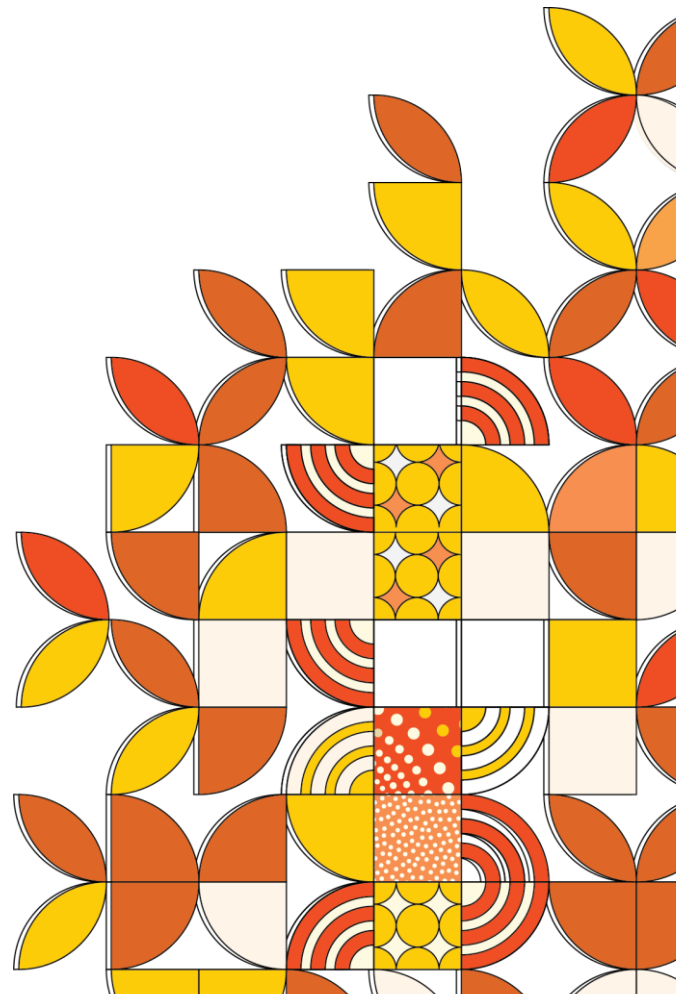


Records Management Procedure



SECTION 1

Purpose

1. IHMs records provide evidence of actions and decisions and represent a vital asset to support its daily functions and operations.
2. This procedure captures what is 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 procedure 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 Policy
 - 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

Procedure

6. Maintaining Records

- 6.1 Staff shall record personal information of students on enrolment which may be held in digital format or on paper records.
- 6.2 Staff shall record all changes to personal information as received and all aspects of assessment and academic achievement, and all student fee payments and details of any refunds paid.
- 6.3 Any manual student records shall be kept securely in a lockable cabinet.
- 6.4 All electronic student records shall use IHMs Student Administration System.
- 6.5 Electronic records shall be regularly backed up and archived. Aged files are to be archived and stored in secure facilities.
- 6.6 IHM shall request and hold the minimum personal data necessary to enable it to perform its function and it shall not hold it for longer than necessary than the purpose for which it was collected.

6.7 IHM shall retain all written agreements (i.e., student contracts) as well as receipts of payment made by students under the written agreement for at least 2 years after the person ceases to be an accepted student.

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

7. Data Security and Storage

7.1 All data within IHM falls into one of the following categories:

- a) public data
- b) internal data
- c) internal protected data
- d) internal restricted data

7.2 All data shall be secured in order to:

- a) ensure integrity and authenticity
- b) prevent access except by authorised parties
- c) prevent removal or alteration of data

7.3 To enable the issuance of replacement testamurs and academic transcripts, student records of achievement shall be held securely indefinitely or as otherwise as required by legislation.

7.4 Records of course and subject reviews shall be stored to meet auditing requirements and timeframes of the registering and accrediting agencies and the Higher Education Support Act 2003.

7.5 All other data shall be stored for seven years, at which point it may either be archived or disposed of. If records and data are deemed to be of future value to IHM, either to inform decisions or demonstrate compliance, they are to be archived.

7.6 All internal data is to be stored with security measures appropriate to its category of confidentiality. All internal physical data shall be stored in locked metal filing cabinets, while all internal digital data is to be stored in a password-protected database that is regularly backed up and access granted only to selected authorised personnel.

7.7 The categories of data are defined as follows:

- a) **Public Data** - includes but is not limited to course information, enrolment dates, and IHM's contact details. Public access data is to be freely available to both members of the IHM community, and the general public. The Marketing Manager in liaison with the Quality Assurance Manager are responsible for ensuring that all public data is up-to-date and publicly accessible.

- b) **Internal Data** - available to administrative staff for use and includes staff policies, meeting minutes, and other work-related documents. The CEO is responsible for ensuring that all internal data is only available to relevant staff members.
- c) **Internal Protected Data** - only accessible by selected authorised staff. Internal protected data includes student assessment outcomes, student examinations, and academic staff research. The Corporate Board and Dean (where the data relates to student information) are responsible for ensuring that adequate security measures are in place to prevent unauthorised parties from accessing IHM's internal protected data.
- d) **Internal Restricted Data** - includes but isn't limited to formal complaints and allegations of misconduct, contracts and commercial-in-confidence records, critical incident reports, records of alleged breaches of academic or research integrity, records of responses to the aforementioned instances, as well as who is responsible for the responses. Information that is classified as internal restricted data is to be treated with the utmost confidentiality, with access limited to staff at the highest levels of operations. The Corporate Board and the Dean (if the data relates to student information) are responsible for implementing the necessary security measures to prevent unauthorised access.

8 Data Safety and Confidentiality

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

9 Student Records

- 9.1 Student records are a critically important category of sensitive data that IHM keeps. This involves records such as:
 - a) student contact details
 - b) biographical information, including date of birth
 - c) applications and signed agreements (i.e., Offer Acceptance)
 - d) finance information and receipts of payments made
 - e) visa information (if applicable)
 - f) grades and progression
 - g) completions and award of qualifications

- h) complaints and appeals
- i) instances of misconduct (including allegations)
- j) breaches of academic or research integrity
- k) critical incidents relating to the student

9.2 Student records are created and kept for the purposes of:

- a) various enrolment, academic, and administrative processes
- b) course development
- c) improvement of operations and processes such as the complaints and appeals channels, admissions, and support services
- d) ensuring that the rights of all IHM staff, students, and visitors are protected
- e) ensuring IHM is held accountable for any business activities that are affiliated with student records.

9.3 A copy of testamurs, records of results, academic transcripts and statements of attainment shall be electronically kept in the student's academic file.

9.4 All student information is to be treated as digital internal protected or restricted data depending on its nature and is to be protected in accordance with the level of security and access restrictions defined above. Information may also be released in the following extenuating circumstances:

- a) a parent or legal guardian of a student under the age of 18 provides a written request for access to the information.
- b) IHM receives a judicial order requiring access to the information

10 Data Access

10.1 Staff are authorised to access data based on their position in IHM. Internal data is not to be disclosed by authorised students and staff to unauthorised parties.

10.2 If a student has a query regarding authorisation for access to information, they should consult the Student Experience Team.

10.3 If a staff member has a query regarding authorisation for access to information, they should consult their supervisor.

10.4 If a staff member needs to be granted increased clearance to access records or data (such as when a staff member is appointed to a more senior role), the request shall have the necessary sign-off in order for the request to be granted.

10.5 All members of the IHM community are expected to comply with the level of access they are granted and to report any breaches they witness or engage in. Any breaches are to be reported to the Quality Assurance Manager.

11 Updating Data

11.1 All data held by IHM is expected to be accurate and up to date.

11.2 All staff and students at IHM are required to notify administration staff if the need for updating data comes to their attention.

12 Published Content

12.1 Editorial guidance from marketing shall ensure that IHM's ethos is reflected on the IHM website, and that information is accurate and personal security is not compromised.

12.2 Staff and students' personal information shall not be published on the website.

12.3 Photographs that include IHM students shall be carefully selected and shall not enable individual students to be clearly identified by members of the public viewing the website. Students' full names shall not be used anywhere on a website or blog, particularly in association with photographs. In the event photographs or testimonials that can identify students are desired for marketing purposes, direct written permission shall be sought from the student.

13 Student Access to Personal Records

13.1 A student who wishes to apply for and receive personal information that the IHM holds about them is required to:

- a) make a written application to the Registrar.
- b) the Registrar shall give written notice of receipt of the application within five (5) working days of its lodgment.
- c) within ten (10) working days of the lodgment of the application, the Registrar shall provide the requested information in writing.

14 Correcting a Student Record

14.1 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.

14.2 The Registrar shall give written notice of receipt of the request for correction within five (5) working days of receiving the request.

14.3 Within ten (10) working days of the lodgment of the notice, the Registrar shall make the necessary corrections to IHM records and provide the student with confirmation in writing that the requested corrections have been made.

14.4 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.

15 Staff Records and Access to Records

15.1 Designated IHM staff shall maintain up to date records of the contact details, employment history and qualifications of all staff employed by IHM.

15.2 Staff have a right to know the personal information that is held about them and to correct such information as required.

15.3 Staff, as described in their position description, shall have access to records solely for the purposes of their job.

16 Disposing of Data

16.1 Data is to be disposed of confidentially and the reason for disposal to be recorded. Records shall not be disposed of if:

- a) they have been active in the last 6 years
- b) there are current tasks or procedures that require their use
- c) they have been archived

16.2 In order to dispose of documents containing student information, specific procedure shall be followed:

- a) the document is to be verified to determine it is a copy or if it is the original document
- b) if the document is an original document, its content shall be identified and assessed by the appropriate authority and its relevance determined
- c) if the document is determined to no longer be of relevance, a submission to the Board of Directors regarding the disposal of the document is to be made and upon approval, the document disposed of in an appropriate manner that ensures the confidentiality of student information is maintained.
- d) reasons explaining why the document was disposed of to be archived.

17 Breaches

17.1 Breaches of this policy represent a major risk to IHM and are to be responded to with utmost seriousness. Disciplinary action may be taken against any member of the IHM community who breaches or attempts to breach this policy. Referral to law enforcement will occur if policy breaches result in financial loss for IHM or compromises the privacy of students and staff.

17.2 For any suspected breach of this policy, a full investigation and hearing may be undertaken. The information collected during this process shall be used by the Corporate Board to plan preventative measures for future breaches of data integrity.

17.3 All breaches are to be recorded in the Compliance Register.

18 Grievances

18.1 Where a student has a grievance or complaint in relation to a decision made pursuant to this policy, they may avail themselves of IHM's grievance procedures outlined in the Student Complaints and Grievances Policy.

18.2 Where a staff member has a grievance or complaint in relation to a decision made pursuant to this policy, they should contact their immediate supervisor or the HR Manager.

19 Cessation of Business

19.1 In the case that IHM 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.

20 Publication

20.1 This policy shall be published in the Policy and Procedures section of the IHM website, and the student and staff policy libraries.

SECTION 3

Associated Information

Related Internal Documents	Records Management Policy
Related Legislation, Standards and Codes	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)
Date Approved	09.11.2023
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Responsibility for Implementation	Corporate Services Department
Responsible Department	Corporate Services Department
Document Custodian	Company Secretary
Doc ID	IHM-RMP2- 1.1

Change History

Version Control		Version 1.1
Change Summary	Date	Short description of the change, including 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 Explicit mention under Maintaining Records of retaining all written agreements and receipts of payments made by students for at least 2 years are they cease to be a student (as per Standard 3.6 of the National Code 2018).
Version 1.1	25/02/2025	Updated the IHM logo powered by ASU and E&E logo

