



RECORDS MANAGEMENT AND FREEDOM OF INFORMATION POLICY

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Related Documents:

- IAPUC Bylaws (IAPUC/GOV/2025-001, Version 1.2.3)
- IQA Certification Archives and Data Retention Management Regulations (IAPUC/ARCH/2025-001, Version 1.0.0)
- IQA Document Preparation Specification (IAPUC/GOV/DOC-2025-001, Version 1.1.0)
- IAPUC Privacy Policy (IAPUC/LEG/PRV/2025-001, Version 1.0.1)
- IAPUC Digital Security and Privacy Regulations (IAPUC/DS/2025-001, Version 1.0.1)
- Code of Conduct and Conflict of Interest Policy for Board Members (IAPUC/GOV/ETH/2025-001, Version 1.0.0)
- Whistleblower Protection Policy (IAPUC/ETH/WBP/2025-001, Version 1.0.0)
- Policy Development and Revision Procedures (IAPUC/GOV/POL/2025-001, Version 1.0.0)

Document Control

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Distribution List

- IAPUC Board of Directors (all members)
- Accreditation Decision Committee (ADC)
- IAPUC Secretariat
- All IAPUC Staff Members
- All IAPUC Members (for information)
- IAPUC Legal Counsel
- IAPUC Regional Offices

Table of Contents

Preamble

Part I: General Provisions (Articles 1–5)

Part II: Records Management Framework (Articles 6–11)

Part III: Access to Records – Freedom of Information (Articles 12–17)

Part IV: Exemptions and Restrictions (Article 18)

Part V: Procedures for Information Requests (Articles 19–23)

Part VI: Appeals and Review (Article 24)

Part VII: Monitoring and Compliance (Articles 25–27)

Part VIII: Review and Amendment (Article 28)

Annex A: Record Classification and Retention Schedule

Annex B: Information Request Form

Annex C: Record Destruction Authorisation Form

Preamble

The International Association of Private Universities and Colleges (IAPUC) is committed to the highest standards of transparency, accountability, and good governance. As a global quality assurance body serving private higher education institutions, IAPUC generates, receives, and maintains a wide range of records—including governance documents, membership files, accreditation records, financial statements, correspondence, and operational data. These records are valuable assets that document the Association's history, decisions, and activities.

Effective records management is essential to:

- Ensure that records are created, maintained, and disposed of in a systematic

and lawful manner;

- Preserve the integrity and authenticity of records as evidence of IAPUC's activities;
- Support operational efficiency and decision-making;
- Ensure compliance with legal, regulatory, and archival requirements;
- Protect confidential and sensitive information;
- Facilitate access to information by members, stakeholders, and the public, consistent with the principles of transparency and accountability.

At the same time, IAPUC recognises the importance of freedom of information—the right of individuals and organisations to access information held by the Association, subject to legitimate exceptions. This Policy balances the public interest in transparency with the need to protect privacy, confidentiality, and the effective functioning of IAPUC.

The *IQA Certification Archives and Data Retention Management Regulations* (IAPUC/ARCH/2025-001) establish the detailed technical requirements for archiving, retention periods, and disposal. This *Records Management and Freedom of Information Policy* (the “Policy”) provides the overarching framework for the creation, organisation, access, and disclosure of records, as well as the procedures for handling requests for information.

This Policy is adopted pursuant to Article [X] of the IAPUC Bylaws and shall be read in conjunction with the related policies and regulations.

Part I: General Provisions

Article 1: Purpose and Scope

1.1 This Policy establishes the framework for:

- The management of all records created, received, and maintained by IAPUC in the course of its activities;
- The rights of members and the public to access information held by IAPUC;
- The procedures for making and processing information requests;
- The exemptions and restrictions that apply to disclosure.

1.2 This Policy applies to:

- All records and information held by IAPUC, regardless of format (paper, electronic, audio-visual, or other);
- All IAPUC staff, Board members, committee members, and volunteers who create, handle, or manage records;
- All IAPUC members and external stakeholders who seek access to information.

1.3 This Policy does not apply to:

- Personal data of individuals, which is governed by the *IAPUC Privacy Policy* (IAPUC/LEG/PRV/2025-001);
- Records of member institutions that are not in IAPUC's custody;
- Information that is already publicly available through IAPUC's website or publications.

Article 2: Definitions

For the purposes of this Policy:

2.1 “Record” means any information (in any form) created, received, or maintained by IAPUC in the course of its business, including but not limited to documents, correspondence, emails, databases, financial records, accreditation files, meeting minutes, photographs, audio- visual materials, and electronic data.

2.2 “Records Management” means the systematic control of the creation, maintenance, use, retention, and disposal of records.

2.3 “Information Request” means a formal request by an individual or organisation for access to records held by IAPUC.

2.4 “Applicant” means the person or entity making an information request.

2.5 “Exempt Information” means information that is not subject to disclosure under this Policy due to confidentiality, privacy, security, or other legitimate grounds.

2.6 “Records Officer” means the designated IAPUC staff member responsible for the day- to- day management of records and information requests.

Article 3: Guiding Principles

3.1 Transparency: IAPUC shall be open and transparent in its operations, providing access to information to the greatest extent possible.

3.2 Accountability: Records shall be maintained to demonstrate IAPUC's compliance with its obligations and to support accountability.

3.3 Integrity: Records shall be authentic, reliable, and complete, and shall be preserved in a manner that ensures their integrity.

3.4 Proportionality: Access to information shall be provided in a manner proportionate to the resources available and the legitimate interests at stake.

3.5 Protection: Confidential and sensitive information shall be protected from unauthorised access and disclosure.

Article 4: Relationship to Other IAPUC Instruments

4.1 This Policy shall be interpreted in harmony with:

- The IAPUC Bylaws (IAPUC/GOV/2025-001);
- The *IQA Certification Archives and Data Retention Management Regulations* (IAPUC/ARCH/2025-001);
- The *IQA Document Preparation Specification* (IAPUC/GOV/DOC-2025-001);
- The *IAPUC Privacy Policy* (IAPUC/LEG/PRV/2025-001);
- The *IAPUC Digital Security and Privacy Regulations* (IAPUC/DS/2025-001);
- The *Whistleblower Protection Policy* (IAPUC/ETH/WBP/2025-001).

4.2 In the event of any inconsistency, the Bylaws shall prevail.

Article 5: Records Officer

5.1 The Secretariat shall designate a Records Officer, who shall be responsible for:

- Implementing and maintaining this Policy;
- Overseeing the records management system;
- Providing guidance to staff on records management practices;
- Processing information requests and ensuring timely responses;
- Coordinating with the Secretariat and the Board on records matters;
- Reporting annually to the Board on the implementation of this Policy.

Part II: Records Management Framework

Article 6: Creation and Capture of Records

6.1 Records shall be created and captured in a timely manner, documenting IAPUC's activities and decisions accurately and completely.

6.2 Electronic records shall be stored in a secure, backed-up system, with appropriate metadata to ensure discoverability.

6.3 Records shall be created in accordance with the *IQA Document Preparation Specification* (IAPUC/GOV/DOC-2025-001) for official documents.

Article 7: Classification and Organisation

7.1 Records shall be classified according to a standard classification scheme, which shall include:

Category	Description
Governance	Bylaws, policies, Board minutes, committee records

Membership	Membership applications, correspondence, directories
Accreditation	IQA files, review reports, accreditation decisions, self- study reports
Financial	Budgets, financial statements, invoices, receipts, audit files
Human Resources	Staff records, contracts, performance evaluations
Operations	Correspondence, project files, event records, publications
Legal	Contracts, agreements, legal opinions, intellectual property

7.2 The Records Officer shall maintain a current classification scheme and provide guidance to staff.

Article 8: Retention and Disposal

8.1 Records shall be retained for the periods specified in the *IQA Certification Archives and Data Retention Management Regulations* (IAPUC/ARCH/2025-001) and in Annex A to this Policy.

8.2 The retention periods shall be based on:

- Legal and regulatory requirements;
- Operational needs;
- Historical and archival value;
- Privacy considerations.

8.3 Records that have reached the end of their retention period shall be:

- Reviewed for archival value;
- Disposed of in a secure and confidential manner (e.g., shredding, secure deletion);
- Documented in a Record Destruction Authorisation Form (Annex C).

8.4 No record shall be destroyed if it is subject to a pending information request, audit, investigation, or litigation.

Article 9: Storage and Security

9.1 Records shall be stored in a secure environment, protecting them from loss,

damage, unauthorised access, and destruction.

9.2 Electronic records shall be:

- Stored on secure servers with appropriate access controls;
- Backed up regularly in accordance with the Digital Security and Privacy Regulations;
- Protected from cyber- threats and unauthorised access.

9.3 Paper records shall be stored in locked cabinets or secure rooms, with access limited to authorised personnel.

Article 10: Access to Records within IAPUC

10.1 Staff and Board members shall have access to records necessary for the performance of their duties, subject to:

- The principle of “need- to- know”;
- Compliance with confidentiality and data protection requirements;
- Any restrictions imposed by the relevant policies.

10.2 Access to sensitive records (e.g., accreditation files, personal data, legal advice) shall be restricted to authorised individuals.

10.3 The Records Officer shall maintain an access log for restricted records.

Article 11: Transfer of Records

11.1 When a staff member leaves IAPUC, they shall transfer all records in their possession to the Secretariat or to the Records Officer.

11.2 When a Regional Office or representative ceases operations, records shall be transferred to the Secretariat in accordance with these Regulations.

Part III: Access to Records – Freedom of Information

Article 12: General Principle

12.1 IAPUC is committed to transparency and shall provide access to information held by the Association, subject to the exemptions set out in Article 18.

12.2 Access to information shall be provided:

- Through proactive disclosure (e.g., publishing policies, reports, and meeting minutes on the website);
- Through reactive disclosure (responding to specific information requests).

Article 13: Proactive Disclosure

13.1 The following information shall be published on the IAPUC website and made freely available:

- IAPUC Bylaws and governance documents;
- IAPUC policies, regulations, and standards;
- IAPUC Strategic Development Plan;
- Annual reports and financial statements (audited);
- Directory of accredited institutions (with appropriate details);
- IQA certification manual and related documents;
- Membership information and fee structures;
- Board meeting summaries (with appropriate redactions).

13.2 The Secretariat shall ensure that the proactive disclosure information is kept up- to- date and accessible.

Article 14: Reactive Disclosure – Information Requests

14.1 Any person (member or non- member) may submit a request for access to information held by IAPUC, in accordance with these procedures.

14.2 Requests shall be submitted in writing (including by email) using the Information Request Form (Annex B) or a clear written statement.

14.3 Requests shall:

- Provide sufficient detail to identify the records sought;
- Include the applicant's name and contact information;
- Specify the format in which the information is requested (e.g., electronic copy, paper copy).

Article 15: Scope of Information Covered

15.1 This Policy covers all records held by IAPUC, regardless of format or location, subject to the exemptions in Article 18.

15.2 Records that are not in IAPUC's custody, or that are held by third parties on IAPUC's behalf but not under IAPUC's control, are not covered.

Article 16: Fees and Charges

16.1 Access to information shall generally be provided free of charge, except for:

- Requests that require significant staff time or resources (over 5 hours of work),

for which a reasonable fee may be charged (e.g., search and retrieval costs);

- Requests for copies (e.g., printing, photocopying, scanning), for which a cost-recovery fee may be charged;
- Requests for multiple or voluminous records.

16.2 The Records Officer shall inform the applicant of any fees before proceeding with the request.

16.3 Fee waivers may be granted where:

- The information is in the public interest;
- The applicant is unable to pay;
- The request is from an IAPUC member.

Article 17: Timing of Responses

17.1 The Records Officer shall acknowledge receipt of a request within **5 working days**.

17.2 A substantive response shall be provided within **20 working days** of receipt of the request.

17.3 If the request is complex or voluminous, the Records Officer may extend the time by a further **20 working days**, but shall inform the applicant of the extension and the reasons.

17.4 If the request is refused, the applicant shall be informed of:

- The reasons for refusal (including the specific exemption applied);
- The right to appeal (see Article 24).

Part IV: Exemptions and Restrictions

Article 18: Exempt Information

18.1 The following categories of information are exempt from disclosure and shall not be provided:

Exemption	Description
Personal Data	Information about identifiable individuals, where disclosure would breach data protection laws or the <i>IAPUC Privacy Policy</i> .
Confidential Information	Information provided to IAPUC in confidence, including accreditation materials, peer review

	reports, and proprietary information.
Legal Advice and Privilege	Information subject to legal professional privilege or relating to ongoing or potential litigation.
Internal Deliberations	Preliminary drafts, internal communications, and records of decision- making processes, where disclosure would inhibit candid discussion or prejudice good governance.
Security and Safety	Information that would compromise the security of IAPUC's operations, systems, or personnel.
Commercial Sensitivity	Information that would prejudice the commercial interests of IAPUC or its partners.
Accreditation Deliberations	Detailed deliberations of the Accreditation Decision Committee (ADC) and peer review panels, where disclosure would compromise the integrity of the accreditation process.
Disciplinary Matters	Information relating to disciplinary investigations and proceedings, except for final decisions that are made public.
Whistleblower Reports	Information related to whistleblower reports, including the identity of the whistleblower and the content of the report.
Third- Party Confidentiality	Information provided by third parties (e.g., member institutions, applicants) that is designated as confidential.

18.2 Exemptions shall be applied with due consideration to the public interest. In some cases, a partial disclosure may be possible (e.g., redacting sensitive parts while releasing the remainder).

18.3 Where information is partially exempt, the Records Officer shall consider whether redaction can be applied to release the non- exempt portions.

Part V: Procedures for Information Requests

Article 19: Submission of Request

19.1 Requests shall be submitted to:

- Email: foi@iapuc.org (dedicated address)
- Mail: IAPUC Secretariat, [Address], marked "Freedom of Information Request"
- Online: Via the IAPUC website form (if available).

19.2 The request shall:

- Clearly identify the records sought;
- Provide the applicant's name, address, and contact information;
- Indicate the preferred format.

Article 20: Receipt and Acknowledgment

20.1 The Records Officer shall record the request in the FOI register, assign a reference number, and acknowledge receipt within **5 working days**.

20.2 The acknowledgment shall include:

- The reference number;
- The expected date of response;
- Information about fees, if any.

Article 21: Processing of Request

21.1 The Records Officer shall search for the requested records and assess them for exemptions.

21.2 The Records Officer shall:

- Consult with relevant staff or departments, where necessary;
- Consult with the Legal Counsel, where exemptions or complex issues arise;
- Redact exempt information where possible.

21.3 The Records Officer shall prepare a response, which shall either:

- Provide the requested information (with or without redactions);
- Refuse the request, citing the applicable exemption(s).

Article 22: Response

22.1 The response shall be in writing and shall include:

- The decision (grant, partial grant, or refusal);
- The records provided (if any);
- The reasons for any refusal, with reference to the specific exemption;
- Information on the right to appeal.

22.2 If the requested records are voluminous, the Records Officer may arrange for

the information to be provided in instalments.

Article 23: Transfer of Requests

23.1 If the request relates to records that are held by another organisation or that are more appropriately handled by another IAPUC body, the Records Officer may transfer the request (with the applicant's consent) or provide advice on where to apply.

23.2 The applicant shall be informed of the transfer.

Part VI: Appeals and Review

Article 24: Appeals

24.1 An applicant who is dissatisfied with the response to their information request may appeal the decision.

24.2 The appeal shall be submitted in writing to the Secretary- General within **30 days** of the date of the response.

24.3 The appeal shall state:

- The reference number of the request;
- The reasons for dissatisfaction;
- Any additional information supporting the appeal.

24.4 The Secretary- General shall review the decision and provide a written response within **30 days** of receipt of the appeal.

24.5 If the applicant remains dissatisfied, they may:

- Appeal to the Independent Appeals and Arbitration Committee (in accordance with the *IQA Certification Appeal, Complaint and Dispute Resolution Regulations*);
- Seek external remedies (e.g., through courts or ombudsman) where applicable.

Part VII: Monitoring and Compliance

Article 25: Monitoring

25.1 The Records Officer shall maintain a register of information requests, including:

- The date of receipt;
- The applicant;
- The records sought;
- The decision;

- The date of response;
- Any appeal.

25.2 The register shall be reviewed annually by the Secretariat and reported to the Board.

Article 26: Compliance

26.1 All IAPUC staff and Board members shall comply with this Policy.

26.2 Failure to comply may result in disciplinary action in accordance with relevant policies.

26.3 The Records Officer shall provide training and guidance to staff on records management and FOI obligations.

Article 27: Reporting

27.1 An annual report on the implementation of this Policy shall be submitted to the Board, including:

- The number of information requests received;
- The outcomes (granted, partially granted, refused);
- Any appeals and their outcomes;
- Challenges encountered and recommendations for improvement.

Part VIII: Review and Amendment

Article 28: Review and Amendment

28.1 This Policy shall be reviewed by the Board at least once every **five (5) years**.

28.2 Amendments may be proposed by the Board, the Secretariat, or the Records Officer, and shall be adopted by a two-thirds majority of the Board.

28.3 All amendments shall be documented in the Document Control table, with a new version number reflecting the revision.

Annex A: Record Classification and Retention Schedule

(For detailed retention periods, refer to the IQA Certification Archives and Data Retention Management Regulations, IAPUC/ARCH/2025-001. The following is a summary.)

Record Category	Retention Period	Disposal Action
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Governance Records (Bylaws, policies, Board minutes, strategic plans)	Permanent	Archive
Accreditation Files (self- study reports, review reports, decisions)	10 years after accreditation decision	Review for archival value
Membership Records (applications, renewals, correspondence)	7 years after membership ends	Destroy
Financial Records (invoices, receipts, bank statements, annual financial statements)	7 years (financial statements permanent)	Destroy (financial statements archive)
Human Resources Records (staff files, contracts, performance evaluations)	7 years after employment ends	Destroy
Correspondence and Operational Files	5 years	Destroy (or archive if significant)
Legal Records (contracts, legal opinions)	10 years after contract ends	Archive (or destroy as per legal advice)
Information Request Files (FOI requests)	5 years	Destroy
Whistleblower Reports	15 years (or permanent if significant)	Confidential archive
Audio- Visual Materials (events, interviews)	10 years	Archive if significant

Annex B: Information Request Form

IAPUC INFORMATION REQUEST FORM

Date: _____

Applicant Name: _____

Organisation (if applicable): _____

Contact Address: _____

Email: _____

Phone: _____

Request Details

1. Description of the Information Requested

Please describe the records you are seeking as clearly and specifically as possible.

2. Format Preferred

- ☐ Electronic copy (email / download)
- ☐ Paper copy (post)
- ☐ Other (please specify): _____

3. Purpose of Request (optional)

4. Declaration

I declare that the information provided is accurate and that I understand that IAPUC may charge reasonable fees for processing this request.

Signature: _____

Date: _____

Please submit this form to foi@iapuc.org or by mail to the IAPUC Secretariat.

Annex C: Record Destruction Authorisation Form

IAPUC RECORD DESTRUCTION AUTHORISATION FORM

Date: _____

Records Officer: _____

1. Records to be Destroyed

Record Description	Date Range	Volume/Quantity	Retention Period Expired?

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2. Destruction Method

- ☐ Shredding (paper)
- ☐ Secure deletion (electronic)
- ☐ Incineration
- ☐ Other: _____

3. Authorisation

I certify that:

- The records listed above have reached the end of their retention period;
- They are not subject to any pending legal or information request;
- They have been reviewed for archival value.

Authorised by (Records Officer): _____

Signature: _____ Date: _____

4. Destruction Witness (if required)

Name: _____

Signature: _____ Date: _____

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Document Version 1.0.0 – Page 1 of 14

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