

 <p>SPJ GLOBAL</p> <p>S P Jain School of Global Management</p> <p>DUBAI • MUMBAI • SINGAPORE • SYDNEY</p>	<h2>Records Management Policy</h2>
Document Type	Policy
Administering Entity	President, Vice President – Academic, Vice President – Administration, Registrar, Chief Financial Officer (CFO), Chief Marketing Officer (CMO), Director – Accreditation and Regulatory Compliance, Director – People and Culture, Director /Deputy Director – Secretariat to AB and BoD, Heads of Campuses (HoCs)
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Approval Authority	Board of Directors
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1. Purpose

This Policy regulates the creation, maintenance and disposal of records relating to S P Jain School of Global Management (S P Jain/the School) for the purposes of administration, security, corporate memory and legal obligations.

2. Scope

The policy applies to all academic and administrative staff at S P Jain with responsibilities for record management. All physical and digital records are the property of S P Jain and as such this policy governs the processes for record management.

3. Responsibilities

- a. The President is responsible for ensuring that record management meets legislative requirements.
- b. The managers below are responsible for records management at the operational level and ensuring the implementation of this Policy:
 - i. Student Records: Vice President – Administration, Registrar, Director – Examinations and Director – Admissions
 - ii. Research Records: Dean – Research or nominee
 - iii. Finance Records: Chief Financial Officer (CFO)
 - iv. Staff Records: Director – People and Culture

- v. Campus, Facilities and IT Records: Vice President – Administration, Heads of Campuses
 - vi. Marketing and Advertising Records: Chief Marketing Officer (CMO)
 - vii. Accreditation and Registration Records: Vice President – Academic, Vice President - Administration and Director - Accreditation and Regulatory Compliance
 - viii. Course/ Curriculum Materials: Vice President – Academic and nominees
 - ix. Contract and Legal: President, Vice President – Administration and Heads of Campuses
 - x. Partnerships with Higher Education Institutions- Office of the President and Registrar
 - xi. Security and OHS: President, Vice President – Administration and Heads of Campuses
 - xii. Institutional Policies: Vice President – Administration and Director – Accreditation and Regulatory Compliance
 - xiii. Governance Records: Director/Deputy Director – Secretariat
- c. All staff are responsible for creating appropriate and accurate records of the business activities and affairs of the School.
- d. All staff with responsibilities for record management will receive records management training as part of their orientation and induction.
- e. Each manager with responsibility for records creation and management must:
- i. Create and maintain accurate records of all activities for which he or she is responsible;
 - ii. Create records that document formal decisions;
 - iii. Create records that are accurate and detailed sufficiently to capture and communicate important and significant events relevant to the safety, security, compliance and continuity of the School and its students;
 - iv. Handle all records with care and confidentially where required and as applies to personal data or records;
 - v. Protect records from accidental damage;
 - vi. Protect sensitive records from unauthorised access;
 - vii. Archive or store records in line with their period of retention; and
 - viii. Not destroy records without prior authorisation

4. Auditing

- a. Records management activities will be periodically audited to ensure they are being created and maintained correctly and an accurate record of the School's business activities and affairs is being captured in the records management system.

5. Collection, storage, use and access to third party of student and staff information

- a. S P Jain will only manage student and staff information by lawful and fair means and as set out in the Information Management Policy and the Student Information Provision Policy.
- b. If a staff member or student believes their privacy has been breached, they may make a complaint in accordance with the relevant Student Grievance and Mediation Policy and Procedures or Staff Grievance and Complaints Policy and Procedures, as applicable.

6. Retention and Disposal of Records

- a. Financial, personnel and administration related records should comply with local regulatory requirements for records management at each of the campus locations.
- b. The delegated officers listed are responsible for developing and implementing supporting procedures and processes for retention and disposal of records in their respective functional areas.
- c. No records can be destroyed without the permission of the relevant manager.
- d. The destruction process must be secure to ensure confidentiality.
- e. Appendix 1 sets out the retention period and guidelines for key record types.

7. Record Security

- a. Records must not be altered, and all care must be taken not to damage records.
- b. All records will be kept in a secure environment.
- c. All access to and use of School records will comply with relevant privacy and freedom of information legislation.
- d. School records will be available to staff for the purposes of their work, within the constraints of security, privacy and confidentiality.

Related Documents

- a. Information Management Policy
- b. Staff Code of Conduct Policy
- c. Staff Grievance and Complaint Policy and Procedures
- d. Student Grievance and Mediation Policy and Procedures
- e. Student Information Provision Policy

Appendix 1: Record Retention Guide

- a) As a privately owned Institute of Higher Education registered under the TEQSA (2011) and the ESOS Act (2000), S P Jain is not subject to the Retention and Disposal Authority– University records GDA47¹.
- b) However, the School will use the Authority as a guide to determine minimum period of record retention for common records unless otherwise required by other legislative or regulatory requirements.

Summary of Retention Periods for Key Records

Record Area	Responsibility	Record	Retention Period
Student Records	Vice President - Administration, Registrar and Director - Admissions	<ul style="list-style-type: none"> • Student Applications • Written Agreements • RPL and Credit Applications • Fees Receipt 	Retain for at least 2 years after student ceases to be a student (National Code 2018)
Student Records	Vice President - Administration and Registrar	<ul style="list-style-type: none"> • Student Grievances & Appeals • Student Penalties • Student Medical Records 	Retain for at least 7 years after the student ceases to be a student.
Student Records	Director - Examinations and Registrar	<ul style="list-style-type: none"> • Assessment Records 	Retain for at least 5 years after the student ceases to be a student.
Student Records	Dean – Research or nominated staff	<ul style="list-style-type: none"> • Ethics approvals for approval applications in the "minimal risk" category for doctoral students 	Retain for at least 5 years after the student ceases to be a student.
Student Records	Registrar	<ul style="list-style-type: none"> • Graduation Records 	Permanent Retention
Research Records	Dean – Research or nominated staff	<ul style="list-style-type: none"> • Theses and theses assessments for doctoral students • Ethics approval applications, research data and reports which are NOT in "minimal risk" category 	Retain for at least 15 years after the action completed

¹ <https://staterecords.nsw.gov.au/recordkeeping/guidance-and-resources/resources-universities#disposal-of-university-records>

Record Area	Responsibility	Record	Retention Period
Finance Records	Chief Financial Officer (CFO)	<ul style="list-style-type: none"> All accounting records 	Retain for at least 5 years after audit or longer as required by local regulations
Staff Records	Director - People and Culture	<ul style="list-style-type: none"> Staff /Employee application, supporting evidence and contractual agreements Payroll records Staff / Employee Taxation Records Separation Certificates 	Retain for at least 7 years after employment ceases or longer as required by local regulations
Campus, Facilities and IT Records	Vice President - Administration and Heads of Campuses	<ul style="list-style-type: none"> IT agreements Critical Incidents Housing and Accommodation Records 	Retain for at least 7 years or longer as required by local regulations
Marketing and Advertising Records	Chief Marketing Officer (CMO)	<ul style="list-style-type: none"> Student Recruitment Marketing Materials 	Retain 5 years from date of distribution and for cohort specific marketing and advertising materials at least 2 years after every student in the cohort graduates/ ceases to be a student
Student guidebooks	Registrar and Heads of Campuses	<ul style="list-style-type: none"> Student Handbooks Student Campus handbooks 	Retain for at least 2 years after every student in the cohort graduates /ceases to be a student
Accreditation and Registration Approvals and Records	Vice President – Academic, Vice President Administration and Director- Accreditation and Regulatory Compliance	<ul style="list-style-type: none"> All legislative approvals and exemptions All regulatory and accreditation decisions 	Permanent Retention
Curriculum materials	Vice President - Academic and nominees	<ul style="list-style-type: none"> Curriculum materials for each unit of study 	Retain for at least 2 years after cohort graduation

Record Area	Responsibility	Record	Retention Period
Contract and Legal	President, Vice President – Administration and Heads of Campuses	<ul style="list-style-type: none"> • Agreements Establishment, negotiation, maintenance and review of agreements • Insurance Acquisition 	Retain for at least 7 years after expiry or termination of agreement or after action completed, or as per local regulatory requirements whichever is later
Partnerships with Higher Education Institutions-	Office of the President and Registrar	<ul style="list-style-type: none"> • MoUs • Student exchange agreements • Joint degree partnerships 	Retain for at least 7 years after action completed
Security and OHS	President, Vice President – Administration and Heads of Campuses	<ul style="list-style-type: none"> • Records relating to incidents that result in serious personal injury or incapacity to employees and students. 	Retain for at least 7 years after action completed or as per local regulatory requirements whichever is later
Security and OHS	Vice President – Administration and Heads of Campuses	<ul style="list-style-type: none"> • Records relating to the provision of first aid treatment that do not result in serious injury 	Retain for at least 5 years after action completed
Institutional Policies	Vice President Administration and Director- Accreditation and Regulatory Compliance	<ul style="list-style-type: none"> • All policies 	Retain at least 5 years after policy is superseded
Governance Records	Director/Deputy Director - Secretariat	<ul style="list-style-type: none"> • Approved Committee TORs, Confirmed Papers and Minutes 	Permanent Retention