

# Information and Record Management (DLI) Procedure

## Section 1 - Preamble

- (1) This Procedure is effective from 2<sup>nd</sup> of March 2026.
- (2) This Procedure is made under the following legislation:
  - a. Law No. 43 of 2009 on Archives (Indonesian Archive Law)
  - b. Law No. 14 of 2008 on Transparency of Public Information (Indonesian PID Law)
  - c. Law No. 27 of 2022 on Personal Data Protection (Indonesian PDP Law)
  - d. Regulation No. 18 of 2015 on Guidelines for Archive Retention in the Education and Training Sector (ANRI Reg 18/2015)

## Section 2 - Purpose

- (3) This Procedure documents requirements for the control of Deakin University Lancaster University Indonesia (DLI) data and information.

## Section 3 - Scope

- (4) This Procedure applies to all DLI data, information and records, whether received, created, maintained, copied, disseminated or disposed of by DLI in the course of its operations.
- (5) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s) concerned, and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

## Section 4 - Policy

- (6) This Procedure is pursuant to the Information and Records Management Policy.

## Section 5 - Procedure

### Information Management Framework

- (7) DLI will facilitate awareness and training activities for staff in relation to information and records management, including information classification and recordkeeping requirements.
- (8) Information Owners will implement information and records management practices for their organisational unit, including determining appropriate information classification.

- (9) Managers will ensure that their staff members, including consultants and contractors, are aware of and educated about information and records management, including the information classification and recordkeeping requirements appropriate to their role.
- (10) Staff will undertake the information classification and recordkeeping requirements required by their role, to preserve the confidentiality, integrity and availability of information, and will not damage, conceal or give unauthorised access to information.
- (11) If classification of information is unclear, the information must be protected in a manner consistent with the more secure of the possible classification levels until the information owner can apply the correct classification, which must be done within 20 working days of creation or receipt.
- (12) All Relevant Documents and files must be clearly labelled with one of the following designations:
  - a. strictly confidential
  - b. restricted to staff
  - c. restricted to staff and students
  - d. public.
- (13) The classifications will be applied as follows:
  - a. strictly confidential:
    - i. used for highly sensitive information; access strictly limited to a selected group or process
    - ii. access, distribution, retention and/or destruction of information is subject to restrictive regulatory obligations
    - iii. if compromised, would place the DLI in breach of its legal and regulatory responsibilities.
  - b. restricted to staff:
    - i. information available to DLI staff who need access to fulfill their operational duties, but not for public disclosure; commercial and competitive in nature
  - c. restricted to staff and students:
    - i. information available to DLI staff and students to enable operations, but not for public disclosure
  - d. public:
    - i. available to the general public; no adverse effects are expected to result from the wide circulation of this information.

### **Information storage**

- (14) DLI will prepare, adopt, and implement an Archival Retention Schedule (Jadwal Retensi Arsip or JRA) as per the Indonesian regulatory requirements outlined in ANRI Reg 18/2015.
- (15) All confidential, personal and proprietary Information will be stored, in the first instance, in primary storage devices.
- (16) Where there is a clear business requirement, copies of confidential, personal and proprietary Information may be temporarily stored on portable storage devices administered by DLI, but only where the storage device is physically secured to prevent unauthorised access and, if electronic, the files containing the Information are password protected.

- (17) Where there is a clear business requirement to have copies of confidential, personal or proprietary Information on devices provided by an external service provider, staff will submit requests to the DLI Information Manager or nominee as stated in the Data Use Agreement and/or Privacy Impact assessments, who will determine whether to approve the request.
- (18) All data and information held electronically will be stored and secured according to technology standards defined by the DLI Information Manager or equivalent.
- (19) Information will be stored for a minimum duration of 5 years as recommended under ANRI Reg 18/2015.

### Access

- (20) The Head of Organisational Unit that is responsible for devices or applications in which information is managed or stored, will ensure that access to those devices or applications is given on a needs basis and that access rights are reviewed at least annually.

### Disposal

- (21) Staff will not dispose of a record except:
  - a. with the prior approval of the DLI Rector or COO, inline with the Disposal Schedule.
- (22) Staff will not destroy information where the information:
  - a. is, or is reasonably likely to be, required in evidence in a legal proceeding, or
  - b. is the subject of a request for access received by DLI under the Law No. 14 of 2008 on Public Information Disclosure.

### Archives

- (23) DLI will assess and manage records judged to be of archival value or requiring long-term storage and preservation.

### Breaches

- (24) All members of DLI should immediately report any suspected or perceived breach of the Information and Records Management policy, Procedure or Guidelines, or associated legislation, to their relevant Head of Organisational Unit in the first instance, the DLI Information Manager or as appropriate under other legislative and policy provisions.
- (25) Breaches will be investigated, rectified as needed, and disciplinary action will be taken as appropriate.

## Section 6 - Definitions

- (26) For the purpose of this procedure:
  - a. **Data:** individual facts or items of content, including symbolic representations that may form the basis of information (e.g. a date, a name, a number).
  - b. **Disposal:** the removal of records from an active recordkeeping system for: - destruction or deletion immediately or at a nominated future date; OR retention and preservation in an archive.
  - c. **Information:** a collection of data in any form, which may be transmitted, manipulated, and stored, and to which a meaning has been attributed. Information may include, but is not limited to: a written document, an electronic document, a webpage, an email, a spreadsheet, a

photograph, a database, a drawing, a plan, a video, an audio recording, a label or anything whatsoever on which is marked any words, figures, letters or symbols which are capable of carrying a definite meaning to anyone.

- d. **Information Owner:** the person who is responsible and accountable for information and records management for an organisational unit of DLI and who will ensure appropriate storage, access, use, distribution and disposal of the information and records.
- e. **Record:** recorded information created, received, used or maintained by DLI in the transaction of business which provides evidence of DLI activities. Records contain information which reflects what was communicated or decided or what action was taken and therefore constitutes the evidence of activities.
- f. **Relevant Documents:** any document or file produced by an employee of DLI in the course of their duties containing personal or commercially sensitive information.

## PROCEDURE DETAIL

<b>Name of policy</b>	Information and Records Management (DLI) Procedure
<b>Overarching legislation</b>	<ol style="list-style-type: none"> <li>1. Law No. 43 of 2009 on Archives (Indonesian Archive Law)</li> <li>2. Law No. 14 of 2008 on Transparency of Public Information (Indonesian PID Law)</li> <li>3. Law No. 27 of 2022 on Personal Data Protection (Indonesian PDP Law)</li> <li>4. Regulation No. 18 of 2015 on Guidelines for Archive Retention in the Education and Training Sector (ANRI Reg 18/2015)</li> </ol>
<b>Approved by</b>	Yayasan Governing Board
<b>Approval date</b>	27 <sup>th</sup> of February 2026
<b>Date of effect</b>	2 <sup>nd</sup> of March 2026
<b>Version</b>	V1.0
<b>Date of review</b>	Within 12 months.
<b>DLI Approval</b>	Joint Management Committee 26 <sup>th</sup> of February 2026
<b>Responsible Executive</b>	The Responsible Executive is a member of Executive whose portfolio covers the policy area.
<b>Implementation Officer</b>	The Implementation Officer is assigned by the Responsible Executive and is a staff member with management responsibility for the activity addressed by the policy.
<b>Policy/procedure superseded</b>	N/A
<b>Associated documents</b>	Information and Record Management (DLI) Policy DLI Information and Records Management website
<b>Summary</b>	This Procedure documents requirements for the control of Deakin University Lancaster University Indonesia (DLI) data and information.
<b>Key words for online searching</b>	Data, Disposal, Information.
<b>Category</b>	Administrative
<b>Target audience</b>	Staff