
POLICY C32.0

Information Management

1.0 INTRODUCTION

1.1 Context

Scentia and its subsidiaries, the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and AIM VET, a Registered Training Organisation (RTO), collectively 'the Scentia Group' is committed to managing information as an organisational asset which is created, used and Shared effectively whilst meeting national and state legislative requirements including those related to higher education and vocational education and training.

1.2 Purpose

This policy establishes the framework and principles for effective information management which supports the functions and activities of the Scentia Group.

1.3 Scope

The information management policy includes:

- creation and management
- storage and integrity
- retention and disposal and
- risk and business continuity.

This policy applies to all Scentia staff including AIM, ABS and ACHW staff, temporary employees, contractors, visitors and third parties globally who manage Scentia information. This policy applies to all business systems, services or applications used to create, manage, and store information, including Scentia endorsed information and records management systems, cloud services and email systems, internal and external websites, social media applications, collaboration applications and databases.

This policy does not override any legal, regulatory, or statutory requirements that Scentia is bound to comply with.

1.4 Scope Exceptions

None

2.0 RESPONSIBILITIES

1. All those referred to under the Scope of this policy are responsible for complying with its terms and procedure.
2. The Chief Financial Officer is responsible for ensuring Scentia meets information requirements under the Corporations Act 2001.
3. The Head of Human Resources is responsible for ensuring that Scentia meets the Fair Work Act 2009 and Fair Work Regulations 2009 for information and records management of staff.
4. Contract Owners of Managed Service Providers responsible for the approval of the procurement of IT managed services must ensure that suitable contract provisions require the provider to comply with the provisions of this policy. Contract owners must ensure compliance by the provider throughout the contract term.
5. Executive Directors of AIM, ABS and ACHW are responsible for ensuring staff comply with Scentia information and record keeping requirements and relevant legislation and standards.
6. All staff are responsible for complying with this policy.
7. The Data and Information Security Committee is responsible for the review of this Policy and Procedure in consultation with the Head of Technology.
8. The Head of Technology has overall responsibility for:
 - a. the implementation of this Policy and Procedure; and
 - b. providing quality information storage, security and availability as required for Scentia.

3.0 POLICY

Scentia recognises the high value of its information assets and is committed to managing information as an organisational asset which is created, used and Shared effectively whilst meeting legislative requirements.

This policy and supporting procedure support organisational outcomes and continuous improvement, and seeks to provide appropriate controls, processes, and procedures to ensure Scentia information is governed, managed and compliant in accordance with relevant Commonwealth and NSW Government legislation, regulations, and standards and with Scentia information management principles.

3.1 Principles

1. All information, data or records created or received by Scentia staff in the course of Scentia's operations and activities, including where an activity is outsourced or supported by a service provider, are owned by Scentia.

2. Scentia stores and protects its information and data electronically in Scentia Approved Information Systems: Learning Management Systems, Customer Relationship Management System, Student Information and Records Management System, Finance, HR and marketing systems.
3. Scentia supports the digitisation of all information and records and manages its information and records in its approved Records Management system: Shared Storage Drives, accessed through unique login, secure password access and approved user permissions. Staff working documents can also be stored in Scentia approved cloud storage services linked to user identity.
4. Scentia ensures it has appropriate controls, processes, and procedures to ensure all information is governed, managed and compliant in accordance with relevant NSW Government legislation, regulations, and standards and with Scentia information management principles.
5. Scentia will take reasonable and necessary steps to ensure information security protection. Information Security Classifications will enable appropriate management of information. (refer to *Scentia Information Cyber Security policy*)
6. Scentia information will be
 - a. collected, created, managed, used, re-used and shared according to ethical practices, any applicable laws and with due consideration to individual privacy;
 - b. appropriately stored to ensure protection from loss and unauthorised access;
 - c. accessible, transparent and available to be used and shared whilst respecting matters of identity, privacy and confidentiality. This applies to internal as well as third party data;
 - d. managed in accordance with records management, retention and archiving requirements.
7. Scentia will implement procedures and practices to ensure all information is captured accurately and completely and managed throughout its lifecycle and will provide access to formal or informal learning material to ensure staff have the knowledge, competencies and ability to interact with information in their roles.
8. Scentia is committed to complying with the Australian Privacy Principles as defined in the Commonwealth of Australia Privacy Act 1988. (Refer to our *Privacy of Student Information and Records Policy* and *Privacy of Staff Information and Records Policy* for more information).

4.0 DEFINITIONS

- **Approved Information Systems** - Refers to systems Scentia uses to manage business operations, store and manage information and data as part of its business and to meet legislative requirements.
- **Approved Records Management System** - Scentia supports Shared Storage Drives for the storage of approved records and Scentia approved cloud storage services for staff working documents.
- **Asset** - means any tangible or intangible item that Scentia owns, or has legal or other
- right to control and exploit to obtain financial or other economic benefit.

- **Authorised User** - means a person who has been provided with credentials to access Scentia ICT Asset /s or Information Asset.
- **ICT Services**- Any information, communications technology or audio-visual service, equipment or facility owned leased or contracted by the Scentia group that hosts, stores, transmits or presents digital information for the business and purpose of Scentia. This may include, but is not limited to:
 - email, messaging and collaboration applications;
 - any cloud-based facilities associated with the delivery of ICT activities;
 - all hardware and infrastructure (e.g. servers, workstations, voice and data network, wired and wireless networks, audio visual equipment, printers, and portable storage devices);
 - videoconferencing and web conferencing systems, services applications; and
 - all software and applications, and services (including but not limited to internet access), and data contained or stored in any ICT facility.
 - Learning Management Systems (my AIM, myABS, myACHW)
- **Information Asset** - means a body of information, knowledge or data that has value to Scentia.
- **Information, data, records**- Any digital or paper information, digital or paper stored, transmitted or presented for the business and purpose of Scentia.
- **myAIM** - Learning Management System for students enrolled in the Australian Institute of Management Education and Training (AIM) Registered Training Organisation (RTO) offering vocational education and training (VET) courses.
- **myABS** - Learning Management System for students enrolled in the Australian Institute of Management Business School, a registered Higher Education provider.
- **myACHW** - Learning Management System for students enrolled in the Australasian College of Health & Wellness, a registered Higher Education provider.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- Code of Conduct Policy (Staff and Students)
- Privacy of Staff Information and Records
- Privacy of Student Information and Records
- Scentia Risk Management Policy
- Information and Cyber Security Policy
- Student Use of ICT Services Policy and Procedure
- Scentia Business Continuity Plan 2021
- Social Media Policy (Staff and Students)
- Staff Use of ICT Facilities Policy and Procedure
- Student Use of ICT Services Policy and Procedure
- Corporations Act 2001(Section 286)
- Copyright Act 1968 (Cth Australia)
- Education Services for Overseas Student Act 2000 (ESOS Act)
- Fair Work Act 2009
- Fair work Regulations 2009
- General Retention and Disposal Authorities (GDAs) GA-45- Original or source records that have been copied; GA-47-General retention and disposal

- authority: higher and further education
- Higher Education Standards Framework (Threshold Standards 2021 (HES Framework))
- National Code of Practice for Providers of Education and Training to Overseas Students (National Code 2018)
- National VET Regulator Act 2011
- Privacy and Personal Information Protection Act (PIIPA) 1998 No 133
- Standards for Registered Training Organisations (RTOs) 2015
- State and Records Authority NSW
- Telecommunications (Interception and Access) Act 1979 (Cth Australia)
- Tertiary Education and Quality Standards Act 2011
- VET Quality Framework
- NSW State Records Act 1998
- ISO/IEC 27001:2013 - Information Security Management System

6.0 POLICY OWNERSHIP

Policy Owner	Head of Technology
Status	New
Approval Authority	Scentia Corporate Board with endorsement of the ABS Corporate Board and ACHW Corporate Board.
Date of Approval	26/04/2023
Effective Date	01/05/2023
Implementation Owner	Head of Technology
Maintenance Owner	Head of Compliance
Review Due	1 March 2026
Content Enquiries	Mike Kumar - Head Technology Email: mkumar@scentia.com.au

7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C32.0	26 April 2023	Head of Technology	New policy for Scentia Group staff and students