

Records and Data Management Policy

1 Purpose & Objective

- 1.1 This policy outlines the principles that guide the IIBIT Education Group's (IIBITEG) approach to the management of its corporate records and data assets.
- 1.2 The objective of the policy is to ensure that physical and digital records and data asset management is a strategic process that assists the Group in meeting its strategic objectives and its regulatory obligations.

2 Scope

- 2.1 This policy applies to all entities in Australia governed by IIBITEG.
- 2.2 Records included in the scope of this policy include all documents that provide objective evidence of activities performed, events occurred, decisions made, results achieved, or statements made in relation to individual students, cohorts of students, or corporate business and governance activities. Records include but are not limited to legal contracts and agreements, electronic communication, letters, forms, teaching materials including content delivered via the Learning Management System, memos, drawings, letters, podcasts, videos, photographs and transcripts of verbal communication.
- 2.3 Data included in the scope of the policy includes the following.
 - a) Corporate data: facts as text, numbers, graphics, images, sound or video captured as an outcome of IIBITEG's day-to-day operation. It can include, but is not restricted to: staff data, student data, financial data, facilities data, curriculum data, etc.
 - b) Master data: data about IIBITEG entities that provide context for business transactions.
 - c) Personal data: data where a person's identity is apparent, or can reasonably be ascertained.

3 Policy

- 3.1 IIBITEG recognises corporate records and corporate, master and personal data as key organisational assets that support operational activities and inform quality improvement, risk management and strategic planning.
- 3.2 Systematic and accurate record keeping and data management and storage are fundamental to requirements for administrative transparency and accountability.
- 3.3 Personal privacy and risk mitigation are central considerations in relation to the storage, dissemination, use, retention and disposal of corporate records and corporate, master and personal data.
- 3.4 Corporate records and corporate, master and personal data are restricted to authorised staff with a business process requirement.
- 3.5 Applications for access to corporate records and corporate, master and personal data for

the purposes of scholarship and research are subject to requirements of the Academic Policy and the Human Research Ethics Procedure.

Records Management

- 3.6 IIBITEG records must be authentic, reliable, usable, complete, and unaltered.
- 3.7 Records must be linked to metadata such as format and business and documentary context.
- 3.8 Accurate and systematic records management enables IIBITEG to account for decisions and actions by providing essential evidence in the form of records. Thus records must be maintained on systems or infrastructure that is capable of meeting records management standards and legislative requirements.
- 3.9 A system must be assessed for compliance with records standards before it is implemented or before records are migrated to or from the system.
- 3.10 A major change to an existing system must be assessed for compliance.
- 3.11 Throughout their full retention period, records must be actively managed and organised to preserve the privacy of individuals, context, usability and ease of retrieval.
- 3.12 Records must be retained in accordance with the Records Retention and Disposal Authority appended to this policy.
- 3.13 Records must be destroyed at the date specified in the Records Retention and Disposal Authority, using secure and permanent methods unless there is a pending or anticipated legal action or business use.
- 3.14 Records are only available to third parties in accordance with legal and regulatory requirements within the constraints of security, confidentiality, privacy and archival access conditions.

Data Management

- 3.15 Corporate data should be collected only when known and documented uses and value exist either to support:
 - a) IIBITEG's operational activities and to inform quality improvement, risk management and strategic planning; and/or
 - b) to meet external report requirements.
- 3.16 IIBITEG acknowledges that data quality issues relating to the accuracy, completeness, duplication and/or currency of data, or changes to business processes impacting on data collection and recording have the potential to impact negatively on the data's ability to inform the requirements outlined in clause 3.15. Thus, data quality and integrity are central to IIBITEG's approach to data capture, validation, processing and storage.
- 3.17 Processes for data capture, validation and processing should generally be automated. Where this is not possible business processes must ensure the maintenance of reliable data and maximise data quality.

- 3.18 Collection of accurate and complete data is the responsibility of all members of IIBITEG staff.
- 3.19 For accountability and stewardship, all data must have a defined Data Steward responsible for accuracy, integrity, and security of data. Data Stewards are responsible for ensuring that all legal, regulatory, and policy requirements are met in relation to specific data assets.
- 3.20 Personal data held by IIBITEG is collected and managed in a responsible, secure manner.
- 3.21 All data must be protected from unauthorised access and modification and be stored in a system endorsed for the storage of corporate data.
- 3.22 Approved applications to dispose of data must ensure that disposal is undertaken securely.
- 3.23 Data is only available to third parties in accordance with legal and regulatory requirements within the constraints of security, confidentiality, privacy and archival access conditions.

4 Roles and Responsibilities

- 4.1 The IIBITEG Board of Governance is responsible for the oversight of this policy.
- 4.2 The Senior General Manager (Operations) is responsible for:
- implementation of this policy and maintenance of the Records Retention and Disposal Authority;
 - ensuring compliance with this policy and related procedures;
 - ensuring that staff are adequately notified of the existence of this policy and the related procedures;
 - benchmarking IIBITEG policy and standards with those adopted elsewhere in the tertiary sector; and
 - the monitoring of information available from the review of records relating to the implementation of this policy.

5 Definitions

ADMINISTRATIVE METADATA	means data that provides information to help manage a resource, such as when and how it was created, file type and other technical information, and who can access it
CORPORATE DATA	means facts such as text, numbers, graphics, images, sound or video captured as an outcome of IIBITEG's day-to-day operation. It can include, but is not restricted to: staff data, student data, financial data, facilities data, curriculum data, etc.
DATA ADMINISTRATOR	means the person responsible for the administration of the data and monitoring of the quality of data capture

DATA STEWARD	means the person responsible for the accuracy and integrity, of data
DESCRIPTIVE METADATA	means the description of a resource for purposes such as discovery and identification. It can include elements such as title, abstract, author, and keywords.
LEARNING MANAGEMENT SYSTEM	means the software application for the administration, documentation, tracking, reporting and delivery of IIBITEG programs and courses
MASTER DATA	means data about IIBITEG entities that provide context for business transactions
METADATA	means data that provides information about other data. IIBITEG references three distinct types of metadata: descriptive metadata, structural metadata, and administrative metadata
PERSONAL DATA	means data where a person’s identity is apparent, or can reasonably be ascertained.
QUANTITATIVE DATA	means data that can be counted (discrete data) or measured (continuous data)
QUALITATIVE DATA	means non-numerical, categorical data that be arranged or coded into categories
RECORDS	means documents that provide objective evidence of activities performed, events occurred, decisions made, results achieved, or statements made in relation to individual students, cohorts of students, or corporate business and governance activities. Records include but are not limited to legal contracts and agreements, electronic communication, letters, forms, teaching materials including content delivered via the Learning Management System, memos, drawings, letters, podcasts, videos, photographs and transcripts of verbal communication
STRUCTURAL METADATA	means the data that describes the internal structure or representation of a data asset

6 Associated Information

Related Documents	<ul style="list-style-type: none"> • IIBITEG Strategic Plan • IIBIT-AHE Academic Plan • Financial Framework • Records Management Procedure • Data Management Procedure
Related Legislation	<ul style="list-style-type: none"> • TEQSA Act 2011 • Higher Education Standards Framework • Standards for Registered Training Organisations • National Code of Practice for Providers of Education and Training to Overseas Students 2018 • Work Health and Safety Act 2012 (SA),

	<ul style="list-style-type: none"> Work Health and Safety Act 2011 (NSW) and the Work Health and Safety Regulation 2017(NSW)
Date Approved	23 March 2018
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Date of Review	March 2023
Approval Authority	IIBITEG Board of Governance
Document Administrator	Senior General Manager (Operations)
PinPoint DocID	360

7 Change History

Version Control	Version 1.1	
Change Summary	V1.1 1-May-19	Update responsibility from SGMAC to SGMO and administrative updates, <i>Note that Records Retention and Disposal Authority still requires update to new roles</i>

Records Retention and Disposal Authority

Record	Record Description	Period of Retention	Authority to Dispose
'At Risk'	Records relating to students identified 'At Risk'.	Two years after graduation	General Manager (Academic)
Accounts Payable	Records documenting expenditure. Creditors can be internal staff or external parties. Includes petty cash, purchase and sale invoices, receipts, credit card receipts, cash disbursement, cheques, ex-gratia payments, and cab charge vouchers.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Accounts Receivable	Records documenting payments made to IIBITEG. Includes requests for payments, IIBITEG purchase and sale invoices and receipt books.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Accreditation	Records associated with processes involved in negotiating the content and structure of academic programs to comply with industry and professional standards.	Ten years after accreditation expires	Senior General Manager (Academic and Compliance)
Ad hoc Student Support	Records documenting the provision of ad hoc individual academic support to students. Includes checking of individual assignments and dissertations for language issues, and any editorial assistance provided.	Two years after graduation	General Manager (Academic)
Annual Financial Statements	Annual financial statements and associated background documentation. Includes balance sheets, operating statements, cash flow statements and accompanying notes, consolidated financial statements, statements of financial position.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Assessment and Examination Content	Records documenting the development of assessment examination content. Includes working papers, draft examination question papers etc.	One year after last action completed	General Manager (Academic)
Assessment Materials	Essays and assignment papers or other assessable materials not collected by students. Includes materials and content submitted by students to the Learning Management System (LMS).	One year after results published	General Manager (Academic)
Assessment Moderation	Moderation of student assessment tasks, and any evaluation undertaken of the suitability of the assessment task. Includes examiners' reports, marking sheets, moderation reports, and marking guidance provided to staff.	Two years after the end of the appeal period	General Manager (Academic)
Bank Details	Records documenting the administration of IIBITEG bank accounts and use and reconciliation of corporate purchasing cards. Includes deposit records, bank statements, bank reconciliation statements, investment and dividend statements, records documenting the use of credit cards, cheque books, cheque butts and	Ten years after completion of the financial year in which the record was created	Manager (Finance)

Record	Record Description	Period of Retention	Authority to Dispose
	cancelled cheques.		
Boards and Committees	Records associated with the operation of boards of governance, governance committees, operational committees and associated working groups.	Permanent	Nil
Branding	Records associated with the use of IIBITEG brand. Includes style manuals and Brand Guidelines System.	Dispose after reference use ceases	Senior General Manager (Operations)
Budget	Budget estimates produced for internal use by IIBITEG. Includes budget allocation decisions, allocation of funds, estimates of expenditure, calculations, superseded revisions, costing of annual expenditure, additional estimates.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Budget Variations	Records documenting spending progress or revenue collection against allocations within budget estimates. Includes variations to budgets, interim budget reports.	Two years after completion of the financial year in which the record was created	Manager (Finance)
Campus and asset management	Records associated with acquisition, operation, lifecycle management and servicing of the real estate, assets and infrastructure of IIBITEG. Includes: real estate, buildings and fittings, equipment, IT and network infrastructure, machinery, furniture and vehicles.	Ten years from the date the last action	Senior General Manager (Operations)
Claims	The activities involved in managing and responding to compensation claims brought against IIBITEG.	Ten years after the claim is resolved	CEO
Compliance	Records associated with IIBITEG's compliance with mandatory or optional accountability, fiscal, legal, regulatory or quality standards.	End of completion of two external compliance review cycles as relevant to the documentation	Senior General Manager (Academic and Compliance)
Conduct of Examinations	Records documenting the arrangements for the conduct of examinations. Includes provisional and final examination timetables, appointment of examiners, printing and distribution of examination papers and script books, booking of exam venues.	One year after last action completed	General Manager (Academic)
Conferral of Awards	Records associated with the conferral of an award.	Permanent	Nil
Conflict of Interest	Records associated with declared conflicts of interest.	Ten years after the declaration	CEO
Contract/ Agreements/MoU	Final signed version of agreements and Memoranda of Understanding not under seal or of small scale significance to IIBITEG. Includes records documenting the development, formulation and execution of these agreements and MOUs.	Ten years after the contract/agreement/MoU has expired	CEO
Corrective Actions	Records documenting the receipt and response to individual enquiries or the outcome of formal processes which result in recommended changes to IIBITEG policy or procedures.	Permanent	Nil
Course/Program Delivery (Administrative)	Records documenting administrative arrangements for the delivery of programs/courses. Includes timetables for lectures, subjects, lecture theatres, semesters, tutorials, classroom and theatre allocations and bookings.	Dispose after reference use ceases	General Manager (Academic)

Record	Record Description	Period of Retention	Authority to Dispose
Course/Program Delivery (Content)	Records providing a master set of courses/programs approved.	Permanent	Nil
Course/Program Development	Records documenting the planning, development, structure and content of a course/program. Includes approval documentation, alteration and abolition of courses/programs.	Permanent	Nil
Data (Scholarship)	Data and datasets created as part of scholarship activities.	Permanent	Nil
Data Administration	Records relating to the migration of data between electronic systems and from one electronic medium to another. Include the migration and back up media data due to version upgrade. Includes strategies for the migration and quality assurance checks to confirm accuracy of the migration process.	One year after migration	Senior General Manager (Operations)
Debt Recovery	Records documenting debt recovery activities.	Ten years after completion of the financial year in which the record was created	Manager (Finance)
Department Plans	Final version of Department level business or academic plans.	Five years after year of applicability	Senior General Manager (Academic and Compliance) OR Senior General Manager (Operations)
Depreciation	Records documenting formal depreciation of IIBITEG assets.	Ten years after disposal of the asset	Senior General Manager (Operations)
Determination of Fee/Charges/Fine Liability	Records documenting the determination, assessment and notification of liability of other fees and related charges, such as late charges. Includes amenities and services fees, waivers of late fees, refunds, fee debtors, fee write offs, fee credit notes, payment extensions, fee ledger, library fines.	Ten years after notification sent	Senior General Manager (Operations)
Determination of student refunds	Records documenting the determination, assessment and notification of student refunds.	Ten years after notification sent	Manager (Finance)
Donations	Records documenting the receipt of monetary gifts that result in, for example, the creation of scholarships and prizes, the provision of scholarship or library support or other ongoing value to IIBITEG.	Permanent	Nil
Enquires (General Administration)	Records documenting the receipt and response to individual enquiries which require routine responses on IIBITEG actions, policy or procedures. Includes form letters, standard responses, admission and prospective student enquiries.	Two years after last action completed	Senior General Manager (Operations)
Enquiries (Academic)	Records documenting the processes and procedures involved in the handling of enquiries and feedback relating to academic programs.	Ten years after last action completed	General Manager (Academic)
Enrolment	Records documenting the enrolment and re-enrolment of students into a	Ten years after completion or	Senior General Manager

Record	Record Description	Period of Retention	Authority to Dispose
	course/program of study (filed separately to the student file). Includes enrolment forms, deferment, leave of absence, withdrawals, exemptions, credits, variations to enrolment, Recognition of Prior Learning (RPL), etc.	abandonment of, or withdrawal, discontinue or termination	(Operations)
Examination Script Books	Examination Script Books - used and unused.	1 year after results published	General Manager (Academic)
External Audit	Final report of an external financial audit.	Ten years after the audit is completed	Manager (Finance)
External Audit (General)	Final report of an external audit report. Excluding Financial Audit.	Ten years after the audit is completed	Senior General Manager (Academic and Compliance)
Financial Advice	Records relating to the provision or receipt of detailed and significant financial advice to executive or senior management regarding financial investments, incurred obligations and financial reporting requirements. Includes detailed and high level advice on the application of specific accounting standards and policies, financial or annual reporting legislation and accounting treatments.	Permanent	Nil
Gifts and Benefits	Records documenting the acceptance or refusal of gifts and benefits.	Ten years after completion of the financial year in which the record was created	Senior General Manager (Operations)
Government Funding	Records documenting funding received from State or Commonwealth government.	Permanent	Nil
Graduation	Records relating to the administration of graduation ceremonies.	Two years after the event	Senior General Manager (Operations)
Human Research Ethics	Records documenting applications for the assessment of the use of humans in scholarship and research. Includes application, supporting documentation (including information sheet for participants), assessment, decision (approval, amendment, rejection or conditional approval), and annual reporting process. Includes records of liaison with the external Human Research Ethics Committee.	Twenty years after last action completed	Senior General Manager (Academic and Compliance)
Human Resources (Appointments)	Records documenting successful applications for appointments which form part of an employee`s consolidated employment history. Includes letters of offer and acceptance and confirmation of appointment, reappointment, conditions of appointment, statement of duties, curriculum vitae, referees` reports. Attach to staff file.	Permanent	Nil
Human Resources (Induction)	Records documenting staff attendance at induction courses.	Two years	Senior General Manager (Operations)
Human Resources (Recruitment)	Records documenting the candidate identification and selection process including recruitment campaigns. Includes make up of interview panels and the interview	Two years after the last action is complete	Senior General Manager (Operations)

Record	Record Description	Period of Retention	Authority to Dispose
	and referee questions.		
Human Resources (Remuneration – ancillary payments)	Records documenting the payment of allowances to employees. Includes overtime, first aid, clothing and travelling allowances.	Ten years after payments	Senior General Manager (Operations)
Human Resources (Remuneration –salary and wages)	Records documenting the processing of payment of salaries to personnel. Includes payroll documentation not filed on an employee’s personnel file, group certificates, employment declaration forms.	Ten years after completion of the financial year in which the record was created	Senior General Manager (Operations)
Human Resources (Security Checks)	Records documenting security checks (vetting) carried out as part of pre-engagement, pre-employment and pre-appointment checks, or periodic reviews. Includes checks carried out by police authorities in the relevant jurisdictions.	Permanent	Nil
Human Resources (Staff Development)	Records documenting staff development activities and attendance at same.	End of completion of two external compliance review cycles as relevant to the documentation	Senior General Manager (Operations)
Human Resources (Termination)	Records documenting the termination of staff. Includes resignation, retirement, dismissal, death, redundancy, retrenchment and dispensations of services of temporary personnel.	Ten years after the last action is completed	Senior General Manager (Operations)
Human Resources (Unsuccessful Applications)	Records documenting unsuccessful applications for appointments. Includes unsuccessful applications for continuing and non-continuing positions.	Six months after the appointment has been filled	Senior General Manager (Operations)
Industrial Relations	Records documenting the management of industrial action involving large numbers of staff, or where the provision of services to students and/or staff is substantially compromised, or where the action establishes an industrial relations precedent. Includes strikes, bans, lock-outs and other industrial actions which sets precedents.	Permanent	Nil
Insurance	Records documenting issuance and payment of insurance premiums. Includes health, property, motor vehicle, public and product liability, accident, travel, professional indemnity, malpractice insurance. Includes industrial special risk, certificates of currency, liability questionnaires, actuary briefs.	Ten years after the policy expires	Manager (Finance)
Investment	Records documenting investments undertaken by IIBITEG Includes buying, selling, dividends, maturities, short term and long term investments, short term deposits, equities.	Ten years after the investment matures	Manager (Finance)
Joint Ventures and Collaboration	Records associated with activities related to engagement and joint ventures with other institutions, government agencies, private sector organisations and community groups. Activities may include initial contact, liaison, information sharing, mutual support and collaboration.	Permanent	Nil

Record	Record Description	Period of Retention	Authority to Dispose
Legal Advice	Records documenting requests for legal advice and subsequent responses from lawyers and panel law firms relating to matters of major public interest or controversy, industrial issues, , matters which are precedent setting or matters resulting in significant changes to IIBITEG`s policies. Includes Copyright Act, Copyright Regulations.	Permanent	Nil
Marketing	Records documenting the development, approval, implementation and administration of designs for IIBITEG logos, marketing materials, letterhead, stationery and publications (including websites) incorporating the corporate brand or image.	End of completion of two external compliance review cycles as relevant to the documentation	Senior General Manager (Operations)
MetaData	Master control records for IIBITEG recordkeeping systems. Includes archival management systems, registers and indexes.	Permanent	Nil
Orientation	Records documenting transition and orientation activities and programs designed to provide new and existing students with the opportunity to become familiar with the institution, meet other students, and prepare for study. Includes induction material prepared by specific areas of the institution.	End of completion of two external compliance review cycles as relevant to the documentation	Senior General Manager (Operations)
Periodic Reports	Periodic reports produced on recurring activities. Includes interim progress reports addressing performance against strategic and operational plans and reports that are not required for the purposes of meeting legislative objectives.	Five years	CEO
Policy	Final, approved versions of policies.	Permanent	Nil
Position Descriptions	Records documenting the creation, variation, abolition, transfer or reclassification of positions and assigned duties.	Ten years after position or assigned duties have been abolished or altered	Senior General Manager (Operations)
Prizes and Scholarships	Records documenting the establishment and management of prizes, scholarships and awards, and the investment of associated funds. Includes evidence of the payment to successful recipients, establishment-foundation papers, recipient register.	Permanent	Nil
Procedure	Final, approved versions of procedures.	Ten years from the date the procedure is superseded	Senior General Manager (Academic and Compliance)
Quality Assurance	Records documenting the analysis and reporting associated with quality assurance (subject/unit, course/program, cohort monitoring and review. Includes management reports, governance reports as well as external reporting to the Commonwealth. Includes external referencing and benchmarking.	Ten years	Senior General Manager (Academic and Compliance)
Reasonable Adjustment/Disability	Records documenting the implementation of a disability support plan or similar, through the provision of reasonable adjustments made for students with	Two years after graduation	General Manager (Academic)

Record	Record Description	Period of Retention	Authority to Dispose
Support	disabilities or specific needs. Includes timetabling of resources, equipment and staff required to make these adjustments.		
Reference material	Records sent to IIBITEG for information/interest.	Dispose after reference use ceases	Discretion of individual members of staff
Risk Management	Records documenting the processes associated with strategies for the management of risks. Includes risk assessments, risk registers, treatment schedules and action plans.	Ten years after last action completed	CEO
Schedule of Course/Program fees	Schedule of fees and charges.	Ten years after conclusion of the academic year the schedule relates to	Senior General Manager (Operations)
Space Management	Records documenting the allocation of buildings, offices or workspaces to departments, individual staff, students or vendors.	Five years after the relocation of space	Senior General Manager (Operations)
Staff Behavioural or Academic Misconduct	Records associated with the management of discipline or academic-professional misconduct processes, including investigations and charges. Includes reports, investigations, representations, records of disciplinary action taken and inquiry records.	Fifteen years after the last action is completed	Senior General Manager (Operations)
Strategic and Operational Plans	Final version of strategic and operational corporate and academic plans.	Permanent	Nil
Strategic Asset Management	Records associated with strategic asset management.	Five years after year of applicability	Senior General Manager (Operations)
Student Admissions	Records documenting admissions, applications and selection process to a course or program of study, regardless of outcome.	Two years after commencement date	Senior General Manager (Operations)
Student Behavioural or Academic Misconduct	Records associated with the management of discipline or academic-professional misconduct processes, including investigations and charges. Includes reports, investigations, representations, records of disciplinary action taken and inquiry records.	Fifteen years after the last action is completed	Senior General Manager (Academic and Compliance)
Student Complaints	Records documenting formal complaints.	End of completion of two external compliance review cycles as relevant to the documentation	Senior General Manager (Academic and Compliance)
Student Counselling	Records documenting the provision of support and assistance to students by a professional counsellor. Includes client records, appointment schedules.	Ten years after last attendance or access on behalf of the student	General Manager (Academic)
Student Grievances	Records documenting formal grievance.	Fifteen years after last action completed	Senior General Manager (Academic and Compliance)
Student Support	Records documenting the provision of programs and activities for extra-curricular	Two years after graduation	General Manager (Academic)

Record	Record Description	Period of Retention	Authority to Dispose
	academic assistance to students. Includes provision of information, planning and review, lesson plans, tutors.		
Subject/Unit delivery	Subject resources and material used in course/program delivery. Includes subject outlines, study guides, readings, self-assessment exercises, audio-visual teaching aides, reading lists, assignment lists, textbook lists and lecture notes (hard copy and LMS).	Ten years from date of the end of the teaching period in which the subject was delivered	General Manager (Academic)
Submissions	Final versions of submissions on issues directly relating to the IIBITEG's functions and/or concerning public or national interest issues. Includes records documenting the development of submissions.	Permanent	Nil
Taxation	Records documenting the administration of taxation. Includes administration of Goods and Services Tax (GST), Fringe Benefits Tax (FBT), travel diaries, travel receipts, Capital Gains Tax, recipient created tax invoice agreements, tax returns.	Five years after completion of the financial year in which the record was created	Manager (Finance)
Unsatisfactory Progress	Records relating to students identified as making unsatisfactory course/program progress.	Two years after graduation	General Manager (Academic)