# ISP Record Keeping Procedural Guidelines

## Purpose

To outline the Department of Education and Training’s (DET) record keeping arrangements for international students to comply with all relevant legislation, including the *Education Services for Overseas Students* *Act 2000* (Cth) (ESOS Act).

The [DET Records Management Policy](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/2581/policies_(corporate)%252Fdata_and_information_management%252Frecords_management_policy) provides a framework for the effective management of records in DET.

These International Student Program (ISP) Record Keeping Procedural Guidelines (Guidelines) are an approved Local Recordkeeping Procedure under the [DET Records Management Policy](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/2581/policies_(corporate)%252Fdata_and_information_management%252Frecords_management_policy). These Guidelines also complement [DET’s Information Privacy Policy](https://www.education.vic.gov.au/pages/privacypolicy.aspx), [DET’s Standard for Managing Corporate Records](https://edugate.eduweb.vic.gov.au/edrms/collaboration/KISTeam/_layouts/15/WopiFrame2.aspx?sourcedoc=/edrms/collaboration/KISTeam/RMPolicies/Records%20Management%20Standards/Consolidated%20Records%20Management%20Standard%20-%20Corporate.docx&action=default&DefaultItemOpen=1), the [Archives and Records Management Policy](https://www.education.vic.gov.au/school/principals/spag/governance/pages/archives.aspx) for schools, and the [Information and Privacy Policy](https://www.education.vic.gov.au/school/principals/spag/governance/Pages/privacy.aspx) for schools.

## Roles and responsibilities

### DET corporate and school staff

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

### Executive responsibilities

* The Secretary, DET has overall responsibility for DET’s compliance with legislative obligations relating to privacy and record keeping.
* Executive Directors, Regional Directors and Directors are Record Custodians under the [DET Records Management Policy](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/2581/policies_(corporate)%252Fdata_and_information_management%252Frecords_management_policy), 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.
* The Executive Director, Integrity, Assurance and Executive Services Division is the officer accountable for development and implementation of the Information Privacy Policy, and ongoing monitoring of compliance with this policy.

### Manager, Records and Digitisation Services

* Responsible for approving these Guidelines as a Local Recordkeeping Procedure under the [DET Records Management Policy](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/2581/policies_(corporate)%252Fdata_and_information_management%252Frecords_management_policy).

### Senior Compliance Officer, International Education Division (IED)

* Responsible for monitoring the consistency of record keeping practices to ensure compliance with the ESOS Act.

## ISP record keeping

As a provider registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS), DET maintains appropriate record keeping arrangements. Consistent with the ESOS Act, DET keeps records of each accepted student who is enrolled with DET or who has paid any tuition fees for a course provided by DET. The systems used for record keeping are set out in **Appendix 1.**

DET’s record keeping responsibilities are shared across schools and central functions of DET. The Records Matrix at **Appendix 2** provides detail on these arrangements in relation to:

* the types of records created and managed
* the systems used to manage different types of records
* who should have access to records
* how long records must be kept before destruction.

Where a record is kept by both schools and DET, the version held by DET is considered to be the original / source of truth. All ISP records maintained electronically are backed up.

Schools are audited periodically against their record keeping requirements to ensure compliance.

DET corporate staff dispose of records in accordance with the [DET Records Management Policy](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/2581/policies_(corporate)%252Fdata_and_information_management%252Frecords_management_policy). School staff dispose of records in accordance with the [Archives and Records Management Policy](https://www.education.vic.gov.au/school/principals/spag/governance/pages/archives.aspx).

### Sensitive records

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

DET and schools must comply with all policies and procedures related to the handling of these records.

### Updating contact details

In order to comply with the ESOS Act and ensure the accuracy of contact details (on CASES21, the Overseas Student Program database (OSP) and the Provider Registration and International Student Management System (PRISMS)), DET (IED) recognises that it is particularly important for schools to regularly confirm student contact details in writing.

Schools must maintain up-to-date contact information for students, parents, emergency contacts, and homestay hosts (if applicable), including name, address (in Victoria), email and mobile phone number.

In addition to ongoing updates, schools must ensure each international student completes and signs this template in the presence of the ISC every six months (ideally at the start of Term 1 and Term 3).

Schools must update any changes in contact information in CASES21 within 3 working days of becoming aware.

Completed forms must be retained by schools and placed on the student’s file for record keeping purposes. These may be required for audit purposes.

Students and parent are also required to advise school staff within 7 days if their contact details change, including who to contact in emergency situations.

## Privacy

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

All personal and health information collected by DET as part of the ISP is handled in compliance with the [School Information Privacy Policy](https://www.education.vic.gov.au/Pages/schoolsprivacypolicy.aspx) and [DET's Information Privacy Policy](http://www.education.vic.gov.au/Pages/privacypolicy.aspx). These policies sets out how DET is to 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) (PDP Act) and the *Health Records Act 2001* (Vic) (HR Act).

Under certain circumstances set out in the PDP Act and HR Act, DET may also give information obtained or received to an enforcement body for purposes set out in the ESOS Act.

As part of the ISP, DET collects and uses the information of European Union (EU) residents or citizens, who are, or will be, in the EU[[1]](#footnote-2). As a result, the European General Data Protection Regulation (GDPR) imposes additional privacy requirements in relation to this information. DET meets its GDPR obligations through ensuring compliance with the [DET Information Privacy Policy](http://www.education.vic.gov.au/Pages/privacypolicy.aspx).

## Other assistance

For further information, contact:

* [Records and Digitisation Services](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/1817/support_and_service_(corp)%252Fit%252Frecords_management%252Frecords_and_archives) on 1800 359 140 or email at [archives.records@edumail.vic.gov.au](mailto:archives.records@edumail.vic.gov.au).
* The DET Privacy Officer on +61 3 8688 7967 or email at [privacy@edumail.vic.gov.au](mailto:privacy@edumail.vic.gov.au).

## Legislation

* *Education Services and Overseas Students Act 2000* (Cth)
* *Education Services for Overseas Students Regulations 2019* (Cth)
* *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (Cth)
* *Financial Management Act 1994* (Vic)
* *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)
* *Public Administration Act 2004* (Vic)
* *Occupational Health and Safety Act 2004* (Vic)
* *Accident Compensation (Occupational Health and Safety) Act 1986* (Vic)
* *Crimes Act 1958* (Vic)
* *Education and Training Reform Act 2006* (Vic)
* *Equal Opportunity Act 1995* (Vic)
* *General Data Protection Regulation (2016/679)* (EU)

## Related documents

* [DET Records Management Policy](https://edugate.eduweb.vic.gov.au/sites/i/Pages/production.aspx#/app/content/2581/policies_(corporate)%252Fdata_and_information_management%252Frecords_management_policy)
* [DET Information Privacy Policy](https://www.education.vic.gov.au/pages/privacypolicy.aspx)
* [DET Standard for Managing Corporate Records](https://edugate.eduweb.vic.gov.au/edrms/collaboration/KISTeam/_layouts/15/WopiFrame2.aspx?sourcedoc=/edrms/collaboration/KISTeam/RMPolicies/Records%20Management%20Standards/Consolidated%20Records%20Management%20Standard%20-%20Corporate.docx&action=default&DefaultItemOpen=1)
* [School Policy (SPAG) – Health Records](https://www.education.vic.gov.au/school/principals/spag/health/pages/healthrecords.aspx)
* [School Policy (SPAG) – Archives and Records Management](https://www.education.vic.gov.au/school/principals/spag/governance/pages/archives.aspx)
* [School Policy (SPAG) – Information and Privacy Policy](https://www.education.vic.gov.au/school/principals/spag/governance/Pages/privacy.aspx)
* [Running a School Guidance (SPAG) – Records and Information Management](https://www.education.vic.gov.au/school/teachers/management/Pages/records.aspx)

## Related procedures

Nil.

## Supporting information / websites

* [School Records – Primary & Secondary Schools (PROS 01/01)](https://www.prov.vic.gov.au/recordkeeping-government/document-library/pros-0101-school-records-primary-secondary-schools)
* [Education & Early Childhood Development (PROS 10/09)](https://www.prov.vic.gov.au/recordkeeping-government/document-library/pros-1009-education-early-childhood-development)
* [Common Administrative Functions RDA (PROS 07/01)](https://prov.vic.gov.au/recordkeeping-government/document-library/pros-0701-common-administrative-functions)

## Definitions

* **DET (IED)** – Department of Education and Training – International Education Division. IED is the division in DET that administers the International Student Program in Victorian government schools. IED is not a separate entity to DET. DET is the CRICOS registered provider.
* **International students (or students)** for the purpose of this policy are defined as students participating or applying to participate in the ISP under a subclass 500 Student – Schools visa.

## Contact and maintenance officer

Portfolio Director, International Education

International Education Division

Department of Education and Training

Level 28, 80 Collins Street, Melbourne, Victoria 3000

Email: international@edumail.vic.gov.au

Phone: +61 3 7022 1000

## Authorised

Executive Director, International Education Division

Date of authorisation: 29/11/2019

**Review frequency**: This procedure will be reviewed at minimum every 24 months or when any changes arise impacting its currency, including legislative or regulation change.

Manager, Records and Digitisation Services

Date of authorisation: 15/08/2019

## Appendix 1 – Record keeping systems

### PRISMS

The Provider Registration and International Student Management System (PRISMS) is a secure Commonwealth Government system for CRICOS registered providers to issue Confirmations of Enrolment (CoE) and report changes in course enrolment required for compliance with the ESOS Act.

Information stored on PRISMS includes sensitive information including personal information, visa information and welfare information.

Only DET (IED) staff who have an operational need can access PRISMS. Schools do not have access to PRISMS under any circumstances.

Any information held in PRISMS is the source of truth for that information. DET (IED) is responsible for maintaining the currency of information on PRISMS. To ensure the currency of information maintained on PRISMS, IED is responsible for undertaking regular updates of CASES21 information into OSP, and then into PRISMS.

### CASES21

CASES21 is the administration and finance system used in Victorian Government schools for both domestic and international students.

Information held on CASES21 includes student records, reporting and attendance, financial transactions and other non-ISP information. Schools comply with the [Schools CASES21 Policy](https://www.education.vic.gov.au/school/principals/spag/infrastructure/pages/cases.aspx).

DET (IED) does not have access to edit CASES21.

### Overseas Student Program database (OSP)

The Overseas Student Program database (OSP) is an internal student management system and database maintained by DET (IED). This system contains information for all students participating in the ISP and is only accessible by DET (IED) staff. Student entries into the database are automatically conducted when a student applies to the ISP.

Supplementary information captured in this system is uploaded from CASES21, including student personal information, correspondence, and changes in visa and welfare arrangements.

This system is also used for other functions such as invoicing, case management (such as those relating to critical incidents, internal transfers, and deferrals), and monitoring of student application and enrolment status.

Only DET (IED) staff who have an operational need can access OSP. Schools do not have access to OSP.

### Student Document Manager (SDM)

SDM is a repository for documents maintained by DET (IED). As OSP does not have the ability to store documents, SDM supplements OSP by storing documents.

Only DET (IED) staff who have an operational need can access SDM. Schools do not have access to SDM.

### Oracle

Information that is stored in Oracle includes student, parent, school and agent details, and all ISP payment information for tuition and non-tuition paid, unpaid and payable.

Only DET staff who have an operational need can access Oracle. Schools do not have access to Oracle.

### IRIS

The Incident Reporting Information System (IRIS) is DET’s online incident management system. Schools log incidents through the Incident Support and Operations Centre (the 24/7 call centre for schools).

The system stores sensitive and non-sensitive information related to critical incidents. The systems sends out notifications (IRIS alerts)

Only DET staff who have an operational need can view and access IRIS. Only school staff who have an operational need can view IRIS. School staff cannot access IRIS.

### SharePoint

The SharePoint system is an internal DET repository used by DET to manage data and information that is not specific to any particular student. Examples of this information includes general reports and templates, data cleansing activity outcomes, policies, procedures and forms, and generic communication about the ISP.

DET includes controls in SharePoint so that only staff who have an operational need can access folders.

## Appendix 2 – Records creation matrix – ISP

The Records Creation Matrix below is structured around the four stages in the international student journey:

1. Pre-enrolment
2. Enrolment
3. Education
4. Exit

All records must be retained for the maximum of the periods specified in Retention and Disposal Authorities issued by the Public Records Office of Victoria:

* [School Records – Primary & Secondary Schools (PROS 01/01)](https://www.prov.vic.gov.au/recordkeeping-government/document-library/pros-0101-school-records-primary-secondary-schools)
* [Education & Early Childhood Development (PROS 10/09)](https://www.prov.vic.gov.au/recordkeeping-government/document-library/pros-1009-education-early-childhood-development)
* [Common Administrative Functions RDA (PROS 07/01)](https://prov.vic.gov.au/recordkeeping-government/document-library/pros-0701-common-administrative-functions)

For the ‘Original / Source of Truth’ record types marked in grey in the table below, the records must be kept for the greater of:

* the period in the relevant Retention and Disposal Authority (RDA)
* two years after the student ceases to be an accepted student, as per ESOS Act requirements.

| Record Type | Format  (Hardcopy / Electronic) | Storage Location  (System / Hardcopy Location) | Retained at School?  (Y / N) | Retained at Central?  (Y / N) | Original / Source of Truth | Source Template | Retention period |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. **Pre-enrolment** |  |  |  |  |  |  |  |
| Student pre-acceptance personal information | Electronic | CASES21, OSP, SDM | Yes | Yes | SDM | N/A | As per RDA |
| Any Third-Party Provider Education Agreements | Electronic / Hardcopy | SharePoint | Yes | Yes | SharePoint | Standard Contracts | As per RDA |
| Register of Third-Party Provider Education Agreements | Electronic | SharePoint | No | Yes | SharePoint | Third-Party Agreement Register | As per RDA |
| Education Agent Agreements | Electronic / Hardcopy | SharePoint | No | Yes | SharePoint | Agent Agreement | As per RDA |
| Register of education agent details | Electronic | PRISMS | No | Yes | PRISMS | N/A | As per RDA |
| 1. **Enrolment** |  |  |  |  |  |  |  |
| Personal information of accepted students who are enrolled or have paid any tuition fees | Electronic | CASES21, OSP, PRISMS | Yes | Yes | PRISMS | N/A | Greater of:   * Seven years (as per RDA), or * two years after the student ceases to be an accepted student |
| Application Form, including supporting evidence (e.g. relating to English proficiency and educational qualifications) | Electronic | SDM, OSP | Yes | Yes | SDM | N/A | As per RDA |
| Signed Written Agreements and Letter of Offer | Electronic | SDM | No | Yes | SDM | Written Agreement and Letter of Offer Template | Greater of:   * Seven years (as per RDA), or * two years after the student ceases to be an accepted student |
| Confirmation of Appropriate Accommodation and Welfare (CAAW) letter | Electronic / Hardcopy | PRISMS, SDM, School’s Student File | Yes | Yes | PRISMS | N/A | As per RDA |
| Confirmation of Enrolment (CoE) | Electronic / Hardcopy | PRISMS, SDM, School’s Student File | Yes | Yes | PRISMS | N/A | As per RDA |
| Student visa | Electronic / Hardcopy | School’s Student File, VEVO (Visa Entitlement Verification Online) | Yes | No (but accessed through VEVO) | VEVO | N/A | As per RDA |
| Copy of student’s current passport | Electronic / Hardcopy | SDM, School’s Student File, PRISMS | Yes | Yes | PRISMS | N/A | As per RDA |
| Overseas Student Health Cover membership card | Electronic / Hardcopy | School’s Student File, OSP | Yes | Yes | School | N/A | As per RDA |
| Offshore contact details of parent (if applicable) | Electronic / Hardcopy | CASES21, OSP, SDM, School’s Student File, PRISMS | Yes | Yes | PRISMS | N/A | As per RDA |
| Onshore contact details of parent or DHA approved relative (if applicable) | Electronic | CASES21, OSP, SDM, School’s Student File, PRISMS | Yes | Yes | PRISMS | N/A | As per RDA |
| Onshore contact details of homestay host (where applicable) | Electronic | CASES21, OSP | Yes | Yes | OSP | N/A | As per RDA |
| Tuition and non-tuition fees paid (including receipts of payments), unpaid and payable to DET (IED) | Electronic | Oracle | No | Yes | Oracle | N/A | Greater of:   * Seven years after end of financial year (as per RDA), or * two years after the student ceases to be an accepted student |
| Details of any DET (IED) payment plans | Electronic | OSP, SDM | No | Yes | OSP | N/A | As per RDA |
| Non-tuition fees paid, unpaid and payable to schools | Electronic | CASES21 | Yes | No | CASES21 | N/A | Greater of:   * Seven years after end of financial year (as per RDA), or * two years after the student ceases to be an accepted student |
| Written record of the school, VCAA, and DET (IED)’s decision to grant course credit and the student’s acceptance | Electronic / Hardcopy | School’s Student File, SDM | Yes | Yes | School | VCAA ‘Application for credit towards the VCE/VCAL’ form | Greater of:   * Seven years (as per RDA), or * two years after the student ceases to be an accepted student |
| Homestay Agreement | Electronic / Hardcopy | School’s Student File | Yes | No | School | Homestay Agreement Template | As per RDA |
| Homestay Profile | Electronic / Hardcopy | SDM, School’s Student File | Yes | Yes | School | Homestay Assessment and Site Visit Checklist | As per RDA |
| Initial Homestay Assessment and Site Visit Checklist | Electronic / Hardcopy | School’s Student File | Yes | No | School | Homestay Assessment and Site Visit Checklist | As per RDA |
| A copy of a Working with Children Check of all persons over 18 years of age residing or frequently residing in the homestay accommodation (where applicable) | Electronic / Hardcopy | School’s Student File | Yes | No | School | N/A | As per RDA |
| Deferment of the commencement of study requested by an overseas student, and DET (IED) decisions | Electronic | OSP, SDM | No | Yes | SDM | Change Request Form | As per RDA |
| Pre-departure checklist | Electronic / Hardcopy | School’s Student File | Yes | No | School | Pre-Departure Guide and Checklist | As per RDA |
| 1. **Education** |  |  |  |  |  |  |  |
| Proof that orientation has been conducted (signed and dated by the student and the International Student Coordinator) | Electronic / Hardcopy | School’s Student File | Yes | No | School | ISP Student Orientation Checklist | As per RDA |
| Minimum six-monthly checks of currency of student contact details | Electronic / Hardcopy | School’s Student File | Yes | No | School | ISP Student Contact Information Template | Greater of:   * Seven years (as per RDA), or * two years after the student ceases to be an accepted student |
| Minimum six-monthly Homestay Assessment and Site Visit Checklist (if applicable) | Electronic / Hardcopy | School’s Student File | Yes | No | School | Homestay Assessment and Site Visit Checklist | As per RDA |
| Homestay Register (if applicable) | Electronic / Hardcopy | SharePoint | Yes | No | School | N/A | As per RDA |
| Homestay Working with Children Check Register (if applicable) | Electronic / Hardcopy | SharePoint | Yes | No | School | N/A | As per RDA |
| Student attendance records | Electronic / Hardcopy | CASES21 (or any other student management system) | Yes | No | School | Attendance Summary Report | As per RDA |
| Suspension of enrolment requested by an overseas student, and DET (IED) decisions | Electronic | School’s Student File, OSP, SDM | Yes | Yes | SDM | Application for Temporary Suspension of Enrolment Form | As per RDA |
| DET (IED) decisions to change a student’s course duration following granting of course credit, an approved suspension, or where intervention strategies are being implemented | Electronic | School’s Student File, OSP, SDM, PRISMS | Yes | Yes | PRISMS | N/A | As per RDA |
| Attendance monitoring dashboard | Electronic | SharePoint | No | Yes | SharePoint | N/A | As per RDA |
| Records of the outcomes of assessment for all units completed and assessed | Electronic/Hardcopy | School’s Student File, CASES21 | Yes | No | School | N/A | As per RDA |
| Any school counselling, welfare, behaviour or intervention support | Electronic/Hardcopy | School’s Student File | Yes | No | School | Course Progress, Attendance and Behaviour Checklist  Course Progress, Attendance and Behaviour Meeting Template | As per RDA |
| International Student Compliance Contract and supporting evidence | Electronic/Hardcopy | School’s Student File, SDM, OSP | Yes | Yes | SDM | Compliance Contract Template | As per RDA |
| Correspondence sent to DET (IED) from school / parent / agent | Electronic | SDM, OSP | No | Yes | OSP | N/A | As per RDA |
| Correspondence sent to school from DET (IED) | Electronic/Hardcopy | School’s Student File, OSP | Yes | Yes | OSP | N/A | As per RDA |
| Correspondence sent to school from parent / agent | Electronic/Hardcopy | School’s Student File | Yes | No | School | N/A | As per RDA |
| School Holiday Student Location Register (including details of any travel undertaken by student during school holiday periods, including contact details and parent/homestay provider approval) | Electronic/Hardcopy | SharePoint, SDM | Yes | Yes | School | School Holiday Student Location Register | As per RDA |
| Details of any complaints handled by the school, including written record of outcome and reasons | Electronic | School’s Student File | Yes | No | School | N/A | As per RDA |
| Details of any complaints and appeals handled by DET, including written record of outcome and reasons | Electronic | SDM, OSP, SharePoint | No | Yes | OSP | N/A | As per RDA |
| Records supporting the student’s participation in Work Experience | Electronic / hardcopy | Schools’ Student File | Yes | No | School | N/A | As per RDA |
| Information regarding critical incidents and any remedial action taken | Electronic/Hardcopy | CASES21, OSP, School’s Student File, IRIS | Yes | Yes | IRIS | N/A | These records should be kept indefinitely until further RDA guidance is issued. |
| 1. **Exit** |  |  |  |  |  |  |  |
| Student’s requests for transfer and evidence of DET (IED)’s assessment and outcome | Electronic/Hardcopy | School’s Student File, SDM, OSP, PRISMS | Yes | Yes | PRISMS | Transfer Form | Greater of:   * Seven years (as per RDA), or * two years after the student ceases to be an accepted student |
| Cancellation of enrolment (student initiated or provider-initiated) | Electronic/Hardcopy | SDM, OSP, PRISMS | Yes | Yes | PRISMS | N/A | As per RDA |
| Records of any refunds paid by DET (IED) | Electronic | OSP, SDM, Oracle | No | Yes | OSP | N/A | As per RDA |
| Issuance of qualifications | Electronic/Hardcopy | School’s Student File, VCASS (Victorian Curriculum Assessment Software System) | Yes | No | VCASS | N/A | As per RDA |

1. These are referred to as ‘data subjects’ under the GDPR [↑](#footnote-ref-2)