

RECORDS AND DATA MANAGEMENT POLICY AND PROCEDURE

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RECORDS AND DATA MANAGEMENT POLICY AND PROCEDURE

1. PURPOSE

1.1 This policy and procedure provide a framework for records and information management within Learn to Fly and outlines the principles for appropriate management of the Organisation's information throughout the information lifecycle.

2. SCOPE

2.1 This policy and procedure relate to all Organisation information and applies to all staff and contracted service providers who work for, or on behalf of, the organisation.

3. POLICY STATEMENT

3.1 Learn to Fly is committed to a culture of best-practice records and information management, compliant with the relevant legislative and regulatory requirements.

3.2 Records and information are captured, managed and used in the most efficient and appropriate format, with a preference for the creation and maintenance of digital only records wherever possible. Information is not unnecessarily duplicated, and the creation, storage and management of irrelevant, un-necessary or ephemeral information is kept to a minimum.

3.3 Learn to Fly maintains a robust information security environment which supports transparent, open and efficient access to information commensurate with the nature and content of that information, while protecting Learn to Fly information from unauthorised access, use, disclosure, modification, loss or damage.

3.4 Personal information is collected lawfully and fairly, and is safeguarded from unauthorised access, use, disclosure, modification or loss in accordance with the Information Privacy Act 2009 and LTF's Privacy Policy.

4. PROCEDURES

4.1 IDENTIFYING RECORDS

All staff are obliged to create, capture, manage and retain full and accurate records of the organisation's activities and decisions. All information is to be captured, managed and used in the most appropriate format.

A organisation record is any form of recorded information, received or created, that is of historical significance to LTF, or which provides evidence of the decisions and actions of the organisation while undertaking its business activities. Learn to Fly's business encompasses all forms of its Training and assessment, engagement, organisational and cultural activities.

Learn to Fly's records serve to:

- protect the rights and interests of individuals at LTF
- provide evidence of the full spectrum of business undertaken by LTF
- explain and justify the actions of LTF and its employees

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- document and explain the decision-making of LTF
- provide the context of an activity
- preserve the history of LTF, and
- determine that the policies and procedures of LTF were followed during the conduct of that business.

A full and accurate organisation record will show what occurred, when it occurred, how it occurred and who participated.

The organisation conducts its business as “digital by default”, wherever possible, with records created in digital format. Information received and records created digitally are to be maintained in digital format throughout the information lifecycle. Hard copy records are to be created only when absolutely necessary.

Staff should consider the purposes of LTF records to evidence the organisation’s business activities when determining whether a written note of a conversation should be made. A conversation only becomes an LTF record when a written note (in any form) has been made of that conversation/discussion.

The following are not organisation records:

- a) documents that are not related to LTF or its business activities and decisions
- b) documents or messages of short-term temporary informational value, or otherwise designated as “ephemeral”, “transitory” or “normal administrative practice” in an approved Retention and Disposal Schedule
- c) copies or duplicates of LTF records, provided that the record has been captured appropriately elsewhere in the organisation, and where:
 - nothing has been added, annotated, changed or deleted on the copies
 - the copies have been created, distributed and used only for reference purposes, and
 - the copies are not the subject of or associated with further business activity
- d) documents or messages (whether in physical or electronic form) that have been created but not transmitted, submitted, used or otherwise relied upon
- e) drafts not intended for use or reference (ie. incomplete drafts), and drafts of any type of record, provided they do not contain significant or substantial changes or annotations that provide insight into the evolution of the final version.

Records that contribute to the history of LTF, state or nation will be retained permanently. All such records should be transferred to the organisations Archives for long-term storage and preservation.

All business areas, records owners and process owners are responsible for developing, documenting and implementing processes that ensure efficient and compliant management of LTF records within their area. Business

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processes should be regularly reviewed by process owners, and optimised to integrate and/or automate records and information management requirements, reduce inefficiencies, and improve service levels. Capture, storage and management of records.

All business areas, records owners and process owners are responsible for identifying what records need to be created or captured within their area of responsibility to establish a full and accurate account of LTF's business activities and decisions.

All LTF records should be created and/or captured in a timely and efficient fashion in a well-managed system with appropriate recordkeeping functionality and security, as befits the nature and minimum retention period of those records, and commensurate with the level of business-risk associated with those records. This includes physical systems (such as filing cabinets or archive boxes) as well as electronic systems.

All LTF records, irrespective of their format and the systems they are captured in, should be captured, managed and classified in a methodical and logical way, that allows for records to be related to discrete disposal classes with a minimum of effort.

Digital source records (ie. records that were received or "born" in a digital format) should be captured, managed, used and retained in their original digital format wherever possible. Conversion to another digital format should only be undertaken after consideration of the records management requirements, and any conversion between digital formats that results in a loss of context or degradation of the record (such as converting an email message to a PDF file) is to be avoided. The conversion of digital source records to a paper format (eg. print-outs for inclusion in a paper file) is not permitted, except where such records are required for further business action or for legal purposes.

4.2 INFORMATION SYSTEMS

LTF uses and maintains records in a variety of information systems, including FSM and Axcelerate as dedicated records management system. Digital records must be captured and managed within an approved information system.

The development and implementation of information systems and the business processes for those systems, and any subsequent changes to those systems and processes, must include due consideration of the records management requirements. The consideration of such requirements should form a timely and integral part of the development and implementation process.

Updates to software also require consideration of the accessibility of formats into the future, to ensure records remain accessibility throughout their retention period.

The disposal of LTF records within an information system is subject to the procedures below.

The migration of LTF records from one information system to another, and the subsequent decommissioning of any information system, is subject to the requirements of the Retention and Disposal of LTF records procedures below.

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4.3 USE OF EMAIL

Email applications are transactional and facilitative in nature. Email applications and email archives are not approved information systems and are not appropriate systems for the storage and management of LTF records.

Where an email comprises an LTF record (ie. provides evidence of the LTF's business activities and decisions), staff are obliged to capture that email and/or its attachments into the relevant approved information system in a timely fashion.

4.4 USE OF AXCELERATE

LTF maintains Axcelerate as its dedicated electronic document and records management system in addition to a Learning Management System and Student Management System for VET and CRICOS purposes (inclusive of VSL).

Only LTF related records are to be registered into Axcelerate.

Digital source records with a permanent retention period must be stored in Axcelerate.

All departments, records owners and process owners are responsible for registering into Axcelerate all relevant LTF records within their area, where resources permit. The organisation will provide departments with sufficient access and training to support the timely and efficient registration of the relevant records into Axcelerate.

Access to Axcelerate is subject to initial approval by the RTO Manager, and subject to final approval by the CEO. Requests for Axcelerate access must be forwarded to the RTO Manager.

To ensure the integrity and security of LTF's information, access to Axcelerate will be reviewed in a regular and systematic manner. Individual staff members' access to Axcelerate may be amended, suspended or terminated as a result of staff movements, or changes to contract dates and other employment conditions.

4.5 USE OF SHARED DRIVE

Shared network drives should be used primarily as collaborative workspaces, or as temporary repositories for reference material, short-term transitory documents and other "ephemeral" documents.

Shared network drives are not approved information systems and are not to be used for in-place records management, as they do not possess appropriate recordkeeping functionality.

Where a document or file in a shared drive evolves into (or is likely to evolve into) an LTF record, that document or file should be captured into an approved information system at the earliest opportunity.

4.6 NAMING OF DIGITAL RECORDS

The ability to find, access and preserve these records depends largely upon where digital records are saved, how they are named, and the additional metadata attached to them.

All Departments, records owners and process owners are responsible for developing and documenting specific naming conventions for records within their area of responsibility, in consultation with the RTO Manager/Student Training Manager and CEO.

All digital records, irrespective of their source and format, are to be assigned a meaningful and consistent title at the time they are captured, consistent with the relevant naming conventions.

As a minimum, digital records of incoming, outgoing and internal correspondence between parties should include the following metadata elements: author, addressee, and date/time of issue/receipt.

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As a minimum, hard copy records of incoming correspondence should be stamped with the date/time of receipt, the receiving officer's department, and the receiving officer's initials.

4.7 ACCESS AND SECURITY OF LTF RECORDS

Staff are to only access those files and records which are necessary for the proper fulfilment of their duties, or that they are lawfully requested to access.

The access, use and disclosure of LTF's information and access to information systems is subject to the requirements of LTF's Privacy Policy and Procedure.

4.8 RETENTION AND DISPOSAL OF LTF RECORDS STORAGE AND MANAGEMENT OF HARD COPY RECORDS

Active records (ie. records still in frequent use and required for current business) should be stored and managed within the Department that uses and/or relies upon those records. Active records may be sorted and stored in whatever manner best facilitates their use. However, in deciding how active records will be stored, consider the ease with which those records can be prepared for storage once they become inactive.

Inactive records (ie. records not subject to frequent use, nor required for current business), should be assessed prior to archiving to determine if the minimum retention periods for those records have been met. Where the minimum retention period has been met, the records may be disposed of.

Inactive records that have not met their minimum retention period should be prepared for storage as follows:

- group like records together based on subject, activity and/or process
- remove all extraneous materials from the records, including rubber bands, paperclips, bulldog clips, plastic sleeves, lever arch folders, ring binders and display folders.
- where batches of records need to be distinguished from one another within an archive box, use string, cardboard folder dividers, manila folders and/or cardboard document wallets only
- place the records into archive boxes.
- complete the Archive Box Contents List
- affix the fully-completed contents list to one end of the box, ensuring that the handles of the box are not covered.

Inactive records with less than 12 months remaining on their retention period should be stored and managed within the record owner's Department.

Inactive records with 12 months or more remaining on their retention period should be transferred to LTF's archives

Inactive records that have been assigned a status of "inactive" must be transferred to LTF's archives.

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4.9 TRANSFERRING OF PHYSICAL RECORDS TO LTF ARCHIVES

Physical records that are deemed to have continuing value, either permanently or temporarily, should be transferred to LTF's archive facility subject to the following requirements.

- a) Transferral of records is subject to prior approval by the RTO Manager; please contact the RTO Manager before transferring any records.
- b) Records with less than 12 months remaining on their retention period will not be accepted for transfer, unless exceptional circumstances apply.
- c) Records that do not comply with the Storage and management of hard copy records requirements will not be accepted for transfer, except where necessitated by business needs and resourcing requirements.
- d) Where records transferred to LTF archive have been misrepresented, and do not comply with the Storage and management of hard copy records requirements, the record owner is responsible for making those records compliant.

Access to LTF's archives is restricted. Unauthorised access to the LTF's archives, and the unauthorised access, use and/or removal of records therein, is not permitted.

All requests to retrieve records from LTF's archive are to be forwarded to the RTO Manager. Upon receipt of a retrieval request, the RTO Manager will conduct a search for the records and will arrange appropriate access to the records.

Except where approval has been granted for permanent removal, all records retrieved from LTF archive must be returned once they are no longer required. Contact the RTO Manager to arrange the collection and return of the records.

4.10 DISPOSAL OF LTF RECORDS

The retention and disposal of LTF records is governed by the relevant Retention and Disposal Schedules issued by the Victorian State Archivist. These schedules specify the minimum period that certain classes of records must be retained, and the conditions under which they may be disposed of.

LTF may elect to retain certain classes of records for longer than the minimum retention period, and any such extensions will be specified in the relevant policies and procedures.

The disposal of LTF records, irrespective of their format, source and/or location, is not permitted, except where authorised by the RTO Manager and subject to the following requirements.

- a) Identify records ready for disposal by grouping like records together based on subject, activity and/or process. Ensure that the records are no longer required for reference purposes and are not subject to any current legal matters.

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- b) Refer to the relevant Retention and Disposal Schedule
- c) Complete a Request to Dispose
- d) Email the completed form to the RTO Manager. The RTO Manager will evaluate the request against the relevant schedules, legislation and LTF requirements. The records must not be disposed of until a determination is made and approval is provided to the requester.
- e) Following approval, disposal of the relevant records should be completed as soon as possible. The disposal of physical records must be affected by secure cross-cut shredding, or the use of secure confidential bins from a registered provider, or by another secure means as befits the type of record. Digital records should be deleted in such a manner that the contents of those records cannot be recovered and/or reconstructed.

5. RESPONSIBILITIES AND COMPLIANCE

All staff are responsible for creating, capturing, using, retaining and disposing of LTF information in accordance with this policy and procedure, and are required to familiarise themselves with their records management obligations and responsibilities. Staff are personally accountable for the correct management and use of LTF records and information in the course of performing their assigned roles and responsibilities. LTF will ensure that training and resources are made available to staff, commensurate with their roles and responsibilities.

All Departments, records owners and process owners are responsible for documenting and implementing processes that ensure the correct management of LTF records within their area.

All managers are responsible for the implementation of, and adherence to, this policy within their department.

LTF's Records Team, under the direction of the CEO, informs the development and implementation of records management policies and procedures to ensure compliance with legislative and regulatory requirements. The RTO Manager is responsible for authorising the disposal of any and all LTF records. The RTO Manager is also responsible for administration of user accounts and the, education and training of staff in records management practices and the use of shared drives and LMS; management of LTF's archives; and providing advice and assistance in relation to records management enquiries.

The CEO has overall responsibility for the implementation of, and adherence to, this policy and procedure.

The Chief Executive Officer is responsible for ensuring that the management of LTF's records and information complies with legislative and regulatory requirements.

6. REPORTING

LTF must include details of its compliance with the Public Records Act 2002 in its Reporting to the Compliance Committee annually.

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7. LEGISLATIVE AUTHORITY

[Standards for RTO's 2015](#)

[High Education Support Act \(HESA\) 2003 \(Cth\)](#)

[Privacy Act 1988](#)

8. APPROVAL AND REVIEW DETAILS

APPROVAL AND REVIEW	DETAILS
Approval authority	Chief Executive Officer
Committee to approve	Compliance Committee
Administrator	RTO Manager
Next Review	December 2022
Version	2.0 March 22