



# Records Management, Retention and Disposal Policy

## **1 Purpose**

- 1.1 This Records Management, Retention and Disposal Policy sets out Western Sydney University International College's (WSUIC) approach relating to the management, retention and disposal of records and data.
- 1.2 WSUIC staff are expected to understand how to handle records and documents and to understand record retention and disposal guidelines. This Policy has been prepared in accordance with all relevant legislative requirements, protocols and principles. It therefore sets out how WSUIC complies with relevant legal standards and regulations.

## **2. Scope**

- 2.1 WSUIC collects, stores, processes, transfers and disposes of a range of personal data. This Policy applies to all data collection across all facets of WSUIC's operations inclusive of:
  - 2.1.1 Services and support
  - 2.1.2 Marketing and recruitment operations
  - 2.1.3 Information Technology (IT)
  - 2.1.4 Human Resources (HR)
  - 2.1.5 Finance
  - 2.1.6 Risk and Compliance
  - 2.1.7 Learning and teaching process
  - 2.1.8 Management of relationships with our suppliers
  - 2.1.9 University partner (i.e. Western Sydney University [WSU])
- 2.2 This Policy covers collection of information from students and staff, corporate, financial and workforce information where one or more of the following conditions prevail:
  - 2.2.1 Data collection is used to meet strategic business, operational or legislative requirements
  - 2.2.2 Government authorities (e.g. immigration and border agencies) have a need for the information
  - 2.2.3 The data collection contains personal information
  - 2.2.4 The data is collected as part of reporting to government, regulatory authorities or professional organisations



### **3. Definitions**

*“Record”*

A document or other data that is regarded as complete and unchangeable. It may exist as paper, as a scanned image or electronically.

*“Document”*

This means information stored on paper, as a scanned image, or electronically, that may be subject to revision.

*“WSUIC record”*

This means means any recorded information in any format (e.g. electronic, paper, photographic, scanned) created or received by staff of WSUIC in the course of conducting their normal daily duties and responsibilities.

*“ISO 15489 (BS ISO 15489-1:2001)”*

The international standard on records management.

*“Records management”*

This addresses the lifecycle of records, i.e., the period of time that records are in the custody of the organisation. The lifecycle usually consists of three stages:

1. Creation or receipt
2. Maintenance and use\*
3. Disposition

\*The tools for maintaining and using records include:

- File plans
- Indexes
- Controlled vocabularies
- Taxonomies
- Data dictionaries
- Access and security procedures

*“Document management”*

The process whereby an organisation is able to manage their documents in an electronic format through a system such as a controlled document management system (CDMS). Document Management includes the ability to restrict access to certain documents or groups of documents to only authorised users. Along with security controls, these technologies enable users to be granted different levels of access.



#### **4. Policy Statement**

- 4.1 WSUIC operates in an environment in which the importance of managing a vast array of information, in an increasingly regulated operating environment, has become a business critical priority.
- 4.2 The role of regulators such as the Tertiary Education Quality and Standards Agency (TEQSA), in accordance with the Privacy Act 1998, has increased along with the volume of information being managed. As a result, the purpose and primary objectives of this policy are to facilitate and protect effective:
  - 4.2.1 Business practice
  - 4.2.2 Regulatory compliance
  - 4.2.3 Management of WSUIC's information assets
  - 4.2.4 Current practice in records management
  - 4.2.5 Decision making support and intelligence
- 4.3 WSUIC predominately utilises electronic means for capturing and storing information to support its business processes and for transacting its business.
- 4.4 WSUIC's strategy is to utilise, as far as possible, technological solutions for the management of records, in order to meet record keeping compliance obligations, enhance operational efficiency, better manage risk, support accountability and maintain corporate memory.
- 4.5 WSUIC creates, stores, manages and maintains full and accurate records of its activities.
- 4.6 All areas of WSUIC's operations must keep records in accordance with this policy, on matters such as recruitment, admission, learning and teaching, student and staff engagement, administrative operations e.g. finance, IT, health and safety, copyright and all related commercial activities.
- 4.7 WSUIC uses records to:
  - 4.7.1 Underpin efficient and effective operations
  - 4.7.2 Support accountability, regulatory compliance and management of risk
  - 4.7.3 Preserve its corporate memory to reduce reliance on human memory and manage the risk of staff movement
- 4.8 WSUIC takes a whole-of-enterprise approach to the management of information and records and therefore all staff are responsible for:
  - 4.8.1 Creating, capturing, managing and disposing of records as part of their work related duties
  - 4.8.2 Being aware of their responsibilities for protecting personal and confidential information when creating, sharing, accessing, storing and disposing of records
  - 4.8.3 Completing the relevant record-keeping induction and training modules



**5. Underlying Principles**

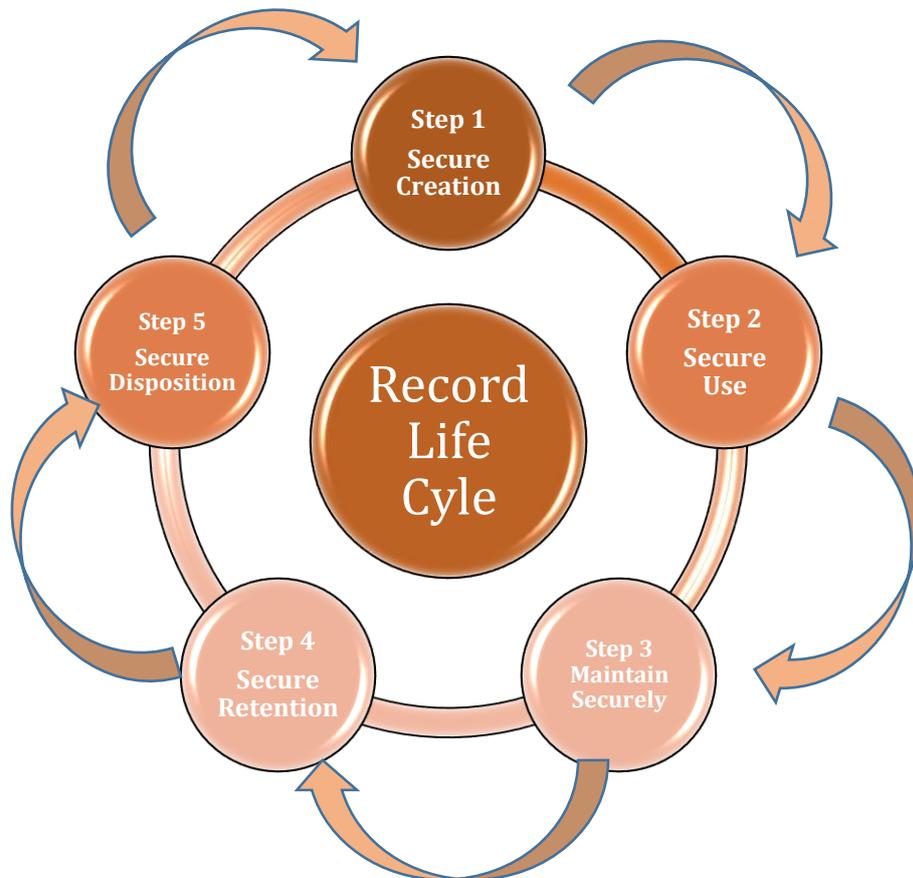
- 5.1 The processes involved in gathering, managing and using information underpin successful business operations.
- 5.2 Managing records efficiently supports compliance and accountability.
- 5.3 Each record has a lifecycle that needs to be monitored and audited regularly.
- 5.4 An efficient records management process ensures that decisions are supported with relevant information.
- 5.5 Comprehensive records are required for business transparency, legislative compliance, accountability and cultural purposes.
- 5.6 Efficient records management and comprehensive records are important in effective governance.
- 5.7 Effective and efficient records management is critical in order to assure all stakeholders that their privacy is secure and protected (see Australian Privacy Principle 11 'security of personal information').
- 5.8 Records are different from documents.
- 5.9 Records cannot be modified or deleted except in controlled circumstances, they have retention controls and they are arranged in a structure.
- 5.10 Document management applies specifically to the management of discreet documents and images throughout their lifecycle; typical functionality includes acquisition, organisation, versioning, access control, and archiving.
- 5.11 Content management focuses on the management of the data within a document, typically a web document.

**6. Records Management Lifecycle (see Figure 1)**

- 6.1 WSUIC has implemented the Information Lifecycle Management (ILM) approach to the management of information in storage systems that include electronic devices and systems.
- 6.2 Managing information through the ILM approach enables WSUIC to monitor and effectively manage its strategic and operational resources and its regulatory compliance obligations.
- 6.3 WSUIC regards the data collection phase as the most critical phase because in managing this phase appropriately, the potential to collect inadequate and/or excessive data that is not fit for purpose intended is reduced.
- 6.4 Data is collected and used (step 1: secure creation and step 2: secure use) in an ethical manner taking into consideration the rights and privacy of individual data subjects (e.g. students).



- 6.5 Consent is obtained from individual data subjects when collecting their personal information.
- 6.6 The integrity of the data collected is preserved, protected, stored and disposed in a physical and/or secure environment (step 3: maintain securely, step 4: secure retention and step 5: secure disposition).



**Figure 1: Five Steps to Managing Records and Information Lifecycle**



## **7. Retention, Maintenance, Access and Disposal**

- 7.1 WSUIC adheres to the Navitas Retention and Disposal Schedule (Appendix A), which was formulated to align with the Australian Privacy Act 1988 (Registered 25 October 2016).
- 7.2 The Retention and Disposal Schedule outlines many different types of records, which span the entire operations of WSUIC. The schedule further itemises the length of time that the record(s) will be stored before disposal.
- 7.3 Records must be organised and managed to preserve their context and ease of retrieval.
- 7.4 Records must be maintained on WSUIC, Navitas and/or Western Sydney University systems or infrastructure that is capable of meeting records management standards and legislative requirements, particularly those related to privacy and security. The storage of records is detailed in Section 8 below.
- 7.5 Records must be retained in accordance with the approved Retention and Disposal Schedule (Appendix A).
- 7.6 All records must be disposed of in a manner that protects the security and preserves the integrity of Personal Information contained in the document/s.
- 7.7 Records must be destroyed at the date specified in the Retention and Disposal Schedule (Appendix A) using secure and permanent methods unless there is a:
  - 7.7.1 Pending or anticipated legal action or business use
  - 7.7.2 Current hold or freeze on destruction issued by the WSUIC Quality and Compliance Manager
- 7.8 Permanent value records are managed in accordance with the Retention and Disposal Schedule (Appendix A) and security requirements for preservation and access.
- 7.9 Records are made available in accordance with legislation and regulatory compliance obligations and within the constraints of security, confidentiality, privacy and archival access conditions as set out in the Retention and Disposal Schedule (Appendix A).

## **8. Storage**

### **8.1 Records must be stored in conditions suitable to the:**

- 8.1.1 Longevity of the record in accord with legislation and WSUIC policy
- 8.1.2 Nature of the record content (e.g. personal, confidential or sensitive information)
- 8.1.3 Format of the record or the medium it is retained/stored on



## **8.2 On-site Records**

- 8.2.1 WSUIC maintains a range of physical records including:
  - 8.2.1 Active student files for all students who are currently enrolled
  - 8.2.2 Inactive student files for the previous term
  - 8.2.3 Active and inactive student files for future terms
  - 8.2.4 Current HR and staff personnel files (note that some of these are maintained by Navitas HR)
  - 8.2.5 Current administrative records
  - 8.2.6 Financial records (note that some of these are maintained by Navitas Finance Share Services)
  - 8.2.7 Internal Audit and Compliance records (note that some of these are maintained by Navitas Finance Shared Services and Group Internal Audit and Risk Management)
  - 8.2.8 Regulatory reports
- 8.2.2 Once records are deemed to be finalised, they may be moved to a secure off-site storage facility.

## **8.3 Off-site Records (Hard Copy)**

- 8.3.1 When deciding to move records off-site, the responsible operational area will consider issues such as security, cost, space and level of accessibility required. Some operational areas will systematically move records to secure off-site storage facilities, e.g. Student Services moving graduate student files.
- 8.3.2 The transfer of paper documents to electronic documents through secure scanning processes is also an option for storage.

## **8.4 Electronic Records**

- 8.4.1 WSUIC currently stores all electronic copies of documents on appropriate hardware. The primary drive is generally categorised by operational area. Files that are deemed to have been superseded or temporary are either archived in accordance with the Retention and Disposal Schedule (Appendix A) or disposed of under secure conditions.
- 8.4.2 WSUIC in collaboration with Navitas IT, stores all data in accordance with the specifications as set out in the Information Classification Policy.
- 8.4.3 A system must be assessed by Navitas IT for compliance with records standards before it is implemented or before records are migrated to or from the system. A major change to an existing system must also be assessed by Navitas IT for such compliance through a defined procedure.



## **9. Security**

- 9.1 WSUIC via Navitas IT, focuses security of data and its storage around the stringency of prevailing data protection legislation and regulation.
- 9.2 Storage security includes the security of devices and media, the security of management activities related to the devices and media, the security of applications and services and security relevant to end-users during the lifetime of devices and media and after the end of use. (Ref. [ISO/IEC 27040:2015\(E\)](#))
- 9.3 Electronic data is backed-up daily by Navitas IT.

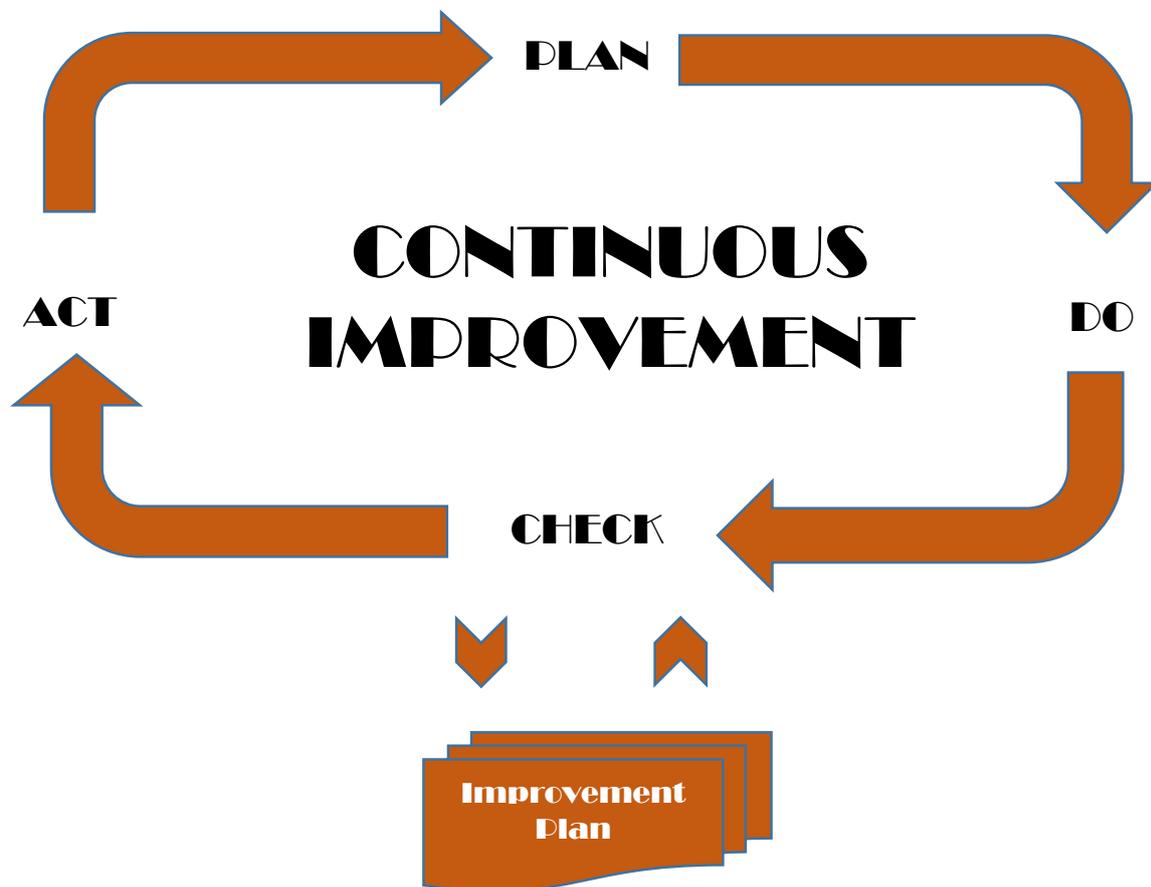
## **10. Privacy**

WSUIC's Privacy Policy is reflective of the regulatory requirements as stipulated in the TEQSA Act 2011, Higher Education Standards Framework (HESF) 2015, ESOS Act 2000, ESOS National Code 2018 and the Privacy Act 1988.

For more detail, refer to the WSUIC Privacy Policy.

## **11. Continuous Improvement**

- 11.1 This Policy and its implementation is predicated upon the plan-do-check-act (PDCA) continuous improvement strategy that has been adopted by WSUIC. The improvement cycle of PDCA (see Figure 2) is what drives the continuous improvement process in the management of information in WSUIC.
- 11.2 Continuous improvement in the management of information and information management systems is fundamental to WSUIC's ability to remain compliant with its regulatory obligations particularly with respect to the security of personal information and corporate reporting requirements.
- 11.3 The use of a continuous improvement approach facilitates effective decision making, particularly with respect to decisions that impact the effective management and control of personal information and commercial-in-confidence data.
- 11.4 WSUIC is able to continue to enhance its ability to better manage information collection, use, storage, transfer and disposition through the collation of data (PLAN), comparative analysis (DO), regular self-evaluation (CHECK) and reflective practices (ACT).



**Figure 2: PDCA Continuous Improvement Cycle**

## 12. Responsibilities

- 12.1 Each WSUIC operational unit (i.e. Academic Team, Student Services, Marketing and Admissions) must:
- 12.1.1 Comply with relevant guidelines on records management
  - 12.1.2 Ensure full and accurate records are made for activities where records are required to be kept
  - 12.1.3 Determine appropriate retention periods and restrictions in accordance with Retention and Disposal Schedule (Appendix A).
  - 12.1.4 Maintain security for records stored in office areas and electronically.



12.2 All staff must:

- 12.2.1 Create full and accurate records of all WSUIC activities for which they are responsible and of all substantive or formal decisions they take in the service of WSUIC
- 12.2.2 Store records in the designated location and/or system as approved by WSUIC management
- 12.2.3 Protect sensitive records in their custody from unauthorised access
- 12.2.4 Not destroy records without authorisation from their manager
- 12.2.5 Not maintain individual or separate files or recordkeeping systems or unmanaged electronic records except as otherwise authorised by WSUIC management

**13. Quality and Compliance**

- 13.1 This policy is reviewed periodically (at a minimum every two years) to ensure regulatory compliance, operational currency, the identification of continuous improvement opportunities and risk identification and mitigation. This review is reflected in WSUIC's Quality Management Framework and Risk Management Framework.
- 13.2 This policy will be available on the WSUIC website for students and the WSUIC SharePoint site for staff access.
- 13.3 Emails will be issued to all staff to inform and update them on any changes to the policy and/or procedures and guidelines.
- 13.4 New staff will receive policy information during the induction process where it relates to their position.

**14. Related Forms and Documents**

N/A

**15. Related Policies, Procedures, Guidelines and Legislation**

- POL 37 WSUIC Privacy Policy
- POL 21 WSUIC Staff Code of Conduct
- Navitas Records Management, Retention and Disposal Policy
- [Western Sydney Records and Archives Management Policy](#)



- [State Records Act 1998 \(NSW\)](#),
- [Government Information \(Public Access\) Act 2009 \(NSW\)](#),
- [Privacy and Personal Information Protection Act 1998 \(NSW\)](#).
- GA 47 General retention and disposal authority: higher and further education records
- Higher Education Standards Framework 2015 Domain 1 Student Participation and Attainment clause 1.5 Qualifications and Certification and Domain 7 Representation, information and information management clause 7 Information Management
- National Code 2018 Standard 3 Formalisation of enrolment and written agreements clause 3.6, Standard 5 Younger overseas students clause 5.3.5, Standard 7 Overseas student transfers clause 7.7
- National Standards for Foundation Programs Explanatory Guide clause 2.5 and clause 6.3
- ESOS Act 2000 Section 21

### Approval and Amendment History

<b>Approval Authority:</b>	Western Sydney University International College Board of Directors
<b>Policy Owners:</b>	Executive
<b>Approval Date:</b>	22 March 2019
<b>Date for Next Review:</b>	22 March 2021

Amendments		
Revision Date	Version	Summary of changes
21/10/2016	1	New policy developed
21/12/2016	1.1	Removal of Legislative references from the beginning of the document and placement as Appendix A at the rear of the document; addition of Clause 3 (Definitions ) and Clause 11 (Related forms and Documents) for consistency of format to match other Policy documents and renumbering of clauses to address these additions; addition of clause 1.2 to add direction to purpose statement; added legislation links to Clause 10.



<b>Amendments</b>		
<b>Revision Date</b>	<b>Version</b>	<b>Summary of changes</b>
22/03/2019	2.0	<p>Removed reference to GDA 23 – this has been superseded by GA 47</p> <p>Remove reference to MAZE and Callista (?)</p> <p>Formatting changes throughout the document</p> <p>Reworded Policy Statement</p> <p>Updated Retention &amp; Disposal to refer to GA 47 not GDA 23; included adherence to National Code 2018, HESF 2015, National Standards for FP</p> <p>Restructured Electronic Records to enumerate electronic records that are collected and stored by WSUIC</p> <p>Added Responsibilities based on WSU Records Management Policy</p> <p>Replaced Quality and Compliance with the new generic statement</p> <p>Replaced Approval and Amendment History with current format</p> <p>Updated related guidelines and regulations</p> <p>Replaced Appendix A with list of key records that must be collected and retained by WSUIC as per National Code 2018, HESF 2015, National Standards for FP</p>



## APPENDIX A

### Records Retention and Disposal Schedule

This Retention and Disposal schedule has been developed by Navitas in accordance with the following Acts relating to records management inclusive of retention and disposition:

- Student Assistance Act 1973 (Registered 03 January 2017)  
<https://www.legislation.gov.au/Details/C2017C00005>
- Student Identifiers Act 2014 (Registered 06 January 2017)  
<https://www.legislation.gov.au/Details/C2017C00038>
- Student Loans (Overseas Debtors Repayment Levy) Act 2015  
<https://www.legislation.gov.au/Details/C2015A00155>
- Tertiary Education Quality and Standards Agency Act 2011 (Registered 25 July 2016)  
<https://www.legislation.gov.au/Details/C2016C00888>  
[Tertiary Education Quality and Standards Agency \(Consequential Amendments and Transitional Provisions\) Act 2011](https://www.legislation.gov.au/Details/C2011A00074)  
<https://www.legislation.gov.au/Details/C2011A00074>
- Education Services for Overseas Students (Registration Charges) Act 1997  
<https://www.legislation.gov.au/Details/C2016C00773>
- Education Services for Overseas Students Act 2000 (registered 21 October 2016)  
<https://www.legislation.gov.au/Details/C2016C00935>
- Education Services for Overseas Students (TPS Levies) Act 2012 (Registered 11 July 2016)  
<https://www.legislation.gov.au/Details/C2016C00779>
- Competition and Consumer Act 2010 (Registered 03 March 2017)  
<https://www.legislation.gov.au/Details/C2017C00062>

#### ***Retention & Disposal Schedule by Record Type***

Description of Records	Status	Disposal Action
<b>External Relations</b>		
<b>Alumni</b>		
Alumni records including register of alumni and member details	Permanent	Retain permanently
<b>Liaison</b>		
Agreements to establish relationships with external organisations (dated)	Temporary	✓ Retain for seven (7) years after expiry or cancellation ( <u>not signed under seal</u> )



Description of Records	Status	Disposal Action
		✓ Retain for 12 years after expiry or cancellation ( <u>signed under seal</u> )
Agreements to establish relationships with external organisations (undated)	Temporary	Retain for 25 years from date registered
<b>Student Recruitment</b>		
Records relating to appointment of external advertising and/or recruitment agencies or representatives and the agreements relating to agents or representatives	Temporary	Retain for seven (7) years after appointment ceases or agreement lapses
<b>External Visits</b>		
Records relating to visits from external entities to the Company premises	Temporary	Retain for one (1) year after last action

Description of Records	Status	Disposal Action
<b>Financial Management</b>		
<b>Trust Fund Management</b>		
Establishment of perpetual Trusts and Trusts	Permanent	Retain permanently
Establishment – other Trusts including legal documents defining the terms of the Trust and records relating to finalisation of the Trust	Temporary	Retain for 20 years after cessation of Trust and disbursement of all assets
<b>Trust Fund Maintenance</b>		
Trust fund maintenance and transaction reports, including: <ul style="list-style-type: none"> <li>✓ Periodic reports</li> <li>✓ Batching records</li> <li>✓ Incorrect calculations reports</li> <li>✓ Processing/reporting request form</li> <li>✓ Processing/updates or file maintenance run lists</li> <li>✓ Trial balances</li> <li>✓ Stores and materials daily/trail/current balances and balance comparison</li> </ul>	Temporary	Retain for 10 years after last action



Description of Records	Status	Disposal Action
<b>Human Resource Management</b>		
<b>Awards and Recognition</b>		
Establishment of performance excellence awards	Temporary	Retain for five (5) years after award is no longer offered
<b>Personnel Files</b>		
Senior staff or significant staff (e.g. method of earning dismissal extraordinary, significant notoriety in their discipline/industry or media)	Permanent	Retain permanently
Non-senior staff	Temporary	Retain for 70 years after date of birth AND seven (7) years after date of separation
<b>Selection and Recruitment</b>		
Senior Staff Positions – recruitment process documentation, unsuccessful candidates and successful candidates that do not commence	Permanent	Retain permanently
Other Staff Positions – recruitment process documentation, unsuccessful candidates and successful candidates that do not commence	Temporary	Retain for one (1) year after appeal period expires
<b>Staff Exchanges/Secondments</b>		
Records relating to arrangements for staff exchanges with other entities	Temporary	Retain for two (2) years after arrangement expires
<b>Study or Professional Development Leave</b>		
Applications for study or professional development leave – successful	Temporary	Retain for seven (7) years after last action
Applications for study or professional development leave – unsuccessful	Temporary	Temporary Retain for two (2) years after last action



Description of Records	Status	Disposal Action
<b>Publishing</b>		
<b>Policy</b>		
Final version of a policy	Permanent	Retain permanently
Policy – working papers and drafts	Temporary	Retain until Policy is superseded
<b>Intellectual Property</b>		
Administration of intellectual property. Includes internal and external correspondence related to intellectual property management.	Temporary	Retain for five (5) years after last action
<b>Intellectual Property</b>		
Records relating to disputes and/or infringements concerning intellectual property	Temporary	Retain for 10 years after last action



Description of Records	Status	Disposal Action
<b>Student Administration</b>		
<b>Admission</b>		
Successful applications for admission – includes:  <ul style="list-style-type: none"> <li>✓ Offer letters</li> <li>✓ Applications</li> <li>✓ Supporting documents</li> <li>✓ Immigration clearances (Confirmation of Enrolment)</li> <li>✓ Acceptances</li> <li>✓ Any other relevant supporting documentation</li> </ul>	Temporary	Retain for seven (7) years after last action
Applicant with no enrolment record on the Student Management System	Temporary	Retain for 6 months after the census date of the semester that student was due to commence
Unsuccessful applications for admission	Temporary	Retain for six (6) months after the applicant notified of outcome and/or conclusion of any appeals process
External Admission Centres e.g. Universities and Colleges Admission Service (UCAS) in the UK, Universities Admission Centre (UAC) electronic file including academic results and all student/course preferences	Temporary	Retain for two (2) years after relevant Government Department, e.g. DET in Australia, census date
Records relating to the number of places offered in programmes or courses, based on data from the external admission agency	Temporary	Retain for three (3) years after relevant census date
<b>Calendars and Handbooks</b>		
Duplicate sets of calendar and handbook publications	Temporary	Retain until reference ceases
Master set of calendar and handbook publications	Permanent	Retain permanently (electronically)
<b>Enrolment</b>		
Records of individual students relating to academic progress, course progression and unit participation:  <ul style="list-style-type: none"> <li>✓ Exclusions, academic progress, academic standing</li> <li>✓ Warnings regarding poor course progression</li> <li>✓ Withdrawal without academic penalty</li> <li>✓ Certificates/prerequisites for unit participation</li> <li>✓ Visa approvals</li> <li>✓ Immigration notifications relating to enrolment status</li> <li>✓ Credit transfer</li> </ul>	Temporary	Retain until course completion and for seven (7) years after last action  Where course was abandoned, retain until maximum period for course completion elapses plus one (1) year.



Description of Records	Status	Disposal Action
✓ Leave of absence		
<b>Enrolment</b>		
Records used for administrative verification such as records relating to the enrolment of students into courses of study. Documents include: <ul style="list-style-type: none"> <li>✓ Enrolment/re-enrolment forms</li> <li>✓ Verification/Confirmation of Enrolment</li> <li>✓ Course cancellation/changes to enrolment</li> <li>✓ Student arrangements including enrolment times</li> </ul>	Temporary	Retain for four (4) years after last action
<b>Graduation</b>		
Records related to protocols for Academic Dress (if appropriate)	Permanent	Retain permanently
Conferral Proceedings including records related to the conferral of certificates, protocols and transcripts of guest speeches	Temporary	Retain for 10 years after last action
Eligibility to Graduate, including notifications to students regarding finalisation, approval and graduation ceremony	Temporary	Retain for two (2) years after graduation ceremony
Graduation Programs	Temporary	Retain for five (5) years after last action
Requests for replacement testamurs including fees and supporting documentation	Temporary	Retain for two (2) years after last action
Master record of graduands	Permanent	Retain permanently
<b>Student Misconduct (Academic and Non-Academic)</b>		
Records relating to allegations of misconduct, academic or non-academic	Temporary	Retain until course completion.  Where course has been abandoned, retain until maximum period for course completion elapses
Investigations of non-academic misconduct involving external agencies and regarding criminal or legal investigations of non-academic misconduct	Temporary	Retain for seven (7) years after last action
<b>Scholarships, Prizes, Awards and Bursaries</b>		
Administrative arrangements for presentation ceremonies for scholarships, prizes, awards and bursaries awarded by the Company, including programmes of proceedings	Temporary	Retain until reference ceases
Administration, determination and/or nomination of recipients of scholarships, prizes, awards and bursaries.	Temporary	Retain for five (5) years after prize awarded



Description of Records	Status	Disposal Action
Applications for scholarships, prizes, awards and bursaries	Temporary	Retain until end of appeal period
Records relating to the establishment, rules and conditions of scholarships, awards, prizes and bursaries. This includes registers of past recipients of scholarships, awards, prizes and bursaries	Permanent	Retain permanently
<b>Academic Year</b>		
Academic Year – organisation and structure including semester and other reaching period dates and key administrative and committee dates	Temporary	Retain for one (1) year after the academic calendar has been superseded
<b>Student Details</b>		
Change of name, address, or other details	Temporary	Retain history of all contact details until student graduates or exits without graduating. Details should be maintained in chronological order in the student management system.
Photographic images for student identity cards, including negatives.	Temporary	Retain until reference ceases
External enquiries relating to verification of personal details, academic records and student academic progress	Temporary	Retain for one (1) year after last action
<b>Student Fees and Charges</b>		
Administration – fees and fines including tuition fees (not including student contribution fees), and library fines. Including correspondence related to outstanding fees and fines	Temporary	Retain for five (5) years from end of last financial year
Administration – sanction for non-payment of tuition fees (not including student contribution fees), and library fines (Not Paid)	Temporary	Retain for 70 years from date of enrolment
Administration – sanction for non-payment of tuition fees (not including student contribution fees), and library fines (Paid)	Temporary	Retain for three (3) months after last action
Summary of student data maintained in the student information system for the purpose of providing information on individual student. Information retained on the system should include, but is not limited to: <ul style="list-style-type: none"> <li>✓ Student name</li> <li>✓ Student ID</li> <li>✓ Date of birth</li> </ul>	Permanent	Retain permanently



Description of Records	Status	Disposal Action
<ul style="list-style-type: none"> <li>✓ Enrolment summary</li> <li>✓ Misconduct summary</li> <li>✓ Awards/courses completed</li> </ul>		
<b>Student Intake Load</b>		
<p>Records related to student load intake management in courses and/or units. Includes but not limited to:</p> <ul style="list-style-type: none"> <li>✓ Projection and target reports</li> <li>✓ Student load statistic reports</li> </ul>	Temporary	Retain for five (5) years after last action



Description of Records	Status	Disposal Action
<b>Student Services</b>		
<b>Counselling</b>		
Appointment registers and records relating to the provision of counselling programs or activities.	Temporary	Retain for two (2) after last action
Client files – personal, academic and general counselling patient files.	Temporary	Retain for seven (7 ) years after appointment or access on behalf of the client AND until the client is 25 years of age
<b>Equity and Diversity</b>		
Equipment – records relating to provision of equipment and media to students	Temporary	Retain for five (5) years after last action
Records relating to courses devised to facilitate equity and diversity	Temporary	Retain for five (5) after course ceases
<b>Financial Assistance</b>		
Discretionary funds – administration, establishment and maintenance of funds to assist students in attending conferences, sporting competitions etc. including successful applications	Temporary	Retain for five (5) years after last action
Unsuccessful applications for discretionary funds including supporting documentation.	Temporary	Retain for one (1) year after last action
Administration of student loans scheme. Includes records related to the establishment, rules and regulations of the scheme	Temporary	Retain for five (5) years after scheme becomes obsolete
Student loans– successful applications, including: <ul style="list-style-type: none"> <li>✓ Supporting documentation</li> <li>✓ Assessment</li> <li>✓ Approvals</li> <li>✓ Repayments</li> <li>✓ Requests for extensions</li> </ul>	Temporary	Retain for five (5) years after discharge of the loan
Student loans – unsuccessful applications	Temporary	Retain for one (1) year after last action and expiration of appeal period
<b>Learning Skills</b>		
Courses and activities related to the enhancement of learning skills, including provision of information, planning and review.	Temporary	Retain for two (2) years after course superseded
<b>Orientation</b>		
Arrangements for student orientation: Open days , Programmes, etc.	Temporary	Retain for two (2) years after last action
<b>Recreational Services</b>		



Description of Records	Status	Disposal Action
Records relating to the provision of recreational programs or activities	Records relating to the provision of recreational programs or activities	Records relating to the provision of recreational programs or activities



Description of Records	Status	Disposal Action
<b>Learning and Teaching</b>		
<b>Assessment</b>		
Academic records of student grades in College courses and units	Permanent	Retain permanently
Completed assessment including examination scripts and other forms of assessment. Includes written, oral, performance, assignments and presentations	Temporary	Retain for one (1) year after release of results
Attendance records – examinations and other assessment activities	Temporary	Retain for six (6) months after last action
Examination papers – master set	Permanent	Retain permanently
Results - records relating to the results of assessment items or examinations. Includes: <ul style="list-style-type: none"> <li>✓ Appeals</li> <li>✓ Changes</li> <li>✓ Review</li> <li>✓ Grading</li> </ul>	Temporary	Retain for two (2) years after last action
Special arrangements for assessment/examinations for individual students and/or distance education or remote sites	Temporary	Retain for one (1) year after last action
Special consideration requests and outcomes. Includes requests for deferred/supplementary examinations	Temporary	Retain until the end of the appeal period
Examination arrangements - supervision for assessment items and examinations, including invigilation arrangements and timetables	Temporary	Retain for one (1) year after last action
<b>Awards – Staff Teaching Excellence and Staff Administrative/Management Excellence</b>		
Records related to consideration of applications for potential award nomination	Temporary	Retain for five (5) years after award no longer offered
Successful applications and nominations for an award	Permanent	Retain permanently
Applications – unsuccessful: <ul style="list-style-type: none"> <li>✓ Applications nominated for an award which are unsuccessful</li> <li>✓ Applications not nominated after consideration</li> </ul>	Temporary	Retain for five (5) years after award no longer offered
Records related to establishment of awards at a College or campus	Temporary	Retain for five (5) years after award no longer offered
<b>Curriculum Management</b>		
Accreditation by professional bodies – documentation and records	Temporary	Retain for ten (10) years after accreditation expires
Records related to the approval of curricula	Permanent	Retain permanently



Description of Records	Status	Disposal Action
Development of award courses and units – curricula development	Temporary	Retain for 10 years after programme ceases to be offered
Non-award courses or units – development of curricula	Temporary	Retain for five (5) years after last action
Teaching staff working papers for course/subject preparation and delivery	Temporary	Retain for six (6) months after last action
<b>Collaborative Ventures</b>		
Proposals for collaborative of joint ventures which do not proceed	Temporary	Retain for five (5) years after last action
Establishment and strategic management of joint/collaborative ventures. Records include: <ul style="list-style-type: none"> <li>✓ Preliminary discussions</li> <li>✓ Copy of proposal or submission</li> <li>✓ Deed of agreement</li> <li>✓ Appointment of steering committee or board members Terms of reference or tasks</li> <li>✓ Notification of withdrawal</li> <li>✓ Funding agreements College ongoing participation</li> <li>✓ Restructures</li> <li>✓ Financial reports</li> <li>✓ Other strategic matters</li> </ul>	Permanent	Retain permanently
<b>Delivery</b>		
Definitive Course Documents	Permanent	Retain Permanently
Unit Outlines	Temporary	Retain for 10 years after unit last offered
Audio/audio-visual recordings of teaching sessions: <ul style="list-style-type: none"> <li>✓ Lectures</li> <li>✓ Tutorials</li> <li>✓ Seminars</li> <li>✓ Workshops</li> </ul>	Temporary	Retain for six (6) month after last action
Resources and materials used in subject and/or course delivery. Includes: <ul style="list-style-type: none"> <li>✓ Study guides</li> <li>✓ Readings</li> <li>✓ Self-assessment exercises</li> <li>✓ Audio-visual teaching aids</li> <li>✓ Assignments</li> <li>✓ Lecture notes</li> </ul>	Temporary	Retain for two (2) years after last action
<b>Ethical Clearances as required</b>		
Records related to ethical clearance for teaching activities related to animals, includes: <ul style="list-style-type: none"> <li>✓ application</li> <li>✓ supporting documentation</li> <li>✓ assessment</li> </ul>	Temporary	Retain for seven (7) years after last action



Description of Records	Status	Disposal Action
✓ decision		
Records related to human subjects' consent to involvement in teaching activities.	Temporary	Retain for 15 years after project concluded or abandoned
Records related to the ethical clearances required for working with genetically modified material or high risk material, includes: <ul style="list-style-type: none"> <li>✓ application</li> <li>✓ supporting documentation</li> <li>✓ assessment</li> <li>✓ decision</li> </ul>	Temporary	Retain for 15 years after project concluded or abandoned
Records relating to the use of expedited processes for ethical clearance related to teaching activities involving human subjects	Temporary	Retain for 10 years after project concluded or abandoned
Records related to the full process for ethical clearance related to teaching activities involving human subjects	Temporary	Retain for 15 years after project concluded or abandoned
Records relating to the monitoring of ethical practices through both internal and external mechanisms	Temporary	Retain for seven (7) years after project concluded or abandoned
<b>Evaluation</b>		
Administration of data collection for evaluations of teaching, units and courses	Temporary	Retain for two (2) years after last action
Analysis and survey data related to evaluations	Temporary	Retain for five (5) years after last action
Reports of evaluation outcomes	Permanent	Retain permanently
<b>Intellectual Property</b>		
Administrative correspondence related to intellectual property management. Includes: <ul style="list-style-type: none"> <li>✓ Unsuccessful applications for grant or registration of intellectual property</li> <li>✓ Supporting information</li> <li>✓ Searches</li> <li>✓ Correspondence between officers or solicitors/attorneys</li> </ul>	Temporary	Retain for five (5) years after last action
Records related to arrangements for use. Includes: <ul style="list-style-type: none"> <li>✓ Correspondence between licensors and licensees</li> <li>✓ Agreements</li> <li>✓ Material or product transfer</li> </ul>	Temporary	Retain for seven (7) years after expiry or cancellation of agreement
Records relating to intellectual property disputes, includes:	Temporary	Retain for 10 years after last action



Description of Records	Status	Disposal Action
<ul style="list-style-type: none"> <li>✓ Notification</li> <li>✓ Mediation</li> <li>✓ Agreement</li> <li>✓ Outcome</li> </ul>		
<p>Registration records of intellectual property, includes:</p> <ul style="list-style-type: none"> <li>✓ Applications for grant or registration</li> <li>✓ Formal assignment of intellectual property</li> <li>✓ Request form, specification, patent – provisional or complete</li> <li>✓ Request for examination</li> <li>✓ Acceptance</li> <li>✓ Objection – statement, hearings</li> <li>✓ Extensions for registration</li> <li>✓ Renewal</li> <li>✓ Supporting documents</li> <li>✓ Final documents (e.g. the sealed patent licence)</li> </ul>	Permanent	Retain permanently
<b>Learning Materials</b>		
Records related to the acquisition and disposal of chemicals, specimens, drugs, poisons etc. used in teaching and learning activities and not controlled by other legislation/regulations	Temporary	Retain for five (5) years after last action
Records related to the management of clinical and hazardous waste in accordance with regulatory requirements set out under the relevant environment protection Act e.g. the <i>Environment Protection Act 1997</i> (the Act) in Australia	Temporary	Retain for five (5) years after last action
<b>Practicum</b>		
Records of administrative arrangements related to practicum placements	Temporary	Retain for two (2) years after last action
Agreements with other organisations to allow placements	Temporary	Retain for 15 years after expiry or cancellation of agreement
Participation records providing proof of the number of hours completed by students and the level of performance where required	Temporary	Retain until course completion, or if course abandoned, until maximum period for course completion has elapsed
<b>Teaching Projects</b>		
Agreements/contracts for teaching projects.	Temporary	Retain for seven (7) years after expiry of agreement OR 15 years after expiry of agreement if signed under seal



Description of Records	Status	Disposal Action
Records regarding the formulation and development of teaching projects. Includes working papers and preliminary data	Temporary	Retain for five (5) years after project completion
Funding proposals for teaching projects, includes: <ul style="list-style-type: none"> <li>✓ Successful and unsuccessful proposals for internal and external competitive and non-competitive funding</li> <li>✓ Application forms</li> <li>✓ Tenders</li> <li>✓ Supporting information</li> <li>✓ Referees</li> <li>✓ Protocols</li> <li>✓ Reports</li> </ul>	Temporary	Retain for five (5) years after last action
Reports on individual projects as required by conditions of granting bodies, legislation and protocol <b>OR</b> Communication to the wider community. Includes any and all progress or interim reports, final reports and presentations	Temporary	Retain for five (5) years after project completion
<b>Teaching Strategy Development</b>		
Approved operational teaching plan, inclusive of improvement plan and areas of focus in teaching delivery	Temporary	Retain for five (5) years after plan superseded
Records related to formulation, development and evaluation of operational teaching plans and teaching strategies, including proposals, correspondence, briefing and discussion papers	Temporary	Retain for three (3) years after last action
Approved strategic learning and teaching plan, mapped to the Company's mission statement, objectives, goals and performance indicators and all supporting documents, inclusive of approval documentation	Permanent	Retain permanently
<b>Timetabling</b>		
Records related to the booking of classes, exams and workshops for teaching or other purposes	Temporary	Retain for one (1) year after last action



Description of Records	Status	Disposal Action
<b>GOVERNANCE</b>		
<b>Annual Submissions</b>		
Annual submissions to Government related to core business activities	Permanent	Retain permanently
Submissions to Government on other business activities including for example programme approvals for student income support payments	Temporary	Retain for 10 years after submission
<b>Committees</b>		
Committee papers for working parties include: <ul style="list-style-type: none"> <li>✓ Minutes</li> <li>✓ Agendas</li> <li>✓ Submissions</li> </ul>	Temporary	Retain for two (2) years after relevant working party ceases to exist
Committee records – governing boards and significant committees and includes records of meetings of the following groups but is not limited to: <ul style="list-style-type: none"> <li>✓ Board of Directors</li> <li>✓ Navitas Leadership Team</li> <li>✓ Audit and Risk Committee</li> <li>✓ Finance Committee</li> <li>✓ Academic Board</li> <li>✓ Senior Executive Management Group/s</li> <li>✓ Learning and Teaching Committee/Academic Quality Committee</li> <li>✓ Curriculum Review and Renewal working Party/ies</li> <li>✓ Examinations and Progression Committee</li> <li>✓ Academic Appeals and Grievances Committee</li> <li>✓ Marketing and Admissions Planning Committee</li> <li>✓ General Operations Committee (UX Group)</li> <li>✓ College Enhancement Committee</li> <li>✓ Risk and Compliance Committee</li> <li>✓ Executive Team</li> </ul> Committees' Records include: <ul style="list-style-type: none"> <li>✓ Master set of meeting papers</li> <li>✓ Agendas</li> <li>✓ Constitution or terms of reference</li> <li>✓ Signed minutes</li> <li>✓ Records related to the appointment of members (not including records related to member election)</li> </ul>	Permanent	Retain permanently



Description of Records	Status	Disposal Action
<p>Records documenting activities of key Committees/Boards, particularly for example the Academic Board, which report to Navitas Limited' Board of Directors and/or Divisional Boards of Directors, major boards/committees of Divisions, or ad-hoc committees. Documentation to be retained includes:</p> <ul style="list-style-type: none"> <li>✓ Master set of meeting papers</li> <li>✓ Agenda</li> <li>✓ Constitution or terms of reference</li> <li>✓ Signed minutes</li> <li>✓ Records related to the appointment of members (not including records related to member election)</li> </ul>	Temporary	Retain for ten (10) years after committee ceases to exist
<b>Corporate Identity</b>		
Records related to the development of corporate identity objects including design and format. Examples include letterhead, logo, testamurs, and common seal.	Permanent	Retain Permanently
Records related to falsification or misuse of corporate identity. Examples include fraudulent use of web content, falsified transcripts	Temporary	Retain for seven (7) after last action
Records relating to the protection of the Company's identity. Includes registration of logo, trademarks, applications and approvals	Permanent	Retain permanently
Records or registers of use of Navitas seal	Temporary	Retain for seven (7) years after last action
<b>Elections</b>		
<p>Records related to the conduct of elections. Includes:</p> <ul style="list-style-type: none"> <li>✓ Advertising</li> <li>✓ Nominations</li> <li>✓ Ballot papers</li> <li>✓ Notices</li> <li>✓ Results</li> <li>✓ Appointment of scrutineers</li> <li>✓ Tally sheets</li> </ul>	Temporary	Retain for one (1) year after declaration of election result
Electoral roles and related records of individuals eligible to vote	Temporary	Retain for one (1) year after declaration of election result
Results of elections	Temporary	Retain for 5 years after declaration of election result
<b>Licensing and Accreditation</b>		



Description of Records	Status	Disposal Action
Registration and Accreditation approvals and supporting documentation	Permanent	Retain permanently
<b>Risk Management</b>		
Records relating to claims of fidelity guarantee and coverage for fraud	Temporary	Retain for seven (7) years after last action
Allegations and claims of professional negligence and public liability compensation which have not been finalised by litigation – claims related to adults	Temporary	Retain for seven (7) years after claim settled
Allegations and claims of professional negligence and public liability compensation which have not been finalised by litigation – claims related to minors	Temporary	Retain for 30 years after claim settled
Records of notification of injury or accidents – adult students, visitors, or members of the general public	Temporary	Retain for 10 years after last action
Records of notification of injury or accidents – minor students, visitors, or members of the general public	Temporary	Retain for 30 years after last action
Allegations and claims finalised without litigation. Examples include motor vehicle or property damage	Temporary	Retain for seven (7) years after claim settled
Records related to risk management controls implemented by the College	Temporary	Retain for seven (7) years after last action
Insurance policy documents (includes renewals and associated correspondence)	Temporary	Retain for seven (7) years after expiration of the policy
<b>Rules and Statutes</b>		
Approved rules and statutes	Permanent	Retain permanently
Working papers and research material used in the preparation of drafts	Temporary	Retain for six (6) months after last action
Records related to the making and amending of rules and statutes. Records include formal consultation and submissions, and developmental drafts and correspondence which authorise further stages of development.	Temporary	Retain for five (5) years after last action



## **Appendix B**

### **Records that WSUIC must retain in accordance with the ESOS National Code 2018, Higher Education Standards Framework 2015 and the National Standards for Foundation Programs**

NOTE: Though every effort has been made to identify key records that WSUIC must retain as per the ESOS National Code 2018, Higher Education Standards Framework 2015 and the National Standards for Foundation Programs, it is recommended that the said standards are referred to if there is a particular record that is deemed required for retention but has not been included in this list.

#### **ESOS National Code 2018:**

- Standard 3 Formalisation of enrolment and written agreements
  - The registered provider must retain records of all written agreements as well as receipts of payments made by students under the written agreement for at least 2 years after the person ceases to be an accepted student.
- Standard 5 Younger overseas students
  - maintain up-to-date records of the student's contact details as outlined in Standard 3.5, including the contact details of the student's parent(s), legal guardian or any adult responsible for the student's welfare
- Standard 7 Overseas student transfers
  - The registered provider must maintain records of all requests from overseas students for a release and the assessment of, and decision regarding, the request for two years after the overseas student ceases to be an accepted student.

#### **ESOS Act 2000:**

- Section 21 Record keeping
  - A registered provider must keep records of each accepted student who is enrolled with the provider or who has paid any tuition fees for a course provided by the provider.
  - The records must consist of the following details for each accepted student:



- (a) the student's current residential address;
  - (b) the student's mobile phone number (if any);
  - (c) the student's email address (if any);
  - (d) any other details prescribed by the regulations.
- A registered provider must have a procedure to ensure that, at least every 6 months, while the student remains an accepted student of the provider:
    - (a) the provider confirms, in writing, the details referred to in subsection (2) with the student; and
    - (b) the records are updated accordingly.
  - If: (a) an accepted student of a registered provider completes a unit of study for a course; and (b) the student's progress in that unit is assessed; then the provider must record the outcome of the student's assessment for the unit.
  - Records of assessment must be: (a) kept in accordance with any requirements prescribed by the regulations; and (b) kept up-to-date.
  - The provider must retain records kept under Section 21 for at least two years after the person ceases to be an accepted student. However, the records do not need to be kept up-to-date after the cessation.

#### **Higher Education Standards Framework 2015**

- Records of enrolments, progression, completions and award of qualifications
- Records of incidents and resolution of formal complaints must be kept, including time taken to reach a resolution
- Records of and responses to allegations of misconduct, breaches of academic integrity and critical incidents

#### **National Standards for Foundation Programs**

- Records of individual student's results in examinations and assessed coursework must be retained by the provider and provided to the student
- Evidence that a student has completed the equivalent of Year 11 must be provided. Records of this evidence must be kept on file



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International College

- Evidence must be provided of the student being at least 17 years of age at the time of commencement, or 16 years of age in the case of an exemption. Records of this evidence must be kept on file
- The Curriculum Vitae, together with certified copies of degrees and qualifications, of all teachers employed to teach on the Foundation Program must be retained as evidence of compliance with this standard. All Foundation Program teachers' Curriculum Vitae must be held on file.