



## Records Management, Data and Information Security Policy

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<b>Related Policy/Procedure:</b>	➤ Privacy Policy		

# Records Management, Data and Information Security Policy

## Purpose

This Policy outlines how Lyons College will deal with data collection and the retention, security and destruction of records.

## Scope

This Policy applies to all Lyons College students, staff, contractors, agents or service providers.

## Definitions

**Access** means the approval of the ability to read, copy, or query data

**Data** means information, resources, and other records that fit into one of the following categories:

1. **Public Access** - data that is publicly available and is unlimited in access to all students, staff, and the general public such as the Lyon's public website.
2. **Internal Data** - data used and accessed only by Lyons College administration staff; not to be used by external sources without prior approval.
3. **Internal Protected Data** - data that is only accessible by the staff members that are required to use it in order to complete their assigned duties at Lyons College.
4. **Internal Restricted Data** - secure data that is to be kept confidential; specialized authorization must be given to anyone wishing to access this type of data.

**Data Leader** means the person in charge of protecting, distributing, destroying and maintaining any one specific source or group of data. A person who has direct line management of a Data Leader can make decisions and take actions on behalf of their subordinate.

**Information Technology (IT)** means the use of systems (especially computers and telecommunications) for storing, retrieving, and exchanging information. Education IT services include services and systems such as Learning Management Systems, Student Management Systems, e-libraries, student cards and printers.

**Open Educational Resources (OER)** means an aspect of IT infrastructure that includes teaching and learning materials freely available online for everyone to use, whether an instructor or student.

**Learning Management System (LMS)** means a software application for the administration, documentation, tracking, reporting and delivery of courses or training programs, a form of e-learning. Lyons College currently uses Moodle as it's LMS.

**Record** means any information, in any format (electronic, paper, image) that is created, received, used or maintained by Lyons College.

**Security** means data is being kept safe using the following guidelines:

1. Controlling access
2. Validation
3. Finding, reporting, and repairing any issues related to data integrity
4. Physical and technological security

**Student Data** means any record, information or data collected and/or retained by Lyons College. Student Data may include, but is not limited to, the following:

- The student's personal details
- Whether the student has identified themselves as being of Aboriginal and/or Torres Strait Islander heritage
- The citizenship of the student and/or country of birth
- The student's passport and visa details
- The student's ID sized photo
- Information on the course a student is enrolled in
- The students contact details including residential and/or postal address, phone number and email address
- Records of the students' academic results at Lyons College
- Records relating to the students' enrolment
- Records of the students' progression and completion
- Records of awards of qualifications to the student

**Student Management System (SMS)** means a software application used to manage student data. This includes students' personal information, their contact details, records of their enrolment, progression, completion and award of qualifications. Lyons College currently uses Meshed as the SMS.

## Policy

Lyons College staff are to abide by the following guidelines at all times to ensure the safety and security of all data connected to Lyons College.

1. Lyons College is the sole owner of all data. No one individual will ever be in complete control of any type of data as it is associated with Lyons College.
2. All Lyons College staff perform the essential role of record keeping.
3. All sources of data must have someone who is in charge of keeping up the quality and security of that information. That person for the purposes of this policy shall be known as the Data Leader. The Data Leader should also make sure that all the policy principles outlined in this document are appropriately being followed in terms of using the data.
4. The Data Leader in charge of any piece of data is responsible for allowing the access and distribution of that specific set of data.
5. The Data Leader will have the responsibility of determining whether or not any individual should be granted access to a piece of data that is otherwise considered to be protected or restricted. When the Data Leader does not have the ability to grant access alone, they must work

together with their supervisor or the appropriate academic staff before permission can be given to access the data.

6. The Data Leader should take into account the reason for the data access request along with what the data will be used for after access has been granted. This policy refers to Table 1.0 Data Access and Disposal Requirements for Various Data Sources that provides the access and approval levels for the various data sources.
7. The Data Leader must make sure that all the appropriate steps are properly completed to ensure that records are complete and are as accurate as possible:
  - a. Plan and Design data collection/records
  - b. Capture and Develop data collection/records
  - c. Organize, Store, and Protect data /records
  - d. Apply
  - e. Monitor and Review
  - f. Improve and/or Discard
  - g. Repeat
8. All data users are responsible for making sure that the appropriate steps and guidelines are followed when accessing data to ensure the value and reliability of the information remains intact and useful to future data users.
9. All data records must be kept current. This is to include updates done at every step, in both audible and visible formats.
10. Data that is collected must be done so because of the value it adds to Lyons College and the community members of the Lyons College. Data must be collected in a manner consistent with Lyons College's *Privacy Policy*
11. Removal, management, and recording of data should only be done when it is to complete tasks related to Lyons College's needs and in accordance with Lyons *Privacy Policy*
12. The use of any data for personal use is always prohibited. Before any data other than public data is used, collected, or shared there must be prior approval given by the Data Leader or Lyon College's Chief Executive Officer. Where the data is to be collected used or shared for an academic purpose, approval may be given by the Data Leader or suitable academic staff member. This is to ensure that the security and safety of the data are never at risk either intentionally or unintentionally.
13. Electronic safeguards must be in place for all data stored on electronic sources. Hardcopies must also be stored in a locked drawer or any other manner that ensures that each is protected from access by unauthorised individuals.
14. All data should be disposed of properly, hard copies and electronic sources (such as hard drives and flash drives) will be disposed of in secure destruction bins.
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#### Record Retention

1. All hardcopy data and records may be retained or archived for up to seven years.

2. All electronic Student Data is to be retained permanently.
3. All student assessments are to be retained for 6 months from the date of the assessment being assessed, and maintain sufficient evidence of an award being issued or otherwise.

Please see the below *Table 1.0 Data Access and Disposal Requirements for Various Data Sources*, which provides the disposal requirements to various data sources.

<b>Version</b>	<b>Date</b>	<b>Resolution</b>	<b>Comments</b>
V1.0	21/08/2019	20190821/XX	Initial policy created
V1.2	20/06/2023	20230620/07	Update key personal and other minor changes

## Registers

Lyons College is required to maintain certain information in the form of registers. Below are the various registers that Lyons College will maintain and update. Generally, a register will have a Policy or Procedure where the requirement is outlined. All registers will be created and maintained electronically. Registers will have access restricted as set out in the Table 1.0 Data Access and Disposal Requirements for Various Data Sources.

The Policy and/or Procedure will nominate the person required to update and maintain the register. The Register Owner is the person who is responsible for that register. The Register Updater is someone, apart from the Register Owner, who has the authority to update and add new register entries.

This is not a conclusive list of all Registers maintained by Lyons College.

Register	Policy/Procedure	Register Owner	Register Updater
Complaints Register	Academic Integrity and Academic Misconduct Policy Academic Integrity and Academic Misconduct Procedure Non-Academic Integrity and Academic Misconduct Policy Non-Academic Integrity and Academic Misconduct Procedure Staff Complaints and Appeals Policy Staff Complaints and Appeals Procedure Student Complaints and Appeals Policy Student Complaints and Appeals Procedure	CEO	Dean CAO
Academic Misconduct Register	Academic Integrity and Academic Misconduct Policy Academic Integrity and Academic Misconduct Procedure	Dean VET Manager	Head Academic Programs Course Coordinator
Non- Academic Misconduct Register	Non-Academic Integrity and Academic Misconduct Policy Non-Academic Integrity and Academic Misconduct Procedure	CEO	Dean VET Manager CAO
Critical Incident Register	Critical Incidents and Business Continuity Policy	CEO	Dean CAO VET Manager
Conflict of Interest Register	Conflict of Interest Policy	CEO	CEO
Delegations Register	Delegations Policy	CEO	CEO
Assurance Register		CEO	CEO

Register	Policy/Procedure	Register Owner	Register Updater
Risk Register	Risk Management Policy	CEO	CAO, CEO,Dean

**Table 1.0 Data Access and Disposal Requirements for Various Data Sources**

<b>Data Source</b>	<b>Data Type</b>	<b>Systems</b>	<b>Data Leader</b>	<b>Disposal Requirements</b>
Open Educational Resources	Public Access		Not Applicable	Not Applicable
Lyons College website	Public Access		Not Applicable	Not Applicable
Student enrolment data	Internal	Hardcopies and electronic copies of Forms Electronic data in Meshed	Dean CAO	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained permanently
Student progression and completion data	Internal	Hardcopies and electronic copies Electronic data in Meshed	Dean CAO	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained permanently
Student qualification and award data	Internal	Hardcopies and electronic copies Electronic data in Meshed	Dean CAO	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained permanently
Student feedback and survey information	Internal	Hardcopies and electronic copies of Forms Electronic data in Meshed	Dean CAO	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained permanently
<b>Curriculum material</b>				
Course delivery material: outlines, study guides, reading guides	Internal Protected	Hardcopies Electronic copies on secure network server Moodle	Dean Course Coordinator	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained indefinitely
Course guides – course descriptions, requirements, prerequisites, content and outcomes	Internal Protected	Hardcopies Electronic copies on secure network server Moodle	Dean Course Coordinator	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained indefinitely
Assessments – administration arrangements	Internal Restricted	Hardcopies Electronic copies on secure network server Moodle	Dean Course Coordinator	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained indefinitely
Examination questions – master set of questions	Internal Restricted	Hardcopies Electronic copies on secure network server	Dean Course Coordinator	Hard copies to be securely destroyed within seven years Electronic copies and data retained indefinitely
<b>Registers</b>	<b>Data Type</b>	<b>Systems</b>	<b>Data Leader</b>	<b>Disposal Requirements</b>
Complaints Register	Internal Restricted	Stored on secure network server	Dean CAO	Electronic copies and data retained indefinitely
Academic Misconduct Register	Internal Restricted	Stored on secure network server	Dean VET Manager CAO IT Manager	Electronic copies and data retained indefinitely
Non- Academic Misconduct Register	Internal Restricted	Stored on secure network server	Dean VET Manager CAO IT Manager	Electronic copies and data retained indefinitely
Critical Incident Register	Internal Restricted	Stored on secure network server	CEO Dean CAO IT Manager	Electronic copies and data retained indefinitely



Conflict of Interest Register	Internal Restricted	Stored on secure network server	CEO CAO	Electronic copies and data retained indefinitely
Delegations Register	Internal Restricted	Stored on secure network server	CEO	Electronic copies and data retained indefinitely
Policies and Procedures	Public Access Internal Internal Protected Internal Restricted	Stored on secure network server Novacore on secure network server	CEO CAO Dean CAO	Electronic copies and data retained indefinitely
Corporate Documents (Plans, Insurance Policies, Legal Advice etc.)	Public Access Internal Internal Protected Internal Restricted	Hardcopies Stored on secure network server Novacore on secure network server	CEO Dean CAO	Hard copies securely destroyed within seven years when electronic copies exist Electronic copies and data retained indefinitely