



AUSTRALIAN INSTITUTE of INTERNATIONAL UNDERSTANDING (AIIU) RECORD KEEPING GUIDELINES

PURPOSE

These Record Keeping Guidelines establish AIIU's framework for the creation, classification, storage, security, retention and lawful disposal of records.

The objectives are to:

- Protect student safety and welfare
- Ensure regulatory compliance
- Preserve organisational accountability
- Safeguard privacy
- Maintain accurate and auditable records

LEGISLATIVE AND REGULATORY CONTEXT

These guidelines operate in accordance with:

- The Privacy Act 1988
- The School Education Act 1999
- The Children and Community Services Act 2004
- The Working with Children (Criminal Record Checking) Act 2004
- The National Guidelines for the Operation of International Secondary Student Exchange Programs in Australia

These guidelines apply to inbound and outbound student records.

SCOPE

Applies to:

- Student records
- Host family records
- Staff and volunteer records
- Regulatory communications
- Social media records
- Digital and physical records
- Third-party documentation



ROLES AND RESPONSIBILITIES

AIIU (Organisation)

AIIU is responsible for:

- Maintaining a secure record-keeping system
- Ensuring records are complete and accurate
- Classifying records appropriately
- Monitoring retention periods
- Protecting sensitive information

Executive Management

Executive Management must:

- Oversee compliance with legislation
- Approve retention schedules
- Ensure audit readiness
- Report significant record breaches

Regional Manager

Regional Managers are responsible for:

- Ensuring local compliance with record standards
- Reviewing student welfare records
- Escalating critical incidents
- Confirming secure storage at regional level

Local coordinators

Local Coordinators must:

- Maintain accurate student welfare notes
- Document home visits and welfare checks
- Upload records promptly
- Secure any temporary paper notes

Overseas Partners/Schools

Where relevant, third-party organisations must:

- Provide required documentation promptly
- Protect confidential information
- Comply with agreed privacy obligations
- Notify AIIU of recordable incidents

AIIU retains ultimate responsibility for official SEO records.

AIIU RECORD KEEPING PROCESSES

Creation of Records

Records must be:

- Clear
- Accurate
- Objective
- Dated
- Attributable to an identifiable staff member

Welfare notes must record:

- Date
- Method of contact
- Observations
- Actions taken

Storage of Records

Digital Records

- Stored in secure password-protected systems
- Role-based access controls
- Two-factor authentication (where possible)
- Cloud providers must meet Australian security standards

Paper Records

- Locked cabinets
- Restricted access
- Shredded when disposed

CLASSIFICATION OF RECORDS

Records must be classified as either:

Permanent Records

Permanent records include:

- Student application files
- Welfare monitoring records
- Incident and Child protection reports
- Regulatory correspondence and WWC clearance records
- Host family approval documentation
- Audit reports

These records are retained indefinitely or for extended minimum retention periods consistent with child protection best practice.

Temporary Records

Temporary records include:

- Routine scheduling emails
- Non-substantive internal communications
- Draft documents
- Duplicate copies

Temporary records are retained only as long as operationally necessary.

SENSITIVE RECORDS

Sensitive records include:

- Medical information
- Mental health information
- Child protection reports
- Criminal history checks
- WWC records
- Allegations or complaints

These must:

- Be restricted to authorised personnel
- Not be shared via unsecured email
- Be clearly marked “Confidential”
- Be stored in restricted-access folders

UPDATING CONTACT DETAILS

AIU will:

- Confirm student, parent and host contact details at placement commencement
- Update records upon notification of changes
- Record date of update
- Retain historical contact information where relevant

Failure to maintain updated contact details may compromise emergency response.

MANAGING SOCIAL MEDIA RECORDS

When Records Must Be Created

Social media interactions must be recorded where:

- Allegations arise
- Bullying or harassment occurs
- Safeguarding concerns are identified
- Official communication occurs via digital platforms

Capture Process

Where relevant:

- Screenshots must be taken
- URL links recorded
- Date/time captured
- Context noted

Screenshots must be stored in secure student file.

Retention

Social media records connected to:

- Child safety
- Welfare incidents
- Complaints

are classified as Permanent records.

PRIVACY CONSIDERATIONS

All record keeping must comply with the Privacy Act 1988.

Information must only be:

- Collected for lawful purposes
- Used for intended purpose
- Shared where authorised
- Secured against unauthorised access

CROSS-BORDER DATA CONSIDERATIONS

For outbound students:

- Records may be shared with overseas partner organisations
- Only necessary information may be transferred
- Consent must be obtained where required



ACCESS TO RECORDS

Access may be granted to:

- Students (subject to age and safeguarding limits)
- Parents/guardians
- Regulatory authorities
- Law enforcement (where required)

Access requests must be documented.

DISPOSAL OF RECORDS

Temporary records must be securely destroyed.

Permanent records must not be destroyed without:

- Executive approval
- Legal review
- Confirmation no ongoing investigation exists

Secure destruction methods include:

- Cross-cut shredding
- Secure digital deletion

AUDIT AND COMPLIANCE

AIU will:

- Conduct annual internal audits
- Review file completeness
- Verify retention compliance
- Prepare documentation for WA regulatory audits

DATA BREACH RESPONSE

If a data breach occurs:

- Immediate containment
- Internal reporting
- Risk assessment
- Notification where required under law
- Incident documentation



TRAINING

All staff and coordinators will receive:

- Record keeping training
- Privacy obligations training
- Safeguarding documentation guidance

REVIEW OF GUIDELINES

These guidelines will be reviewed:

- Annually
- After any incident pertaining to this policy
- As part of continuous improvement

Guidelines last reviewed	February 2026
Approved by	General Manager
Consultation/Noting	AIU Management Team
Next scheduled review date	February 2027

Appendix 1

For a **Student Exchange Organisation (SEO) operating in Western Australia**, there is **no single universal retention period**, but retention requirements arise from child protection law, privacy law, limitation law and regulatory expectations. However, below is the **practical WA-compliant position**.

CHILD PROTECTION & ABUSE-RELATED RECORDS

Under the **Children and Community Services Act 2004** and in line with national child safety expectations, records relating to:

- Allegations of abuse
- Child protection reports
- Serious welfare incidents
- Risk assessments
- Investigations

Should be retained permanently (or for the lifetime of the organisation).

Why?

- WA has no limitation period for civil child sexual abuse claims.
- Regulatory investigations may occur many years later.
- Destruction of such records may create legal risk.

Best practice: Permanent retention.

STUDENT FILES (GENERAL WELFARE & PLACEMENT RECORDS)

Under the National Guidelines for the Operation of International Secondary Student Exchange Programs in Australia and audit expectations:

Includes:

- Application forms
- Host family approvals
- Welfare monitoring reports
- Incident records
- Regulatory notifications

Recommended WA Retention Period: Minimum 7 years after program completion, **however best practice is 7 years after the student turns 25, or longer where feasible.**



WORKING WITH CHILDREN (WWC) & SCREENING RECORDS

Under the **Working with Children (Criminal Record Checking) Act 2004**:

- Verification records must be retained during engagement.
- Expired WWC documentation should be retained as evidence of compliance at the time of placement.

Recommended: Retain screening evidence for at least 7 years after engagement ends.

FINANCIAL RECORDS

Under Commonwealth taxation law:

- Financial records must be kept for 5 years.

(Income tax and GST record requirements.)

EMPLOYMENT RECORDS

Under Fair Work requirements:

- Employee records must be kept for 7 years.

TEMPORARY/ADMINISTRATIVE RECORDS

Examples:

- Routine emails
- Scheduling messages
- Draft documents

These may be retained only as long as operationally necessary.

Recommended: 1–3 years unless attached to a student file.

SOCIAL MEDIA INCIDENT RECORDS

If linked to:

- Bullying
- Harassment
- Safeguarding
- Misconduct

These become part of the student's permanent or long-term file.



DATA BREACH & PRIVACY RECORDS

Under the **Privacy Act 1988**: Records relating to notifiable data breaches should be retained

- Destruction of student welfare records carries legal risk.
- For SEO compliance in WA, regulators generally expect:
- Conservative, child-safety-first retention periods.