

Bendigo Kangan

Institute

Records Management Policy

1.0 Purpose

This policy outlines how BKI manages its corporate records for their entire lifecycle. It also outlines how BKI facilitates legislative compliance and effective business practice and protects its information assets as evidence of current practice and to support future activities.

2.0 Scope

This policy applies to all BKI personnel, including permanent and temporary employees, contractors, volunteers, and third-party or subcontracted providers - both onshore and offshore. For outsourced services, compliance with this policy is ensured by incorporating record-keeping provisions into contractual agreements with service providers.

Additionally, this policy encompasses every facet of BKI's operations. It covers all records generated during business transactions, as well as all business software applications and devices, such as email systems and databases, used to create or manage records. The policy applies to records in every format and on all types of media, whether hardcopy or electronic, that are created or received by BKI to support its business activities and transactions. It also includes documentation of verbal interactions, such as meetings and telephone calls, ensuring that records of these activities are managed appropriately, regardless of the medium used for capture or storage.

3.0 Legislative and Regulatory Context

- *Archives Act 1983 (Cth)*
- *Civil Procedure Act 2010 (Vic)*
- *Crimes Act 1958 (Vic)*
- *Education Services for Overseas Students (ESOS) Act 2000 (Cth)*
- *Electronic Transactions Act 2000 (Vic)*
- *Evidence (Miscellaneous Provisions) Act 1958 (Vic)*
- *Evidence Act 2008 (Vic)*
- *Freedom of Information Act 1982 (Cth)*
- *Health Records Act 2001 (Vic)*
- *National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025*
- *National Vocational Education and Training Regulator Act 2011 (Cth)*
- *Occupational Health and Safety Act 2004 (Vic)*

Approval Authority: Head of Governance, Risk and Compliance

Doc Custodian: Manager, Records and Information

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- *Privacy and Data Protection Act 2014 (Vic)*
- *Privacy and Data Protection Act 2014 (Vic)*
- *Public Administration Act (Vic) 2004*
- *Public Records Act 1973 (Vic)*
- *The National Code of Practice for Providers of Education and Training to Overseas Students 2018*

4.0 Policy Statement

BKI is committed to creating and maintaining corporate records that provide an accurate account of its business operations. To support this, BKI takes a strategic approach to information and records management, ensuring planning, execution, and oversight are managed with clearly defined roles and responsibilities throughout the organisation. Resources are dedicated to developing, implementing, maintaining, and continuously improving the information and records management framework. BKI regularly reviews and reports on compliance, adhering to consistent processes for generating, maintaining, controlling, retaining, storing, and disposing of records, including digital formats. The organisation upholds robust security, privacy, and confidentiality measures to protect all information and records, maintaining the authenticity and integrity of its recordkeeping systems. Procedures also incorporate disaster preparedness, the protection of vital records, and heritage considerations. BKI actively manages electronic records to address operational needs and align with industry best practice, ensuring all records are handled in a systematic and cost-effective manner.

4.1 Guidance

BKI will provide all employees with appropriate guidance, tools and services to ensure all recordkeeping commitments and legislative obligations are achieved. This means that BKI will ensure all employees, contractors and volunteers should receive appropriate training, guidelines and practical advice.

4.1.1 Compliance

BKI is committed to compliance with the *Public Records Act 1973 (Vic)* standards established by Public Record Office Victoria (PROV), Australian Standard for Records Management, AS ISO 15489-2002, Australian Skills Quality Authority (ASQA), Victorian Registration and Qualifications Authority (VRQA), ISO 9001:2015 Quality Management Systems, ISO 27001:2022 Information Security Management System Documentation Control requirements. This means BKI will:

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- Comply with the legislative and administrative requirements for recordkeeping, including those for the provision of privacy and evidence.
- Not condone the falsification, alteration, or damage of records.
- Not condone the destruction of records, except in accordance with Public Records Office Victoria records management standards and retention and disposal schedules. Records reasonably likely to be required as evidence in current or future legal proceedings will not be destroyed, concealed, rendered illegible, undecipherable or incapable of identification.

4.1.2 Digital Records

BKI is working towards the digital (electronic) format of corporate records being regarded as the primary record, in accordance with the Digitisation Procedure.

4.1.3 SharePoint

SharePoint (BKI's Electronic Document and Records Management System (EDRMS)) is to be used to house records / information created or received in the conduct of BKI business, unless records are stored on one of BKI's other enterprise systems i.e.,

- Financial documents (Tech One)
- Student Ready
- Apprenticeship Student Management System (ASMS).
- Moodle (MyLearning)
- HRIS
- ESS
- Digital Student Records (DSR)
- Tradeassess
- VETtrack
- ReadySkills
- Skillsassess
- Skills Assessment Support
- RecordVerify

4.2 Records Management Compliance

Records must be maintained on BKI's systems or infrastructure capable of meeting records management standards and legislative requirements. Any system must be assessed for compliance with records standards (e.g., through a Privacy Impact Assessment) before implementation or before records are migrated to or from the system. Major changes to existing systems also require such compliance assessments.

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4.3 Organisation and Accessibility

Records must be organised and managed to preserve their context and ease of retrieval. Throughout their full retention period, records must be actively managed and organised to maintain context, accessibility, and usability.

4.4 Retention and Disposal

Records must be retained and disposed of according to BKI's Retention and Disposal Authority. Temporary value records must be destroyed as soon as reasonably practicable after the date specified in the Authority, using secure and permanent methods, unless there is a current business need for continued use or pending/anticipated legal action (including Freedom of Information requests). Permanent value records must be transferred to the BKI Archives for ongoing preservation and access.

4.5 Storage Conditions

Records must be stored in conditions suitable to the length of time they must be kept, the nature of their content (e.g., personal, confidential, or sensitive information), and the format or medium of the record.

4.6 Research Records

Research records and data must be managed in accordance with this policy.

4.7 Access and Security

Records must be made available in compliance with legislation and within the constraints of security, confidentiality, privacy, and archival access conditions.

4.8 Policy Consistency

All procedures and practices concerning records management within BKI must be consistent with this policy.

5.0 Roles and Responsibilities

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Role	Responsibilities
Chief Executive Officer (CEO)	The Chief Executive Officer (CEO) is responsible for ensuring a viable and effective records management program, as per s 13 of the <i>Public Records Act 1973 (Vic)</i> . This includes resources and supporting and promoting records management policies, procedures, standards and guidelines.

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Contract Manager	<p>Contract Managers must ensure records are maintained and retained in respect of:</p> <ul style="list-style-type: none"> • All claims received and evaluated, contract date – inclusion of calculation and computations. • All variations received or approved (signed by the authorised delegate) • Any Quantity Surveyor or estimate data. • Site records for construction contracts • Photographic, media or any electronic data associated with a contract. • Ensuring all variation to contracts is held on the BKI records files. <p>Contract Managers are responsible for ensuring that external service providers comply with the following requirements:</p> <ul style="list-style-type: none"> • Complete and accurate creation and management of records that provide proper evidence of the business activities and work functions for which the external service providers are responsible, in line with records management policies and procedures. This requirement applies to both hardcopy and electronic information, including email. • Compliance with the <i>Public Records Act 1973</i> (VIC) and any other applicable legislation relating to recordkeeping obligations. • Respecting and protecting the confidentiality of records, preventing unauthorised access and release of information. • Ensuring that all records are returned to BKI at the completion or termination of the contract or work arrangement. <p>It is the Contract Manager’s duty to oversee and verify that external service providers adhere to these standards throughout the duration of their engagement.</p>

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Role	Responsibilities
Head Governance Risk and Compliance /	<ul style="list-style-type: none"> Ensure that the Records Management Program is adequately supported and resourced. Representing records management interests of the Executive Management Team. Ensure the reliability, continuing operation and full functionality of corporate systems that generate records. Oversee all aspects of the Records Management Program, in conjunction with the Manager Records and Information.
Executive Director VETASSESS	Ensures that VETASSESS follows the Records Management Program.
Manager, Records and Information Management / Records and Information Coordinator	<ul style="list-style-type: none"> Design, implementation and maintenance of the corporate recordkeeping system. Monitoring and reviewing compliance of corporate information and recordkeeping practices. Development and implementation of policies, procedures and corporate standards for recordkeeping. Providing advice to BKI Management on corporate recordkeeping requirements, and Providing advice on service trends and industry developments to Management. Overseeing employees training needs on records management and the corporate recordkeeping system, in liaison with Managers Authorising the destruction of public records in accordance with the <i>Public Records Act 1973 (Vic)</i>.

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Role	Responsibilities
Managers, Team Leaders, Supervisor and Coordinators	<ul style="list-style-type: none"> Responsible for monitoring staff under their supervision to ensure that they understand and comply with records management policies and procedures Fostering and supporting a culture within their work group that promotes good record management practices Assessing and monitoring compliance with this policy and other Records Management documentation and reporting any identified compliance breaches or incidents.
All BKI employees	<ul style="list-style-type: none"> Responsible for ensuring that complete records are accurately created and managed properly and adequately record evidence of the business activities of the work functions for which they are responsible in accordance with Records Management policy and procedures. This is applicable to both hardcopy and electronic information, including email, social media posts, conversations and messaging services / devices. Responsible for disposing of records in accordance with established procedures. Must respect the confidentiality of Corporate Records and the privacy of personal information and protect records from unauthorised access and release of information. Must comply with the requirements of the Public Records Act 1973, ASQA and VRQA requirements, VET Funding Contracts and any other applicable legislation pertaining to recordkeeping. Must, upon ceasing employment with BKI, ensure that all files/records in their possession are transferred to custody of their supervisor or successor or returned to the Records Management Team.

6.0 Definitions

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Word/Term	Definition
Disposal	A range of processes associated with implementing records retention, destruction, or transfer decisions, which are documented in BKI Records Retention and Disposal Authority.
Normal Administrative Process (NAP)	A process that allows BKI to destroy certain types of low-value and short-term information in the normal course of business.
Permanent value record	A record defined as permanent in BKI Records Retention and Disposal Authority, because it has been appraised to have ongoing historical and/or cultural value.
Privacy Impact Assessment	A process for identifying and analysing potential privacy risks and developing risk mitigation strategies to address these privacy impacts before a project or initiative commences. See Privacy and Information Policy for further information.
Record	Information in any format created, received, and maintained as evidence by BKI, in pursuant of legal obligations or in the transaction of business.
Retention period	The minimum period that records must be kept before they can be legally destroyed.
Temporary value record	A record defined as temporary in BKI Records Retention and Disposal Authority, which is required to be kept for a minimum period for legislative or other requirements, before it can be destroyed.
BKI Records Retention and Disposal Authority (RDA)	An instrument, which sets out the requirements for the retention and destruction of BKI records and information, in line with legislative and business needs, as well as recordkeeping standards issued under the <i>Public Records Act 1973</i> (Vic).

7.0 Supporting Policy Documents and Forms

Document Name
Records Management Framework
Records Management Strategy
Digitisation Procedure
Archive Transfer and Disposal Procedure
Data Breach Process and Reporting Procedure

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Document Name
Privacy and Freedom of Information Policy
Risk Management Framework
ISO 27001:2022 Information Security Management System

8.0 Version Control and Change History

Ver.	Issue Date	Document Custodian	Description of Change	Approval Authority
1.0	07/01/2021	Records Manager	New policy	Enterprise Assurance Lead
2.0	11/02/2021	Enterprise Assurance Lead	Updated draft	
3.0	22/02/2021	Records Manager	Updated draft	
4.0	01/03/2021	Records Manager	Updated draft	
5.0	24/03/2021	Records Manager	Updated version	
6.0	10/05/2021	Records Manager	Approved and finalised	Enterprise Assurance Lead
7.0	04/12/2025	Manager, Records and Information Management	Incorporate VETASSESS into BKI Policy	Head of Governance, Risk and Compliance
7.1	15/06/2026	Manager, Records and Information Management	Fixing of typo and insertion of <i>Education Services for Overseas Students (ESOS) Act 2000</i> (Cth) in Legislative and Regulatory Context.	Head of Governance, Risk and Compliance

9.0 Document Owner and Approval Body

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Document Custodian	Approval Authority	Approval Date	Next Scheduled Review Date
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