Disposal Schedule at Appendix 1.

5.3.2 Destruction of records

Records that are no longer required by Russo Business School and that have passed the minimum retention period as per the Retention of Records and Authorised Disposal Schedule, may be disposed of by the appropriate method. The appropriate method depends on the format and security classification of records and the methods available. The destruction of records should take place as soon as possible after the endorsement has been given. Paper and physical records can be destroyed in 3 ways - shredding, pulping and burning. Digital records and storage media can be destroyed in 4 ways - overwriting, purging, degaussing and physical destruction. Industrial disposal can be undertaken in-house and does not necessarily require the services of a commercial destruction service.

5.3.3 Industrial disposal responsibility

Heads of organisational units are responsible for ensuring records are disposed of in accordance with authorised disposal schedules, and for certification of entries made in the Register of Records Destroyed.

6 Related documents

The following policies and procedures are related to this policy:

- a. Admissions Policy and Procedure
- b. Information Management and Security Policy
- c. Privacy Policy and Procedure
- d. Staff Development and Scholarship Policy and Procedure
- e. SRG Human Resource Grievance and Disputes resolution Policy and Procedure
- f. Staff Recruitment and Performance Policy and Procedure
- g. Student Complaints and Appeals Policy and Procedure
- h. Service Level Agreement Russo Business School and Sarina Russo Job Access

7 Review

Three years from commencement.

8 Accountabilities

The Board of Directors is responsible for review and approval of this policy.

The policy is to be implemented via induction and training of staff and distribution to students and the Institute's higher education community via the website and other publications.

Delegated Authority	Delegation
Governance	
Board of Directors	Refer to the Terms of Reference
Executives	
Chief Executive Officer	Relevant to Accountability Statement
Executive Dean	Relevant to Accountability Statement
Management	
Dean of Studies	Relevant to Accountability Statement
Manager, Operations and Standards	Relevant to Accountability Statement

9 Revision History

Policy & Procedure Version No	Policy & Procedure Sponsor	Approval Authority	Date of Approval	Date for next review
1/2022	Chief Operating Officer	Board of Directors	13/07/2022	13/07/2024

Appendix 1 – Retention of Records and Authorised Disposal Schedule

This Retention of Records and Authorised Disposal Schedule outlines the period of time that key records will be kept and the person responsible for maintaining the records and authorising disposal.

Type of Record	Retention Period	Person Responsible
Governance Records	Permanent record	Senior Legal Counsel, Sarina Russo Group,
Legal Records	Minimum of 7 years, as required by ASIC. Some legal records should be kept as a permanent record.	Senior Legal Counsel, Sarina Russo Group,
Student Records	Student Files – Minimum of 20 years in digital format, after the student graduates or leaves	CEO
Student Assessments	Student Assessments and Exam Papers - 6 months after the end of the relevant term Assessment Grades – Minimum of 10 years in digital format	Dean of Studies
Student Data	Student Data such as: admissions, enrolments, attrition, progression, and completions; awarding of qualifications and issuance of testamurs, and the like	CEO
Human Resource Files and Employee Records	Minimum of 7 years, as required by the Fair Work Ombudsman	National Human Resources Manager, Sarina Russo Group,
Research Publications	Minimum of 5 years from date of publication as recommended by The Australian Code for the Responsible Conduct of Research	Executive Dean
Financial Records	Minimum of 5 years after the records are created, as required by the Australian Taxation Office	Chief Financial Officer, Sarina Russo Group
Business Asset Records	Minimum of 5 years after the year when the Capital Gains Tax event happened, as required by the Australian Taxation Office	Chief Financial Officer, Sarina Russo Group

Policies and Procedures	Minimum of 1 year in digital format, after version has been made obsolete	CEO, Russo Business School
Regulatory Authority Documents/Applications	Minimum of 10 years in digital format, after the documents/application have been submitted	CEO, Russo Business School
Other Records: eg complaints	As determined by the CEO	CEO, Russo Business School