

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 1 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
Effective Date: <i>04 November 2022</i>		Revised by: Ms. Liza Wang Li Sze (Deputy CEO)	Revised Date: <i>03 November 2022</i>
Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>


Document History and Version Control Table				
Date Created/ Modified	Version No.	Supersedes Version No.	Amendment Description	Prepared by
Created 20 November 2016	1.0	N.A.	Establishment of Operation Manual for EduTrust Criterion 2.6.2 Confidentiality and Security of Information Procedure	Ms Liza Wang Li Sze
Modified 17 September 2017	1.1	1.0	<ul style="list-style-type: none"> Revised the Criterion No and Title from 2.6.2 Confidentiality and Security of Information Procedure to 2.5.1 Confidentiality and Security of Data and Information Procedure Revised the Sub Criteria from 2.6 Management of Information to 2.5 Data, Information and Knowledge Management Revised document no from GSTM-OM-2.6.2 to GSTM-OM-2.5.1 	Ms Liza Wang Li Sze
Modified 15 December 2018	1.2	1.1	<ul style="list-style-type: none"> Additional reference documents added in ref 1 Revised within 4 weeks to 3 weeks (Ref 4.17) 	Ms Liza Wang Li Sze
Modified 14 December 2019	1.3	1.2	<ul style="list-style-type: none"> Replaced GSTM-PM-C2.6.2 to GSTM-PM-C2.5.1.1 (Refer to Ref 3.3) 	Ms Liza Wang Li Sze
Modified 11 December 2020	1.4	1.3	<ul style="list-style-type: none"> Added Head of Academic to authorise staff to review academic staff personal files. (Refer to Ref 4.3.1) Removed the soft copy of non-academic staff personal file (Refer to Ref 4.3.1) Added the authorised staff by Head of Finance for Academic and non-academic staff payslips (Refer to Ref 4.3.1) 	
Modified 12 July 2021	1.5	1.4	<ul style="list-style-type: none"> Change the wording "is applicable" to "applies" (Refer to Ref 2.1) 	Ms Liza Wang Li Sze

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 2 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
Effective Date: <i>04 November 2022</i>		Revised by: Ms. Liza Wang Li Sze (Deputy CEO)	Revised Date: <i>03 November 2022</i>
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			<ul style="list-style-type: none"> Rewrite the sentence from "Access to files containing personal data should be monitored by the department head" to "The department head should monitor access to files containing personal data" (Refer to 4.2.1) 	
Modified 25 May 2022	1.6	1.5	<ul style="list-style-type: none"> Renamed the Operation manual title from "Confidentiality and Security of Data and Information Management Procedure" to "Data and Information Management." Revised the purpose of the operation manual (Ref 1.1) Added the data and information management procedures Updated table in Ref 4.3.1 by adding .csv file and Student and Graduate Performance Data Summary Report Review Ref 6.1 to reflect the process is reviewing the Management of data and information for continual improvement 	Ms Alyssia Wong Siew Yoong
Modified 01 November 2022	1.7	1.6	Added the External Academic Partnership Agreement/ MOU/ Contract, Student Recruitment Agent contract and Industry Partners (Internship Companies) Industrial Attachment Programme Agreement – Table at Ref 4.3.1 under Ref 4 Securing Privacy and Confidential Data	Ms Alyssia Wong Siew Yoong

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 3 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Ref.	Processes	Documentation
1	PURPOSE	Cross-reference to Data and Information Management Policy, Privacy Policy and Work Instruction and Email Usage Policy
1.1	This Operation procedure describes how the School manages the data and information, including the security and confidentiality of students, graduates and staff data and information and sensitive information like assessment materials and results are maintained, and such information is handled in safe and secure ways.	
2	SCOPE	
2.1	The process applies to all staff on how personal data and sensitive information must be stored, handled and protected.	
3	DATA AND INFORMATION MANAGEMENT SYSTEM PROCEDURES	Refer to:
3.1	Responsibilities	
3.1.1	The Management's responsibility is to nominate and form team members by 1 November annually for data collection and analysis for measuring and evaluating the achievement of all key performance indicators (KPIs) and related targets in the strategic plan.	
3.1.2	The nominated team members shall prepare a list of relevant internal and external data for analysis to be approved by Management before the data and information collection.	• List of relevant internal and external data and information
3.1.3	All department heads shall verify, confirm, and approve that the internal data and information are valid, accurate and reliable before the nominated team members use it for the analysis.	
3.1.4	The Academic Director is to verify, confirm and approve the external data's accuracy, validity and reliability before the nominated team members use it for analysis.	
3.1.5	The nominated team members shall prepare the analysis reports to assist the Academic Director/Head of Academic in preparing the GSTM Annual Reports.	• GSTM Annual Reports
3.1.6		

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 4 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>


Ref.	Processes	Documentation
3.2	The Top Management and Management will review the GSTM Annual Reports for discussion and decision-making in improving organisational performance.	
3.2.1	Collect data and manage information to measure and evaluate the achievement of all key performance indicators and related targets in the strategic plan for decision-making	
3.2.2	The nominated team members shall prepare the list of relevant internal and external data aligned with the Strategic Plan to be approved by the Management before the data collection.	<ul style="list-style-type: none"> • Strategic Plan • Approved list of internal and external data and information
3.2.3	The approval from the Management will give the nominated team members access to collect data and information from the respective departments and other external sources.	
3.2.4	The Management shall consider the following before approving the nominated team members' access to internal data and confidential information: <ul style="list-style-type: none"> • To whom data can be disclosed • Whether laws, regulations, or contracts require data to remain confidential • Whether data may only be used or released under certain conditions • Whether data is sensitive by nature and would have a negative impact if disclosed • Whether data would be valuable to those who aren't permitted to have it (e.g. hackers) 	<ul style="list-style-type: none"> • Minutes of Management Meeting
3.2.5	A notification to all department heads of the nominated team members accesses right to the approved list of internal data and information approved by the Management.	
3.2.6	Each department shall collaborate and give access to the nominated team members according to the approved list.	
3.3	The individual department shall keep a record of the nominated team members accessing the data and information in each department.	

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 5 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>


Ref.	Processes	Documentation
3.3.1	Establish a system to keep and manage data and relevant information of all students, graduates and staff All staff shall comply with confidentiality and security policy, privacy policy and Work Instruction Internet and Email Usage Policy in keeping and managing all students, graduates, and staff data and relevant information. (Cross-reference to Data and Information Management Policy – Clause 2 Item I, II, III & IV)	Refer to: <ul style="list-style-type: none"> Employee handbook Non-Disclosure Agreement
3.3.2	All staffs need to secure confidential data and information in GSTM.	
3.3.3	All staff granted access to confidential information must sign the "Non-Disclosure Agreement" with the Head of Human Resources.	
3.3.4	Confidentiality and security information policy is communicated to all staff when they begin their employment with GSTM.	
3.3.5	During the pre-course counselling and orientation day, students must be briefed that their personal information is confidential and secure by GSTM.	
3.3.6	The Head of Human Resources will brief this policy on all staff on their first day of employment.	<ul style="list-style-type: none"> Application Form – Pre-course counselling section
3.3.7	The CEO appointed staff / a staff team as the School's Data Protection Officer (DPO).	<ul style="list-style-type: none"> GSTM Student Handbook
3.3.8	The responsibilities of DPO may include, but are not limited to, the following: <ul style="list-style-type: none"> ensure compliance with PDPA when developing and implementing policies and processes for handling personal data; foster a data protection culture among staff and communicate personal data protection policies to stakeholders; <ul style="list-style-type: none"> Manage personal data protection-related queries and complaints; Alert Management to any risks that might arise concerning personal data; and Liaise with the PDPC on data protection matters, if necessary. 	<ul style="list-style-type: none"> BCU Student Handbook
3.3.9		

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 6 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>


Ref.	Processes	Documentation
3.3.10	It is the responsibility of the CEO/ Deputy CEO to conduct spot checks on staff's compliance with security procedures.	
3.4	All departments shall keep and manage up-to-date data and relevant information of all students, graduates and staff.	
	Ensure the accuracy, reliability and accessibility of compiled data	
3.4.1	The management access right allows the nominated team to collect data and information within the organisation.	
3.4.2	The department head allows the nominated team members to access the approved internal data and information list.	
3.4.3	The nominated team members shall export the data and information in a .csv file	• .csv file
3.4.4	All data and information exported to a .csv file shall be secured and protected with a password.	
3.4.5	The nominated team members shall be confirmed with the department heads of the data and information exported to ensure the data's validity, accuracy and reliability before they are analysed.	
3.4.6	The nominated team members will collect the relevant data approved by the Management from external sources for external data.	
3.4.7	The compiled external data must structure correctly in the .csv file. All .csv files validated shall be secured with a password.	
3.4.8	After the .csv file is ready, it shall be validated by the Academic Director to confirm and approve that the data is accurate and reliable before it becomes available for analysis.	
3.4.9	All the data and information compiled for analysis are accessible by the Academic Director and nominated team members for analysis.	
3.4.10	All data and analysis results in .csv files shall be locked and protected with passwords, and the nominated team members and	

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 7 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: Modified 01 November 2022
Effective Date: 04 November 2022		Revised by: Ms. Liza Wang Li Sze (Deputy CEO)	Revised Date: 03 November 2022
Next Review Date 22 December 2023		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: 04 November 2022


Ref.	Processes	Documentation
.5	Academic Director will keep the password. (Cross-reference to Data and Information Management Policy – Clause 2 Item IV) Ensure the availability of required organisational data and information in a timely manner to relevant stakeholders	
3.5.1	Each department shall maintain up-to-date organisational data and information in a timely manner to relevant stakeholders (e.g., Students, Graduates, University Partners, Employers, Council Private Education (CPE) and other relevant government bodies) (Cross-reference to Data and Information Management Policy – Clause 1- Item (d))	
3.5.2	The nominated team members are responsible for preparing the analysis report and assisting the Academic Director/Head of Academic in preparing the GSTM Annual Report.	
3.5.3	The GSTM Annual Report and Student and Graduate Performance Data Summary Report will be presented to the Top Management and Management during the Annual Management Review Meeting. (Cross-reference to Ref 3.7.4)	<ul style="list-style-type: none"> • GSTM Annual Report • Student and Graduate Performance Data Summary Report
3.5.4	The Student and Graduate Performance Data Summary Report are also presented to the Academic Board for approval before it is available for students, graduates and staff. (Cross-reference to Ref 3.7.7)	
3.5.5	The nominated team members are responsible for ensuring the Student and Graduate Performance Data Summary Report shall be readily available for all staff, students and graduates. (Cross-reference to Measurement of Student and Graduate Outcomes Policy and Measurement of Student and Graduate Outcomes Procedures Operation Manual)	
3.6	Ensure the confidentiality and security of all data and information kept, including electronic data, course assessment materials and results (Cross-reference to Ref 4)	
3.6.1	All staff in handling and managing confidentiality and security of all data and information kept, including electronic data, course assessment materials and results, shall comply to: <ul style="list-style-type: none"> • Confidentiality and Security policy (Clause 2 Item V and VI) 	<ul style="list-style-type: none"> • Cross-reference to

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 8 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
Effective Date: <i>04 November 2022</i>		Revised by: Ms. Liza Wang Li Sze (Deputy CEO)	Revised Date: <i>03 November 2022</i>
Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>


Ref.	Processes	Documentation
3.6.2	<ul style="list-style-type: none"> Confidentiality and Security of Data and Information Procedure Privacy Policy Work Instruction Internet and Email Usage Policy <p>All staff must comply with the policies set by GSTM and all relevant legislative and regulatory requirements in Singapore.</p>	Data and Information Management Policy – Clause 2 Item V & VI
3.7	Leverage a systematic process to analyse comparative data and information to drive organisational performance	
3.7.1	The nominated team members shall analyse the data and information collected for measurement and evaluation of the achievement of all key performance indicators (KPIs) and related targets in the strategic plan for decision-making	
3.7.2	The nominated team members prepare the analysis reports to assist the Academic Director/ Head of Academic in preparing the GSTM Annual Report before the Annual Management Review Meeting.	
3.7.3	The GSTM Annual Report will be presented to the Top Management and Management during the Annual Management Review Meeting.	
3.7.4	During the Annual Management Review Meeting, Top Management and Management will review the following: <ul style="list-style-type: none"> GSTM Annual Report Student and Graduate Performance Data Summary Report Strategic Plan 	<ul style="list-style-type: none"> Minutes of Annual Management Review Meeting Report GSTM Annual Report Student and Graduate Performance Data Summary Report Strategic Plan
3.7.5	Top Management and Management review the analysis results and discuss the strategic direction and decision-making, including a strategy to improve the overall organisational performance to ensure that the School is on track to achieve its vision and mission.	
3.7.6	The CEO shall approve any adjustment to the Strategic Plan before implementation. (Cross-reference to Strategic Plan Policy and Procedures)	

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 9 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>


Ref.	Processes	Documentation																				
3.7.7	The Student and Graduate Performance Data Summary Report will also be presented to the Academic Board to improve the quality of courses offered.	<ul style="list-style-type: none"> Minutes of Academic Board Meeting Student and Graduate Performance Data Summary Report 																				
3.7.8	The Academic Board shall approve the Student and Graduate Performance Data Summary Report before available to students, graduates and staff. (Cross reference to Measurement of Students and Graduate Outcomes Policy and Procedures).																					
4	SECURING PRIVACY AND CONFIDENTIAL DATA	Refer to:																				
4.1	Information in hard copy is stored in files and folders in a locked cabinet. Access to the locked Cabinet is only opened to authorised staff.	<ul style="list-style-type: none"> Privacy Policy at GSTM's website Confidentiality policy printed on all relevant forms (e.g. application forms) whenever students and staff provide personal data or information to the GSTM 																				
4.2	For information in soft copy, data information access levels are restricted by a system administrator.																					
4.3	The type of data is confidential, and it needs to be secured as follows:																					
4.3.1	<table border="1"> <thead> <tr> <th>Confidential Data</th> <th>Type</th> <th>Location and Use</th> <th>Assess and Storage</th> </tr> </thead> <tbody> <tr> <td>Student Personal File</td> <td>Hard Copy</td> <td>Document stored and locked on Cabinet</td> <td>Authorised staff by the Head of Student Support Services</td> </tr> <tr> <td>Student Personal File</td> <td>Soft Copy</td> <td>Archived at Student Management System</td> <td>Authorised staff by the Head of Student Support Services</td> </tr> <tr> <td>Non-Academic Staff Personal File</td> <td>Hard Copy</td> <td>Document stored and locked on Cabinet</td> <td>Authorised staff by Head of Human Resources</td> </tr> <tr> <td>Academic Staff Personal File</td> <td>Hard Copy</td> <td>Document stored and locked on Cabinet</td> <td>Authorised staff by the Head of Human Resources or Academic</td> </tr> </tbody> </table>		Confidential Data	Type	Location and Use	Assess and Storage	Student Personal File	Hard Copy	Document stored and locked on Cabinet	Authorised staff by the Head of Student Support Services	Student Personal File	Soft Copy	Archived at Student Management System	Authorised staff by the Head of Student Support Services	Non-Academic Staff Personal File	Hard Copy	Document stored and locked on Cabinet	Authorised staff by Head of Human Resources	Academic Staff Personal File	Hard Copy	Document stored and locked on Cabinet	Authorised staff by the Head of Human Resources or Academic
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		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 10 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Ref.	Processes				Documentation
				Director/Head of Academic	
	Lecturer Contract; Consultant Contract	Hard Copy	Document stored and locked on Cabinet.	Authorised staff by Academic Director/Head of Academic	
	External Academic Partnership Agreement/ MOU/ Contract	Hard Copy	Document stored and locked on Cabinet.	Management Team	
	Student Recruitment Agent Contract	Hard Copy	Document stored and locked on Cabinet.	Authorised staff by Sales and Marketing Staff	
	Industry Partners (Internship Companies) Industrial Attachment Programme Agreement	Hard Copy	Document stored and locked on Cabinet.	Authorised staff by Academic Director/Head of Academic	
	Assessment Papers & Assessment Results, Certificate and Transcript.	Hard Copy	Document stored and locked on Cabinet	Authorised staff by Academic Director/Head of Academic	
	Examination Database and Records of Certificate and Transcript	Soft Copy	Archived at Server	Authorised staff by Academic Director/Head of Academic	
	Student and Graduate Performance	Soft Copy	Archived at Server/ Uploaded at	Authorised staff by Academic	

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 11 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Next Review Date <i>22 December 2023</i>		Approved by: Mr. Linus Wang Ann Ning (CEO)	Approved Date: <i>04 November 2022</i>

Ref.	Processes				Documentation
4.4	Data Summary Report		Student Portal Announcement Document	Director/Head of Academic	
	.csv files for analysis	Soft Copy	Archived at Server	Authorised staff by Academic Director / Head of Academic	
	Academic and non-academic staff Pay Slip	Hard Copy	Document stored and locked on Cabinet	Authorised staff by Head of Finance	
	Receipt	Hard Copy	Document kept on student p-file, stored and locked on Cabinet	Authorised staff by Head of Finance	
	Receipt	Soft Copy	A record at Student Management System and Student Portal Account	All staff	
4.5	All personal computers (PC) and laptops should be password-protected to prevent unauthorised use and unauthorised access to information on the devices.				
4.6	All PC and laptops must not contain unauthorised, unlicensed or personally licensed software, and all software must be authorised and procured through the Human Resources Department.				
4.7	Anti-virus/Anti-spyware/Personal Firewall software must be installed and updated on all PCs and laptops. These PC and laptops should be subjected to regular virus checks using this software.				
4.8	Human Resources Department should ensure that when providing a laptop/portable device (e.g. mobile phone) for staff use, each device is authorised for use by a specifically named individual. The responsibility for the physical safeguarding of the device will then rest with that individual.				

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 12 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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Ref.	Processes	Documentation
4.9	Laptops must be physically secured if left in the office overnight. When out of the office, the device should be kept secure at all times in a locked cabinet.	
4.10	Staff should ensure that callers to the office or other unauthorised persons cannot view personal or sensitive information on paper documents or information displayed on PC monitors, etc.	
4.11	All staff should ensure that PCs are logged off or 'locked' when left unattended for any period (e.g. in Windows, using Ctrl+Alt+Del keys).	
4.12	Personal and sensitive information should be locked away when not in use or at the end of the day.	
4.13	The confidentiality policy should be printed on all relevant forms (e.g. application forms) whenever students and staff provide personal data or information to the GSTM.	
4.14	All new students will receive a Student Portal Account within 3 weeks from the Student Support/Service Department. The Student Support/ Service Department created and managed the User name and password.	
4.15	All University Partner's students will receive Moodle Account and email account from University Partner within 3 weeks. The University Partner manages the Moodle Account.	
4.16	All staff have an official email account from the Head of Human Resources.	
4.17	All staff should be aware that they are prohibited from using their personal email account to communicate with students and/or external stakeholders.	
4.18	In order to minimise incidents of unauthorised access and/or incidents of lost/stolen data, Human Resources Department restricts the use of personal storage media and devices (e.g. USB memory sticks, etc.) to staff that are required to use these media/devices for business / official purposes.	
4.19		

		OPERATION MANUAL	
		Criterion 2 - Corporate Governance and Administration	
		Sub Criteria: 2.5 Data, Information and Knowledge Management	Page 13 of 13
		Criterion No.: 2.5.1 Data and Information Management	
Document No.: GSTM-OM-C2.5.1	Version No.: 1.7	Prepared by: Ms. Alyssia Wong Siew Yoong (Academic Director)	Date Created / Modified: <i>Modified 01 November 2022</i>
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	<p>Only storage media provided by the Human Resources Department should be permitted for use within the School.</p> <p>The department heads should monitor access to files containing personal data on an ongoing basis. Staff should be made aware that this is being done.</p>	
5	BREACH MANAGEMENT	Refer to:
5.1	<p>A data security breach can happen for a number of reasons, including:</p> <ul style="list-style-type: none"> • Loss or theft of data or equipment on which data is stored (including break-in to School's premises); or • Equipment failure; or • Human error; or • Unforeseen circumstances such as a flood or fire; or • A hacking attack. 	<ul style="list-style-type: none"> • Sample of Legal letters • Sample of the police report
5.2	<p>If a breach occurs (refer to Ref 5.1), the Management should consider the following:</p> <p>(a) seek legal advice; or</p> <p>(b) lodge a police report on the alleged theft by the ex-employee; or</p> <p>(c) lodge a complaint on the matter with the Personal Data Protection Commission ("PDPC"); or</p> <p>(d) change access code to Student Management System / Office / Devices / etc.; or</p> <p>(e) combination of (a) to (d)</p>	
5.3	Any recommended policies and/or procedures changes should be documented and implemented as soon as possible.	
6	REVIEW OF SYSTEM AND PROCEDURE	Refer to:
6.1	The Management shall review the processes and procedures for data and information management systems and the confidentiality and security of information procedures at least once a year for continual improvement.	<ul style="list-style-type: none"> • Minutes of Annual Management Review Meeting