Record Keeping Procedural Guidelines

Record Keeping Procedural Guidelines

Purpose

To outline the AIIU's record keeping arrangements for exchange students to comply with all relevant legislation, including the *VRQA Guidelines for Student Exchange Programs.*

Roles and responsibilities

AIIU, Third-Party Organisations and/or school staff

- Responsible for collecting, holding, managing, using, disclosing and transferring personal and health information in accordance with relevant information and privacy policies and legislation.
- Responsible for creating and managing records of all decisions, actions, outcomes and business activities in accordance with relevant record keeping policies.

Executive responsibilities

- The AIIU leadership team has overall responsibility for AIIU's compliance with legislative obligations relating to privacy and record keeping.
- General Manager, AIIU is responsible for operational records management within their area of responsibility. This includes ensuring that approved local business procedures for the management of records over their lifecycle are developed, implemented, maintained, and consistent with relevant policies.

Regional Manager, AIIU

- Responsible for monitoring the consistency of record keeping practices to ensure compliance with relevant information and privacy policies and legislation.

AIIU Record Keeping

As a Student Exchange Program provider registered by the VRQA, AIIU maintains appropriate record keeping arrangements. AIIU keeps records of each accepted student in the program.

AIIU's record keeping responsibilities are shared across schools and affiliated organisations.

Where a record is kept by both schools and/or any third-party partner and AIIU, the version held by AIIU is considered to be the original / source of truth. All records maintained electronically are backed up.

A retention period of temporary records, including that records for any critical incident and details of the remedial action taken will be maintained by AIIU for 3 years after the student ceases to be an exchange student.

Records will be classed as either 'Temporary' or 'Permanent':

Type of record	Action
Temporary – time expired (i.e. has been kept for the required retention period specified in the guidelines)	Destroy
Temporary – not time expired	Store the records until they are time expired
Permanent – still required for business use	Retain in work unit until business use concludes
Permanent – not required for business use	Transfer to Records & Information Archive

Sensitive records

AIIU acknowledges that a number of records which are received and stored as part of the Student Exchange Program are particularly sensitive, including passports, personal details and information handled as part of student welfare (for example, health information relating to a critical incident).

AIIU, third-party partners and schools must comply with all policies and procedures related to the handling of these records.

Updating contact details

It is particularly important for schools and third-party partners to regularly confirm student contact details in writing to AIIU.

Schools and affiliated organisations must maintain up-to-date contact information for students, parents, emergency contacts, and homestay hosts (if applicable), including name, address, email and mobile phone number, and to advise AIIU within 7 days of any changes.

Managing social media records policy & procedures

Appendix A outlines AIIU's policy to managing social media records, in order for AIIU to help meet its SEO compliance obligations.

Privacy

AIIU collects personal information about the students, parents and homestay hosts.

All personal and health information collected by AIIU as part of its Student Exchange Program is handled in compliance with AIIU's Information Privacy Policy. This policy sets out how AIIU, third-party providers and schools collect, hold, manage, use, disclose or transfer personal and health information in accordance with the Information Privacy Principles and Health Privacy Principles contained within the *Privacy and Data Protection Act 2014* (Vic) and the *Health Records Act 2001* (Vic)

Review

This policy will be **reviewed every year** and following significant incidents if they occur.

AIIU will record, review and analyse complaints, issues, concerns and safety incidents for the purpose of identifying causes and systemic failures, and to inform continuous improvement. AIIU's *Evaluation Framework: Policies, Guidelines and Programs* outlines the process by which it will do this.

In accordance with the processes outlined in its ***Engagement Overview***, AIIU will share findings and actions taken in response to relevant reviews of its policies, guidelines and programs, including those related to child safety incidents, with students, families/guardians, staff and volunteers.

Legislation

- *Public Records Act 1973* (Vic)
- *Evidence Act 2008* (Vic)
- *Freedom of Information Act 1982* (Vic)
- *Health Records Act 2001* (Vic)
- *Privacy and Data Protection Act 2014* (Vic)
- *Crimes Act 1958* (Vic)
- *Education and Training Reform Act 2006* (Vic)
- *Equal Opportunity Act 1995* (Vic)
- *VRQA Guidelines for Student Exchange Programs*

POLICY APPROVER

Ken Okamoto

General Manager, AIIU
Approved: 30 November 2024

REVIEW
This policy is to be reviewed by 30 November 2025.

Appendix A

MANAGING SOCIAL MEDIA RECORDS POLICY & PROCEDURES

INTRODUCTION

This document outlines AIIU's policy to managing social media records, in order for AIIU to help meet its SEO compliance obligations.

WHY DO I NEED TO DO THIS?

Social media tools are often used to have informal conversations, but legislative requirements still apply. The use of social media related to AIIU's student exchange program constitutes official organisational and regulatory information.

STEP 1: IDENTIFY SOCIAL MEDIA RECORDS

A social media record is a record of program activity that is freely available online. Social media records may be tweets or posts, such as your Facebook page or YouTube channel and other social networking tools, blogs, photo and video sharing and wikis.

If tweets or posts were used by someone in the program, such as an exchange student, host family, or AIIU staff member, to make an important decision, take an action or compromise the privacy or safety of an individual participating in an AIIU program, then AIIU may need to show exactly what information was posted at a specific point in time and any interactions or transactions in relation to this. Something which seems minor can be critical evidence at a later period of time.

Some social media channels are used to communicate and engage on issues that would be regarded as critical and/or high risk - they may be issues that negatively impact vulnerable individuals or communities or indeed the organisation itself.

Types of social media posts include:

•   original posts on a social media site

•   responses, if any are received, to the original post

•   relevant posts identified when monitoring social media sites

•   content republished when the content has come from elsewhere.

STEP 2: WORK OUT WHAT NEEDS TO BE MANAGED AND FOR HOW LONG

Social media records need to be kept for a period of time based on their purpose, value or impact on and within the program.

There is no requirement to keep information about absolutely everything that is tweeted and every update on your AIIU's Facebook page. Most social media records have short retention periods, and nothing more will need to be to manage them.

Sometimes, social media records may be required for Right to Information requests, or for formal inquiries such as an actual or alleged critical incident of abuse. They may also then not only be required by AIIU but also local authorities e.g. Victoria Police. These will have longer retention periods and require more intensive management.

As a general rule most social media records relating to AIIU's programs, particularly promotional, marketing or explanatory information about the organisation, its programs and activities should be be retained for only up to 3 years. Where the records pertain to something more controversial, they should be retained for at least 7 years and up to 25 years. Decisions should be made based on the risk to AIIU if the social media posts are not captured.

STEP 3: WORK OUT HOW AND WHERE TO MANAGE LONGER TERM RECORDS

A Capture Approach

- One way to capture records is to download a Twitter (X) archive, Facebook feed or YouTube archive periodically, for example, annually, monthly, or weekly, depending on volume.
- Consider capturing screenshots saved as PDF if it is important to keep a record of how a social media site looked at a particular point in time or if you need to capture a record of a specific comment in the context that it appeared (there are also commercial software tools available).
- It is important when capturing social media records that both the content and the context of the post are captured. Linking the message to the context is vital to creating a narrative in which the record may be properly understood. A person viewing the social media record must be able to follow the story of what was said, when and by whom.
- When capturing context, keep in mind that it should assist with the understanding of the message when it is viewed by a third party or at a later date. It should include at a minimum:
  - Date and time it was sent or received
  - For messages sent from someone's account: the name of the person/s that sent the message, who authorised the message, and to whom it was sent
  - For messages sent to someone's account: the account name that received the message, the person to whom it was sent, and the name used by the person who posted the message (no need to determine the sender's actual identity if not required under AIIU's privacy policy)
  - The purpose of the message.
  - The name of the social media application the message was published on.
- Social media posts should be captured as soon as possible after posting as there is no guarantee how long they will remain online.
- Timely record capture may be required for use by the AIIU leadership team, local authorities i.e. Victoria Police etc. and may support decisions made in critical situations.

- Capture frequency may occur at the end of each day or week, or other time period, as deemed appropriate. A risk assessment will help to determine how frequently posts should be captured.

<u>A Storage Approach</u>

- Methods of capture include:
  - manually saving a screenshot of the post along with information regarding its context as a Word or PDF document
  - using an automated application to capture posts.
- For any social media records, you identify as having long term or permanent value, they should be stored in a digital format that can be preserved
- Don't assume backups or storage on network drives is sufficient, they don't properly preserve the context or allow easy access.

> *A basic rule of thumb to apply is: If you need to keep it for any length of time, capture and store it.*
> *If you won't need to access it in a year or two, leave it where it is.*

WHAT STANDARDS MUST BE MET?

AIIU's approach to managing social records is based on:

- AIIU's information and records keeping and privacy policy and procedures
- VRQA SEO Record Keeping and Privacy Requirements
- Child Safe Standards
- Privacy legislation.