

Records and Data Management Policy

Purpose

1. This Policy outlines the principles that guide the management of corporate records and data assets at Global Higher Education (GHE) in accordance with Domain 6 (Governance and Accountability) of the *Higher Education Standards Framework (Threshold Standards) 2021* and relevant legislation.

Scope

2. This Policy applies to all GHE staff and all data and records in all formats.
3. 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.
4. Data included in the scope of the Policy includes:
 - a) corporate data - facts as text, numbers, graphics, images, sound or video captured as an outcome of GHE's day-to-day operations. It can include, but is not restricted to staff data, student data, financial data, facilities data, and curriculum data.
 - b) master data - data about GHE entities that provides context for business transactions.
 - c) personal data - data where a person's identity is apparent or can reasonably be ascertained.

Definitions

5. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

Suite documents

6. This Policy is linked to the following procedures:
 - a) Records and Data Management Procedure - Records;
 - b) Records and Data Management Procedure - Data.

Policy

Principles

7. GHE 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.
8. Systematic and accurate record keeping, and data management and storage are fundamental to requirements for administrative transparency and accountability.

9. 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.
10. Corporate records and corporate, master and personal data are restricted to authorised staff with a business process requirement.

Records management

11. GHE records must be authentic, reliable, usable, complete, and unaltered.
12. Records must be linked to metadata such as format, and business and documentary context.
13. Accurate and systematic records management enables GHE 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.
14. A system must be assessed for compliance with records standards before it is implemented or before records are migrated to or from the system.
15. A major change to an existing system must be assessed for compliance.
16. Throughout their full retention period, records must be actively managed and organised to preserve the privacy of individuals, context, usability and ease of retrieval.
17. Records must be retained in accordance with the Records Retention and Disposal Authority appended as Schedule One to the Records and Data Management Procedure - Records.
18. 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.
19. 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

20. Corporate data should be collected only when known and documented uses and value exist to:
 - a) support GHE's operational activities;
 - b) inform quality improvement, risk management and strategic planning;
 - c) meet external reporting requirements.
21. GHE 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 20. Thus, data quality and integrity are central to GHE's approach to data capture, validation, processing and storage.
22. 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.
23. Collection of accurate and complete data is the responsibility of all members of GHE staff.
24. 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.
25. Personal data held by GHE is collected and managed in a responsible, secure manner.
26. All data must be protected from unauthorised access and modification and be stored in a system endorsed for the storage of corporate data.
27. Approved applications to dispose of data must ensure that disposal is undertaken securely.

28. 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.

Associated information

Related Internal Documents	<p>Records and Data Management Procedure - Data Records and Data Management Procedure – Records Records and Data Management Procedure – Records: Schedule One - Records Retention and Disposal Authority Academic Progress Policy Admissions Policy Assessment Policy Enrolment Policy Financial Framework Governance Framework Human Resources Framework Privacy Policy Quality Assurance Policy Risk Management Policy Strategic Plan Student Complaints, Grievances and Appeals Policy Student Disability Policy Student Diversity and Equity Policy Student Sexual Assault and Sexual Harassment Policy Teaching and Learning Plan Glossary of Terms</p>
Related Legislation, Standards and Codes	<p><i>Tertiary Education and Quality Standards Agency Act 2011</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> TEQSA Guidance Notes: <i>Corporate Governance, Version 2.4, Academic Governance, Version 2.3, Monitoring and Analysis of Student Performance, Beta Version 1.0</i> <i>Education Services for Overseas Students Act 2000</i> <i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i> <i>Freedom of Information Act 1991</i> <i>Information Privacy Principles (IPP)</i> <i>State Records Act 1998 (NSW)</i> <i>State Records Act 1997 (SA)</i></p>
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Change history

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	23-July-20	V1.1 Administrative updates
	29-Nov-21	V1.2 updated for HESF 2021
	5-Oct-23	V1.3 administrative updates following TEQSA registration

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