

Records Management, Retention and Disposal Policy

Navitas Limited
ACN 109 613 309



Document

Document Name	Records Management, Retention and Disposal Policy
Responsibility	Chief Technology Officer
Brief Description	This Records Management, Retention and Disposal Policy (" Policy ") sets out the global approach of Navitas Limited and its affiliated group companies (together the " Company ") relating to the management, retention and disposal of records and data.
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Version Control

Date	Version No.	Summary of Changes	Reviewer Name and Department/Office
18/02/2018	1.0	First version of document	General Manager Quality, Risk and Compliance
13/03/2019	1.1	Additional retention information added in Learning & Teaching (Appendix) for records relating to withdrawals and/or graduation outcomes.	General Manager Quality, Risk and Compliance

Related Documents

Name	Location
Information Classification Policy	Policy HUB
Privacy Management Overview	Policy HUB

Name	Location

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1 Purpose and Scope

1.1 Introduction

This Records Management, Retention and Disposal Policy ("**Policy**") sets out the global approach of Navitas Limited and its affiliated group companies (together the "**Company**") relating to the management, retention and disposal of records and data.

1.2 Purpose

The Company is a professional organisation, and relevant users are expected to understand how to handle records and documents and to understand record retention and disposal guidelines. This Policy has been prepared in accordance with all relevant legislative requirements, protocols and principles. It therefore sets out how the Company complies with relevant legal standards and regulations.

1.3 Scope

The Company collects, stores, processes, transfers and disposes of a range of personal data. This Policy applies to all data collections across all facets of the Company's operations inclusive of:

- Services and support
- Marketing and recruitment operations
- IT
- HR
- Finance
- Risk and Compliance
- Learning and teaching process
- Management of relationships with our suppliers
- University partners
- Joint venture partners and agents

The Policy covers collection of information from students and staff, corporate, financial and workforce information where one or more of the following conditions prevail:

- Data collection is used to meet strategic business, operational or legislative requirements
- Government authorities e.g. immigration and border agencies, has a need for the information
- The data collection contains personal information
- The data is collected as part of reporting to government, regulatory authorities or professional organisations

2 Policy Statement

2.1 Key Terms

- a) A record is a document or other data that is regarded as complete and unchangeable. It may exist as paper, as a scanned image or electronically.
- b) A document is information, stored on paper, as a scanned image, or electronically, that may be subject to revision.
- c) A Company record means any recorded information in any format (e.g. electronic, paper, photographic, scanned) created or received by staff of the Company in the course of conducting their normal daily duties and responsibilities.

- d) ISO 15489 (BS ISO 15489-1:2001) is the international standard on records management.
- e) "Records management" addresses the life cycle of records, i.e., the period of time that records are in the custody of the organisation. The life cycle usually consists of three stages:
1. Creation or receipt
 2. Maintenance and use
 3. Disposition
- f) Tools for maintaining and using records include:
- File plans
 - Indexes
 - Controlled vocabularies
 - Taxonomies
 - Data dictionaries
 - Access and security procedures
- g) Document management is the process whereby an organisation is able to manage their documents in an electronic format through a system such as a controlled document management system (CDMS). Document Management includes the ability to restrict access to certain documents or groups of documents to only authorised users. Along with security controls, these technologies enable users to be granted different levels of access.

2.2 Key Objectives

- a) The Company operates in a global environment in which the importance of managing a vast array of information, in an increasingly regulated operating environment, has become a business critical priority.
- b) The role of Regulators such as the Tertiary Education Quality and Standards Agency (TEQSA), the Australian *Privacy Act 1988*¹, the General Data Protection Regulation (GDPR) in the UK and EU and the Canadian *Personal Information Protection and Electronic Documents Act* (PIPEDA) to name but a few of the many, has increased along with the volume of information being managed. As a result the purpose and primary objectives of this policy are to facilitate and protect effective:
- business practice
 - regulatory compliance
 - management of the Company's' information assets
 - current practice records management
 - decision making support and intelligence

¹<https://www.legislation.gov.au/Details/C2016C00888> (TEQSA Act 2011);
<http://www.teqsa.gov.au/teqsa-contextual-overview-hes-frameworkHESF> (HESF 2015);
<https://www.legislation.gov.au/Details/C2016C00935> The ESOS Act 2000 (The ESOS Act 2000);
<https://www.legislation.gov.au/Details/C2016C00979> (The Privacy Act 1988);
<https://www.dlapiper.com/en/canada/insights/publications/2015/06/canadas-new-privacy-laws/> (Canadian PIPEDA)
<https://gdpr-info.eu/> (General Data Protection Regulation GDPR UK/EU)

- c) The Company predominately utilises electronic means for capturing and storing information to support its business processes and for transacting its business.
- d) The Company's strategy is to utilise, as far as possible, technological solutions for the management of records, in order to meet record keeping compliance obligations, enhance operational efficiency, better manage risk, support accountability and maintain corporate memory.
- e) The Company creates, stores, manages and maintains full and accurate records of its activities, including outsourced, contracted or cloud-based activities.
- f) All areas of the Company's operations must keep records in accordance with this policy, on matters such as recruitment, admission, learning and teaching, student and staff engagement, administrative operations e.g. finance, IT, health and safety, copyright and all related commercial activities.
- g) The Company uses records to:
 - underpin efficient and effective operations
 - support accountability, regulatory compliance and management of risk
 - preserve its corporate memory to reduce reliance on human memory and manage the risk of staff movement
- h) The Company takes a whole-of-enterprise approach to the management of information and records and therefore all staff are responsible for:
 - creating, capturing, managing and disposing of records as part of their work related duties
 - being aware of their responsibilities for protecting personal and confidential information when creating, sharing, accessing, storing and disposing of records
 - completing the relevant record-keeping induction and training modules\

2.3 Underlying Principles

- a) The processes involved in gathering, managing and using information underpin successful business operations.²
- b) Managing records efficiently supports compliance and accountability.
- c) Each record has a lifecycle that needs to be monitored and audited regularly.
- d) An efficient records management process ensures that decisions are supported with relevant information.
- e) Comprehensive records are required for business transparency, legislative compliance, accountability and cultural purposes.
- f) Efficient records management and comprehensive records are important in effective governance.
- g) Effective and efficient records management is critical in order to assure all stakeholders that their privacy is secure and protected (see [Australian Privacy Principle 11 'security of personal information'](#)).
- h) Records are different from documents.
- i) Records cannot be modified or deleted except in controlled circumstances, they have retention controls and they are arranged in a structure.

² Gates, B "How you gather, manage and use information will determine whether you win or lose"
<http://www.azquotes.com/quote/689364>

- j) Document management applies specifically to the management of discreet documents and images throughout their lifecycle; typical functionality includes acquisition, organisation, versioning, access control, and archiving.
- k) Content management focuses on the management of the data within a document, typically a web document.

2.4 Records Management Lifecycle (see figure 1 below)

- a) The Company has implemented the Information Lifecycle Management (ILM) approach to the management of information in storage systems that include electronic devices and systems.
- b) Managing information through the ILM approach enables the Company to monitor and effectively manage its strategic and operational resources and its regulatory compliance obligations.
- c) The Company regards the data collection phase (creation) as the most critical phase because in managing this phase appropriately, the potential to collect inadequate and/or excessive data that is not fit for purpose intended is reduced.
- d) Data is collected in an ethical manner taking into consideration the rights and privacy of individual data subjects.
- e) Consent is obtained from individual data subjects when collecting their personal information.
- f) The integrity of the data collected is preserved, protected, and stored in a secure environment (physical and electronic).



Figure 1: Five Steps to Managing Records and Information Lifecycle

2.5 Retention and Disposal

- a) The Company adheres to a Retention and Disposal Schedule, which was formulated to align with the Australian Privacy Act 1988 (Registered 25 October 2016) and the GDPR requirements.
- b) Local protocols are established to accommodate particular local requirements, but all local protocols must continue to align with the policy and be approved in advance of implementation by the Company's Policy Manager.
- c) The schedule outlines many different types of records, which span the entire operations of the Company. The schedule further itemises the length of time that the record(s) will be stored before disposal.
- d) All records must be disposed of in a manner that protects the security and preserves the integrity of Personal Information contained in the document/s.

2.6 Storage

2.6.1 On-site records

- a) The Company maintains a range of physical records on various sites globally, including:
 - Active student files for all students who are currently enrolled³
 - Inactive student files for the previous trimester
 - Active and inactive student files for future trimesters
 - Inactive student files for the previous trimester
 - Current HR and staff personnel files
 - Current Administrative records
 - Financial records
 - Internal Audit and Compliance records
 - Regulatory reports
- b) Once records are deemed to be finalised, they may be moved to a secure off-site storage facility.

2.6.2 Off-site records (hard copy)

- a) When deciding to move records off-site, the responsible operational area will consider issues such as security, cost, space and level of accessibility required. Some operational areas will systematically move records to secure off-site storage facilities, e.g. student administration moving graduated student files.
- b) The transfer of paper documents to electronic documents through secure scanning processes is also an option for storage.

2.6.3 Electronic Records

- a) The Company currently stores all electronic copies of documents on appropriate hardware. The primary drive is generally categorised by operational area. This drive is periodically reviewed and files that are

³ The Company is moving toward an electronic filing system for all student and personnel files, thereby greatly reducing the current requirement for off-site storage and the administrative labour cost.

deemed to have been superseded or temporary are either archived in accord with the Retention and Disposal Schedule (see Appendix 1) or disposed of under secure conditions.

- b) The Company outsources the storage of electronic records to Cloud Service Providers such as Microsoft (Singapore) and Amazon (globally).
- c) The Company stores all data in accord with the specifications as set out in the Information Classification Policy.

2.7 Security

- The Company focuses security of data and its storage around the stringency of prevailing data protection legislation and regulation. The designation of the UK's ICO as the chosen *Supervisory Authority* for the UK/EU data storage, aligns with the robust nature of the UK's data protection legislation and GDPR compliance requirements.
- Storage security includes the security of devices and media, the security of management activities related to the devices and media, the security of applications and services and security relevant to end-users during the lifetime of devices and media and after the end of use. (Ref. ISO/IEC 27040:2015(E))
- Records stored on disk or, if microfiche records remain in existence, are housed in a fireproof safe. The combination for the safe is kept with the individual entity's Quality and Compliance Manager and a second copy is kept in a secure file by the Data Protection Officer (DPO) (UK/E) and the Data Protection Manager (all other regions).
- Electronic data is backed-up daily.

2.8 Privacy

The Company's Privacy Policy is reflective of the regulatory changes taking place globally with respect to the protection of Personal Information. The Privacy Policy addresses:

- Transparency of information and communication ([GDPR Article 12](#))
- Provision of information to data subjects at point of collection ([GDPR Article 13](#))
- Provision of information to data subjects when information has not been collected directly from the data subject ([GDPR Article 14](#))
- Right of access by the data subject ([GDPR Article 15](#))
- Right to rectification ([GDPR Article 16](#))
- Right to erasure ('right to be forgotten') ([GDPR Article 17](#))
- Right to restriction of processing ([GDPR Article 18](#))
- Notification obligation regarding rectification or erasure of personal data or restriction of processing ([GDPR Article 19](#))
- Right to data portability ([GDPR Article 20](#))
- Right to object ([GDPR Article 21](#))
- Automated individual decision-making, including profiling ([Article 22](#))
- Restrictions ([GDPR Article 23](#))

For greater detail, refer to the Privacy Policy.

2.9 Processes

- a) This Policy and its implementation is predicated upon the continuous improvement framework (See Continuous Improvement Policy) that has been adopted by the Company.
- b) Records must be maintained on Company systems or infrastructure that is capable of meeting records management standards and legislative requirements, particularly those related to privacy and security.
- c) A system must be assessed by IT for compliance with records standards before it is implemented or before records are migrated to or from the system. A major change to an existing system must also be assessed by IT for such compliance through a defined procedure.
- d) Records must be organised and managed to preserve their context and ease of retrieval.
- e) Records must be retained in accordance with the approved Retention and Disposal Schedule (See Appendix 1).
- f) Throughout their full retention period, records must be actively managed and organised to preserve context, accessibility and usability.
- g) Records must be stored in conditions suitable to the:
 - longevity of the record in accord with legislation and Company policy
 - nature of the record content (e.g. personal, confidential or sensitive information)
 - format of the record or the medium it is retained/stored on
- h) Records must be destroyed at the date specified in the Retention and Disposal Schedule (See Appendix 1) using secure and permanent methods unless there is a:
 - pending or anticipated legal action or business use
 - current hold or freeze on destruction issued by General Manager Quality and Compliance
- i) Permanent value records are managed in accord with the Retention and Disposal Schedule (see Appendix 1) and security requirements for preservation and access.
- j) Records are made available in accordance with legislation and regulatory compliance obligations e.g. GDPR and within the constraints of security, confidentiality, privacy and archival access conditions as set out in the Retention and Disposal Schedule.

2.10 Continuous Improvement

- a) The improvement cycle of *Plan, Do, Review and Act* (see figure 1 below) is what drives the continuous improvement process.
- a) Continuous improvement in the management of information and information management systems is fundamental to the Company's ability to remain compliant with its regulatory obligations particularly with respect to the security of personal information and corporate reporting requirements.
- b) The use of a continuous improvement approach facilitates effective decision making, particularly with respect to decisions that impact the effective management and control of personal information and commercial in confidence data.
- c) The Company is able to continue to enhance its ability to better manage information collection, use, storage, transfer and disposition through the collation of data, comparative analysis, regular self-evaluation and reflective practices.

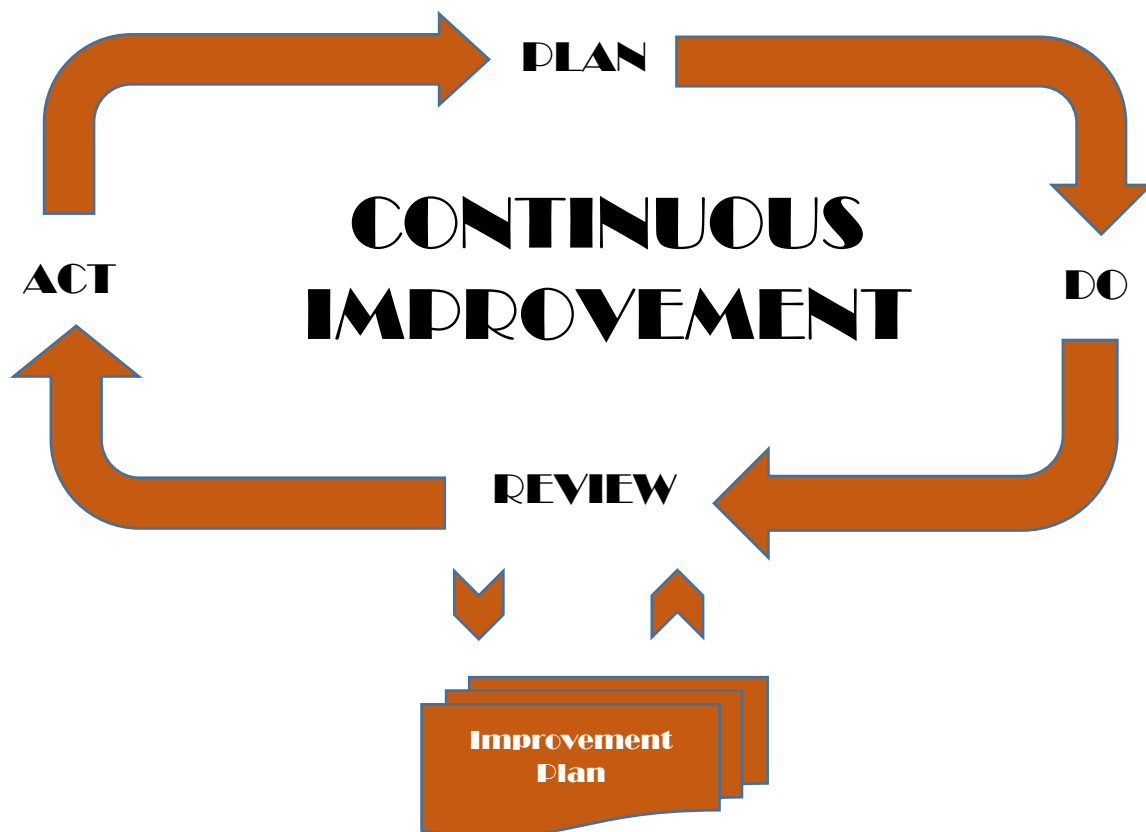


Figure 2: Improvement Cycle

3 Responsibilities

Each of the positions involved in implementing and achieving policy objectives.

Responsibility	CIO	Manager Quality and Compliance	Navitas IT Gov.	All Users	Navitas IT Leaders
Approver of Document	A				
Maintenance of Document		C	A		
Review of Document					C
Understanding of document				R	

R = Responsible, A = Approve, S = Supporting, C = Consulting, I = Informed.

4 Compliance

4.1 General

All Company persons who are responsible for records in any part of the record lifecycle policy are required to read and abide by its contents.

4.2 Breaches

Breaches of policy compliance may result in disciplinary action being taken against the offender."

4.3 Relevant Legislation

The Company is a global organisation with the responsibility to maintain compliance with the laws within our host nations. All Company users are responsible for aiding the Company in identifying relevant legislation and for complying with all relevant legislation.

5 Definitions

Unless the contrary intention is expressed in this Policy, the following words (when used in this policy) have the meaning set out below:

Term	Meaning
Company	Means Navitas Limited ACN 109 613 309 having its registered office at Level 8, Brookfield Place, Perth, 6000.
Group	Means the Company and all of its subsidiaries.
Provider	Means the telecommunications service provider.
Website (where relevant)	Means the Company's website where information is available to employees, shareholders and other interested persons or organisations.

6 Review

This Policy is tested and reviewed and any changes to the regulatory compliance requirements, legislation, regulation and guidelines. This review process aims to ensure alignment to appropriate strategic direction and continued relevance to the Company's' current and planned operations.

7 Records Management

All records in relation to this document will be managed as follows:

Record type	Owner	Location	Retention	Disposal
Policy	Chief Information Officer	Electronic	Permanent	N/A

APPENDIX – Company Limited Records Retention and Disposal Schedule

This Retention and Disposal schedule has been developed in accordance with the following Acts and general insight from the General Data Protection Regulation (GDPR) requirements relating to records management inclusive of retention and disposition:

Australia:

Student Assistance Act 1973 (Registered 03 January 2017)

<https://www.legislation.gov.au/Details/C2017C00005>

Student Identifiers Act 2014 (Registered 06 January 2017)

<https://www.legislation.gov.au/Details/C2017C00038>

Student Loans (Overseas Debtors Repayment Levy) Act 2015

<https://www.legislation.gov.au/Details/C2015A00155>

Tertiary Education Quality and Standards Agency Act 2011 (Registered 25 July 2016)

<https://www.legislation.gov.au/Details/C2016C00888>

[Tertiary Education Quality and Standards Agency \(Consequential Amendments and Transitional Provisions\) Act 2011](https://www.legislation.gov.au/Details/C2011A00074)

<https://www.legislation.gov.au/Details/C2011A00074>

Education Services for Overseas Students (Registration Charges) Act 1997

<https://www.legislation.gov.au/Details/C2016C00773>

Education Services for Overseas Students Act 2000 (registered 21 October 2016)

<https://www.legislation.gov.au/Details/C2016C00935>

Education Services for Overseas Students (TPS Levies) Act 2012 (Registered 11 July 2016)

<https://www.legislation.gov.au/Details/C2016C00779>

Competition and Consumer Act 2010 (Registered 03 March 2017)

<https://www.legislation.gov.au/Details/C2017C00062>

GDPR: <https://gdpr-info.eu/art-30-gdpr/>

CANADIAN PRIVACY *Personal Information Protection and Electronic Documents Act* ("PIPEDA") https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/pipeda_brief/

<https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

Singapore Personal Data Protection: <https://www.pdpc.gov.sg/>

New Zealand Privacy Act:

<http://www.legislation.govt.nz/act/public/1993/0028/latest/DLM296639.html>

<http://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/data-protection-and-privacy>

<https://www.privacy.org.nz/>

UK Data Protection Act 2017

<https://www.gov.uk/data-protection>

<https://iclg.com/practice-areas/data-protection/data-protection-2017/usa>

Retention & Disposal Schedule by Record Type

Description of Records	Status	Disposal Action
External Relations		
Alumni		
Alumni records including register of alumni and member details	Temporary	Retain for six (6) months after last action
Liaison		
Agreements to establish relationships with external organisations (dated)	Temporary	✓ Retain for seven (7) years after expiry or cancellation (<u>not signed under seal</u>) ✓ Retain for 12 years after expiry or cancellation (<u>signed under seal</u>)
Agreements to establish relationships with external organisations (undated)	Temporary	Retain for 25 years from date registered
Student Recruitment		
Records relating to appointment of external advertising and/or recruitment agencies or representatives and the agreements relating to agents or representatives	Temporary	Retain for seven (7) years after appointment ceases or agreement lapses
External Visits		
Records relating to visits from external entities to the Company premises	Temporary	Retain for one (1) year after last action

Description of Records	Status	Disposal Action
Financial Management		
Trust Fund Management		
Establishment of perpetual Trusts and Trusts	Permanent	Retain permanently
Establishment – other Trusts including legal documents defining the terms of the Trust and records relating to finalisation of the Trust	Temporary	Retain for 20 years after cessation of Trust and disbursement of all assets
Trust Fund Maintenance		
Trust fund maintenance and transaction reports, including: <ul style="list-style-type: none"> ✓ Periodic reports ✓ Batching records ✓ Incorrect calculations reports ✓ Processing/reporting request form ✓ Processing/updates or file maintenance run lists ✓ Trial balances ✓ Stores and materials daily/trail/current balances and balance comparison 	Temporary	Retain for 10 years after last action

Description of Records	Status	Disposal Action
Human Resource Management		
Awards and Recognition		
Establishment of performance excellence awards	Temporary	Retain for five (5) years after award is no longer offered
Personnel Files		
Senior staff or significant staff (e.g. method of earning dismissal extraordinary, significant notoriety in their discipline/industry or media)	Permanent	Retain permanently
Non-senior staff	Temporary	Retain for 70 years after date of birth AND seven (7) years after date of separation
Selection and Recruitment		
Senior Staff Positions – recruitment process documentation, unsuccessful candidates and successful candidates that do not commence	Permanent	Retain permanently
Other Staff Positions – recruitment process documentation, unsuccessful candidates and successful candidates that do not commence	Temporary	Retain for one (1) year after appeal period expires
Staff Exchanges/Secondments		
Records relating to arrangements for staff exchanges with other entities	Temporary	Retain for two (2) years after arrangement expires
Study or Professional Development Leave		
Applications for study or professional development leave – successful	Temporary	Retain for seven (7) years after last action
Applications for study or professional development leave – unsuccessful	Temporary	Temporary Retain for two (2) years after last action

Description of Records	Status	Disposal Action
Publishing		
Policy		
Final version of a policy	Permanent	Retain permanently
Policy – working papers and drafts	Temporary	Retain until Policy is superseded
Intellectual Property		
Administration of intellectual property. Includes internal and external correspondence related to intellectual property management.	Temporary	Retain for five (5) years after last action
Intellectual Property		
Records relating to disputes and/or infringements concerning intellectual property	Temporary	Retain for 10 years after last action

Description of Records	Status	Disposal Action
Student Administration		
Admission		
Successful applications for admission – includes: <ul style="list-style-type: none"> ✓ Offer letters ✓ Applications ✓ Supporting documents ✓ Immigration clearances (Confirmation of Enrolment) ✓ Acceptances ✓ Any other relevant supporting documentation 	Temporary	Retain for seven (7) years after last action
Applicant with no enrolment record on the Student Management System	Temporary	Retain for 6 months after the census date of the semester that student was due to commence
Unsuccessful applications for admission	Temporary	Retain for six (6) months after the applicant notified of outcome and/or conclusion of any appeals process
External Admission Centres e.g. Universities and Colleges Admission Service (UCAS) in the UK, Universities Admission Centre (UAC) electronic file including academic results and all student/course preferences	Temporary	Retain for two (2) years after relevant Government Department, e.g. DET in Australia, census date
Records relating to the number of places offered in programmes or courses, based on data from the external admission agency	Temporary	Retain for three (3) years after relevant census date
Calendars and Handbooks		
Duplicate sets of calendar and handbook publications	Temporary	Retain until reference ceases
Master set of calendar and handbook publications	Permanent	Retain permanently (electronically)
Enrolment		
Records of individual students relating to academic progress, course progression and unit participation: <ul style="list-style-type: none"> ✓ Exclusions, academic progress, academic standing ✓ Warnings regarding poor course progression ✓ Withdrawal without academic penalty ✓ Certificates/prerequisites for unit participation ✓ Visa approvals ✓ Immigration notifications relating to enrolment status ✓ Credit transfer ✓ Leave of absence 	Temporary	Retain until course completion and for seven (7) years after last action Where course was abandoned, retain until maximum period for course completion elapses plus one (1) year.
Enrolment		

Description of Records	Status	Disposal Action
Records used for administrative verification such as records relating to the enrolment of students into courses of study. Documents include: <ul style="list-style-type: none"> ✓ Enrolment/re-enrolment forms ✓ Verification/Confirmation of Enrolment ✓ Course cancellation/changes to enrolment ✓ Student arrangements including enrolment times 	Temporary	Retain for four (4) years after last action
Graduation		
Records related to protocols for Academic Dress (if appropriate)	Permanent	Retain permanently
Conferral Proceedings including records related to the conferral of certificates, protocols and transcripts of guest speeches	Temporary	Retain for 10 years after last action
Eligibility to Graduate, including notifications to students regarding finalisation, approval and graduation ceremony	Temporary	Retain for two (2) years after graduation ceremony
Graduation Programs	Temporary	Retain for five (5) years after last action
Requests for replacement testamurs including fees and supporting documentation	Temporary	Retain for two (2) years after last action
Master record of graduands	Permanent	Retain permanently
Student Misconduct (Academic and Non-Academic)		
Records relating to allegations of misconduct, academic or non-academic	Temporary	Retain until course completion. Where course has been abandoned, retain until maximum period for course completion elapses
Investigations of non-academic misconduct involving external agencies and regarding criminal or legal investigations of non-academic misconduct	Temporary	Retain for seven (7) years after last action
Scholarships, Prizes, Awards and Bursaries		
Administrative arrangements for presentation ceremonies for scholarships, prizes, awards and bursaries awarded by the Company, including programmes of proceedings	Temporary	Retain until reference ceases
Administration, determination and/or nomination of recipients of scholarships, prizes, awards and bursaries.	Temporary	Retain for five (5) years after prize awarded
Applications for scholarships, prizes, awards and bursaries	Temporary	Retain until end of appeal period
Records relating to the establishment, rules and conditions of scholarships, awards, prizes and bursaries. This includes registers of past recipients of scholarships, awards, prizes and bursaries	Permanent	Retain permanently
Academic Year		

Description of Records	Status	Disposal Action
Academic Year – organisation and structure including semester and other reaching period dates and key administrative and committee dates	Temporary	Retain for one (1) year after the academic calendar has been superseded
Student Details		
Change of name, address, or other details	Temporary	Retain history of all contact details until student graduates or exits without graduating. Details should be maintained in chronological order in the student management system.
Photographic images for student identity cards, including negatives.	Temporary	Retain until reference ceases
External enquiries relating to verification of personal details, academic records and student academic progress	Temporary	Retain for one (1) year after last action
Student Fees and Charges		
Administration – fees and fines including tuition fees (not including student contribution fees), and library fines. Including correspondence related to outstanding fees and fines	Temporary	Retain for five (5) years from end of last financial year
Administration – sanction for non-payment of tuition fees (not including student contribution fees), and library fines (Not Paid)	Temporary	Retain for 70 years from date of enrolment
Administration – sanction for non-payment of tuition fees (not including student contribution fees), and library fines (Paid)	Temporary	Retain for three (3) months after last action
Summary of student data maintained in the student information system for the purpose of providing information on individual student. Information retained on the system should include, but is not limited to: <ul style="list-style-type: none"> ✓ Student name ✓ Student ID ✓ Date of birth ✓ Enrolment summary ✓ Misconduct summary ✓ Awards/courses completed 	Permanent	Retain permanently
Student Intake Load		
Records related to student load intake management in courses and/or units. Includes but not limited to: <ul style="list-style-type: none"> ✓ Projection and target reports ✓ Student load statistic reports 	Temporary	Retain for five (5) years after last action

Description of Records	Status	Disposal Action
Student Services		
Counselling		
Appointment registers and records relating to the provision of counselling programs or activities.	Temporary	Retain for two (2) after last action
Client files – personal, academic and general counselling patient files.	Temporary	Retain for seven (7) years after appointment or access on behalf of the client AND until the client is 25 years of age
Equity and Diversity		
Equipment – records relating to provision of equipment and media to students	Temporary	Retain for five (5) years after last action
Records relating to courses devised to facilitate equity and diversity	Temporary	Retain for five (5) after course ceases
Financial Assistance		
Discretionary funds – administration, establishment and maintenance of funds to assist students in attending conferences, sporting competitions etc. including successful applications	Temporary	Retain for five (5) years after last action
Unsuccessful applications for discretionary funds including supporting documentation.	Temporary	Retain for one (1) year after last action
Administration of student loans scheme. Includes records related to the establishment, rules and regulations of the scheme	Temporary	Retain for five (5) years after scheme becomes obsolete
Student loans– successful applications, including: <ul style="list-style-type: none"> ✓ Supporting documentation ✓ Assessment ✓ Approvals ✓ Repayments ✓ Requests for extensions 	Temporary	Retain for five (5) years after discharge of the loan
Student loans – unsuccessful applications	Temporary	Retain for one (1) year after last action and expiration of appeal period
Learning Skills		
Courses and activities related to the enhancement of learning skills, including provision of information, planning and review.	Temporary	Retain for two (2) years after course superseded
Orientation		
Arrangements for student orientation: Open days , Programmes, etc.	Temporary	Retain for two (2) years after last action
Recreational Services		
Records relating to the provision of recreational programs or activities	Records relating to the provision of recreational	Records relating to the provision of recreational programs or activities

Description of Records	Status	Disposal Action
	programs or activities	

Description of Records	Status	Disposal Action
Learning and Teaching		
Assessment		
Academic records of student grades in College courses and units	Permanent	Retain permanently
Completed assessment including examination scripts and other forms of assessment. Includes written, oral, performance, assignments and presentations	Temporary	Retain for one (1) year after release of results
Attendance records – examinations and other assessment activities	Temporary	Retain for six (6) months after last action
Examination papers – master set	Permanent	Retain permanently
Results - records relating to the results of assessment items or examinations. Includes: ✓ Appeals ✓ Changes ✓ Review ✓ Grading	Temporary	Retain for two (2) years after last action
Special arrangements for assessment/examinations for individual students and/or distance education or remote sites	Temporary	Retain for one (1) year after last action
Special consideration requests and outcomes. Includes requests for deferred/supplementary examinations	Temporary	Retain until the end of the appeal period
Examination arrangements - supervision for assessment items and examinations, including invigilation arrangements and timetables	Temporary	Retain for one (1) year after last action
Records relating to withdrawals and/or graduation outcomes: ✓ Academic Transcripts ✓ Awards	Permanent	Retain permanently
Awards – Staff Teaching Excellence and Staff Administrative/Management Excellence		
Records related to consideration of applications for potential award nomination	Temporary	Retain for five (5) years after award no longer offered
Successful applications and nominations for an award	Permanent	Retain permanently
Applications – unsuccessful: ✓ Applications nominated for an award which are unsuccessful ✓ Applications not nominated after consideration	Temporary	Retain for five (5) years after award no longer offered
Records related to establishment of awards at a College or campus	Temporary	Retain for five (5) years after award no longer offered
Curriculum Management		
Accreditation by professional bodies – documentation and records	Temporary	Retain for ten (10) years after accreditation expires
Records related to the approval of curricula	Permanent	Retain permanently

Description of Records	Status	Disposal Action
Development of award courses and units – curricula development	Temporary	Retain for 10 years after programme ceases to be offered
Non-award courses or units – development of curricula	Temporary	Retain for five (5) years after last action
Teaching staff working papers for course/subject preparation and delivery	Temporary	Retain for six (6) months after last action
Collaborative Ventures		
Proposals for collaborative of joint ventures which do not proceed	Temporary	Retain for five (5) years after last action
Establishment and strategic management of joint/collaborative ventures. Records include: <ul style="list-style-type: none"> ✓ Preliminary discussions ✓ Copy of proposal or submission ✓ Deed of agreement ✓ Appointment of steering committee or board members Terms of reference or tasks ✓ Notification of withdrawal ✓ Funding agreements College ongoing participation ✓ Restructures ✓ Financial reports ✓ Other strategic matters 	Permanent	Retain permanently
Delivery		
Definitive Course Documents	Permanent	Retain Permanently
Unit Outlines	Temporary	Retain for 10 years after unit last offered
Audio/audio-visual recordings of teaching sessions: <ul style="list-style-type: none"> ✓ Lectures ✓ Tutorials ✓ Seminars ✓ Workshops 	Temporary	Retain for six (6) month after last action
Resources and materials used in subject and/or course delivery. Includes: <ul style="list-style-type: none"> ✓ Study guides ✓ Readings ✓ Self-assessment exercises ✓ Audio-visual teaching aids ✓ Assignments ✓ Lecture notes 	Temporary	Retain for two (2) years after last action
Ethical Clearances as required		
Records related to ethical clearance for teaching activities related to animals, includes: <ul style="list-style-type: none"> ✓ application ✓ supporting documentation ✓ assessment ✓ decision 	Temporary	Retain for seven (7) years after last action
Records related to human subjects' consent to involvement in teaching activities.	Temporary	Retain for 15 years after project concluded or abandoned

Description of Records	Status	Disposal Action
Records related to the ethical clearances required for working with genetically modified material or high risk material, includes: <ul style="list-style-type: none"> ✓ application ✓ supporting documentation ✓ assessment ✓ decision 	Temporary	Retain for 15 years after project concluded or abandoned
Records relating to the use of expedited processes for ethical clearance related to teaching activities involving human subjects	Temporary	Retain for 10 years after project concluded or abandoned
Records related to the full process for ethical clearance related to teaching activities involving human subjects	Temporary	Retain for 15 years after project concluded or abandoned
Records relating to the monitoring of ethical practices through both internal and external mechanisms	Temporary	Retain for seven (7) years after project concluded or abandoned
Evaluation		
Administration of data collection for evaluations of teaching, units and courses	Temporary	Retain for two (2) years after last action
Analysis and survey data related to evaluations	Temporary	Retain for five (5) years after last action
Reports of evaluation outcomes	Permanent	Retain permanently
Intellectual Property		
Administrative correspondence related to intellectual property management. Includes: <ul style="list-style-type: none"> ✓ Unsuccessful applications for grant or registration of intellectual property ✓ Supporting information ✓ Searches ✓ Correspondence between officers or solicitors/attorneys 	Temporary	Retain for five (5) years after last action
Records related to arrangements for use. Includes: <ul style="list-style-type: none"> ✓ Correspondence between licensors and licensees ✓ Agreements ✓ Material or product transfer 	Temporary	Retain for seven (7) years after expiry or cancellation of agreement
Records relating to intellectual property disputes, includes: <ul style="list-style-type: none"> ✓ Notification ✓ Mediation ✓ Agreement ✓ Outcome 	Temporary	Retain for 10 years after last action
Registration records of intellectual property, includes:	Permanent	Retain permanently

Description of Records	Status	Disposal Action
<ul style="list-style-type: none"> ✓ Applications for grant or registration ✓ Formal assignment of intellectual property ✓ Request form, specification, patent – provisional or complete ✓ Request for examination ✓ Acceptance ✓ Objection – statement, hearings ✓ Extensions for registration ✓ Renewal ✓ Supporting documents ✓ Final documents (e.g. the sealed patent licence) 		
Learning Materials		
Records related to the acquisition and disposal of chemicals, specimens, drugs, poisons etc. used in teaching and learning activities and not controlled by other legislation/regulations	Temporary	Retain for five (5) years after last action
Records related to the management of clinical and hazardous waste in accordance with regulatory requirements set out under the relevant environment protection Act e.g. the <i>Environment Protection Act 1997</i> (the Act) in Australia	Temporary	Retain for five (5) years after last action
Practicum		
Records of administrative arrangements related to practicum placements	Temporary	Retain for two (2) years after last action
Agreements with other organisations to allow placements	Temporary	Retain for 15 years after expiry or cancellation of agreement
Participation records providing proof of the number of hours completed by students and the level of performance where required	Temporary	Retain until course completion, or if course abandoned, until maximum period for course completion has elapsed
Teaching Projects		
Agreements/contracts for teaching projects.	Temporary	Retain for seven (7) years after expiry of agreement OR 15 years after expiry of agreement if signed under seal
Records regarding the formulation and development of teaching projects. Includes working papers and preliminary data	Temporary	Retain for five (5) years after project completion
Funding proposals for teaching projects, includes: <ul style="list-style-type: none"> ✓ Successful and unsuccessful proposals for internal and external competitive and non-competitive funding ✓ Application forms ✓ Tenders ✓ Supporting information ✓ Referees 	Temporary	Retain for five (5) years after last action

Description of Records	Status	Disposal Action
<ul style="list-style-type: none"> ✓ Protocols ✓ Reports 		
<p>Reports on individual projects as required by conditions of granting bodies, legislation and protocol</p> <p>OR</p> <p>Communication to the wider community. Includes any and all progress or interim reports, final reports and presentations</p>	Temporary	Retain for five (5) years after project completion
Teaching Strategy Development		
Approved operational teaching plan, inclusive of improvement plan and areas of focus in teaching delivery	Temporary	Retain for five (5) years after plan superseded
Records related to formulation, development and evaluation of operational teaching plans and teaching strategies, including proposals, correspondence, briefing and discussion papers	Temporary	Retain for three (3) years after last action
Approved strategic learning and teaching plan, mapped to the Company's mission statement, objectives, goals and performance indicators and all supporting documents, inclusive of approval documentation	Permanent	Retain permanently
Timetabling		
Records related to the booking of classes, exams and workshops for teaching or other purposes	Temporary	Retain for one (1) year after last action

Description of Records	Status	Disposal Action
GOVERNANCE		
Annual Submissions		
Annual submissions to Government related to core business activities	Permanent	Retain permanently
Submissions to Government on other business activities including for example programme approvals for student income support payments	Temporary	Retain for 10 years after submission
Committees		
Committee papers for working parties include: <ul style="list-style-type: none"> ✓ Minutes ✓ Agendas ✓ Submissions 	Temporary	Retain for two (2) years after relevant working party ceases to exist
Committee records – governing boards and significant committees and includes records of meetings of the following groups but is not limited to: <ul style="list-style-type: none"> ✓ Board of Directors ✓ Navitas Leadership Team ✓ Audit and Risk Committee ✓ Finance Committee ✓ Academic Board ✓ Senior Executive Management Group/s ✓ Learning and Teaching Committee ✓ Curriculum Review and Renewal working Party/ies ✓ Examinations and Progression Committee ✓ Academic Appeals and Grievances Committee ✓ Marketing and Admissions Planning Committee ✓ General Operations Committee (UX Group) ✓ College Enhancement Committee Committees' Records include: <ul style="list-style-type: none"> ✓ Master set of meeting papers ✓ Agendas ✓ Constitution or terms of reference ✓ Signed minutes ✓ Records related to the appointment of members (not including records related to member election) 	Permanent	Retain permanently
Records documenting activities of key Committees/Boards, particularly for example the Academic Board, which report to Navitas Limited' Board of Directors and/or Divisional Boards of Directors, major boards/committees of	Temporary	Retain for ten (10) years after committee ceases to exist

Description of Records	Status	Disposal Action
Divisions, or ad-hoc committees. Documentation to be retained includes: <ul style="list-style-type: none"> ✓ Master set of meeting papers ✓ Agenda ✓ Constitution or terms of reference ✓ Signed minutes ✓ Records related to the appointment of members (not including records related to member election) 		
Corporate Identity		
Records related to the development of corporate identity objects including design and format. Examples include letterhead, logo, testamurs, and common seal.	Permanent	Retain Permanently
Records related to falsification or misuse of corporate identity. Examples include fraudulent use of web content, falsified transcripts	Temporary	Retain for seven (7) after last action
Records relating to the protection of the Company's identity. Includes registration of logo, trademarks, applications and approvals	Permanent	Retain permanently
Records or registers of use of Navitas seal	Temporary	Retain for seven (7) years after last action
Elections		
Records related to the conduct of elections. Includes: <ul style="list-style-type: none"> ✓ Advertising ✓ Nominations ✓ Ballot papers ✓ Notices ✓ Results ✓ Appointment of scrutineers ✓ Tally sheets 	Temporary	Retain for one (1) year after declaration of election result
Electoral roles and related records of individuals eligible to vote	Temporary	Retain for one (1) year after declaration of election result
Results of elections	Temporary	Retain for 5 years after declaration of election result
Licensing and Accreditation		
Registration and Accreditation approvals and supporting documentation	Permanent	Retain permanently
Risk Management		
Records relating to claims of fidelity guarantee and coverage for fraud	Temporary	Retain for seven (7) years after last action
Allegations and claims of professional negligence and public liability compensation which have not been finalised by litigation – claims related to adults	Temporary	Retain for seven (7) years after claim settled

Description of Records	Status	Disposal Action
Allegations and claims of professional negligence and public liability compensation which have not been finalised by litigation – claims related to minors	Temporary	Retain for 70 years after claim settled
Records of notification of injury or accidents – adult students, visitors, or members of the general public	Temporary	Retain for 10 years after last action
Records of notification of injury or accidents – minor students, visitors, or members of the general public	Temporary	Retain for 30 years after last action
Allegations and claims finalised without litigation. Examples include motor vehicle or property damage	Temporary	Retain for seven (7) years after claim settled
Records related to risk management controls implemented by the College	Temporary	Retain for seven (7) years after last action
Insurance policy documents (includes renewals and associated correspondence)	Temporary	Retain for seven (7) years after expiration of the policy
Rules and Statutes		
Approved rules and statutes	Permanent	Retain permanently
Working papers and research material used in the preparation of drafts	Temporary	Retain for six (6) months after last action
Records related to the making and amending of rules and statutes. Records include formal consultation and submissions, and developmental drafts and correspondence which authorise further stages of development.	Temporary	Retain for five (5) years after last action