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Document Management and Records Retention Policy and Procedures

1. Purpose

This policy establishes a clear framework for the creation, storage, retention, and disposal of all records and documents managed by Insight Academy. It ensures that records are secure, accurate, accessible, and retained for the appropriate length of time and as required by the privacy regulations. The policy supports accountability, transparency, operational effectiveness, data provision, continuous improvement, quality assurance and the privacy rights of individuals. This includes ensuring personal information is collected lawfully, used only for legitimate purposes, disclosed only where authorised, and protected against unauthorised access, loss, or misuse.

2. Scope

This policy applies to:

- All student records (enrolment, progress, attendance, assessment, certification)

- All administrative and financial records

- All staff records, compliance reports, and governance documents

This policy also governs the handling of personal information of students, staff, agents, contractors, and other stakeholders in all formats (digital, paper, audio, visual), from collection through to disposal. All systems and users responsible for document handling and privacy.

3. Policy Statement

Insight Academy treats records and documents, whether created digitally or in physical format, as strategic assets and critical enablers of educational quality, operational transparency, and compliance assurance. Records are not merely administrative instruments — they represent the formal evidence of training, assessment, student engagement and experience, decision-making, certification as well as operational governance. Thus, Insight Academy takes all reasonable and

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proactive measures to ensure that the records remain accessible, secure, reliable, and aligned with compliance obligations and good governance.

This policy positions records management as a strategic function that supports the integrity of the RTO's operations, protects students' rights, and strengthens organisational resilience. All record management processes incorporate privacy-by-design principles, ensuring that data minimisation, consent management, and lawful disclosure obligations are met in line with the Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs). Insight Academy ensures that all personal information is handled in a lawful, fair, and transparent manner, with clear purposes, appropriate access controls, and data minimisation.

Guiding Principles: The following principles guide the implementation of this policy:

- Integrity and Reliability**:** All records are accurate, complete, and verifiable. Recordkeeping processes are designed to support confidence in academic and administrative decisions.

- Security and Confidentiality**:** Records are protected from loss, misuse, and unauthorised access. Confidential information—particularly student and staff data—is safeguarded through technical and procedural controls.

- Transparency and Accessibility**:** Insight Academy ensures that records remain accessible to authorised users when required and are available for audit, student requests, or regulator review.

- Consent and Privacy: The collection and use of personal information is limited to what is necessary. Individuals are informed of how their data is used. Privacy protection measures are embedded at every stage of the record lifecycle, ensuring transparency, purpose limitation, and individual rights of access and correction.

- Defined Responsibilities**:** Roles in records management are clearly assigned. All staff are responsible for adhering to recordkeeping procedures relevant to their function, supported by training and system access appropriate to their role.

- Lifecycle Management and Preservation**:** Records are created, maintained, and securely disposed of in accordance with defined retention schedules and operational needs, preserving their value throughout their lifecycle.

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- Compliance and Auditability: Recordkeeping practices align with current regulatory, contractual, and policy obligations, enabling Insight Academy to produce required documentation during audits, investigations, or student requests.
- Culture of Quality and Improvement: Record management processes are reviewed regularly to strengthen systems, reduce risk, and ensure alignment with evolving standards of educational quality and data governance.

Record Retention Requirements

Record Type	Minimum Retention Period	Storage Location
AQF Certification Records	30 years	SMS & secure server
Completed Assessment Items (including CT & RPL)	2 years after competency judgement	LMS, SMS, or Internal Drive
Overseas Student Records (Enrolment forms + Written Agreements + Payment Receipts, Personal info, General admin docs., Transfer + Release requests, Attendance, Other student Requests etc.)	2 years post cessation of enrolment	SMS
Complaints and Appeals	5 years	Internal Drive
Critical Incident Records	2 years post-cessation of enrolment	Internal Drive
Staff training/qualification logs	7 years after staff separation	HR files in Internal Drive
Financial Records	7 years	Finance system

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4. Procedure

The following procedures ensure documentation and records retention compliance.

4.1 Document Creation and Continuous Improvement

- All official documents are created and stored in designated folders and systems.

- File names and versions follow agreed naming conventions and recorded in the *Version Control Register.*

- Insight Academy team ensures all documents are reviewed periodically as a continuous improvement process or when feedback is received.

- The updates made to any documents are recorded into the *Continuous Improvement Register* and the *Version Control Register* is updated accordingly.

4.2 Records Access and Student Details Updates

- Records access remains limited to authorised staff based on operational responsibilities.

- Current students can access their records via the Learning Management System (LMS). Past students may request access to their records by submitting a written request to Insight Academy Student Support team.

- Insight Academy ensures that, at least every 6 months, while the student remains an accepted student, the student's residential address, mobile phone number, and email address are confirmed in writing and updated accordingly.

4.3 Privacy Requirements

- Insight Academy collects only the information required to deliver its services.

  - Types of personal information collected - contact details, identification, academic, financial, visa, health, emergency contacts.

  - Collection methods - forms, admin processes, authorised third parties.

  - Purpose of collection - training delivery, compliance reporting, support services, HR.

- Individuals are notified at the time of collection about how their data will be used.

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- Personal information is used only for the stated purpose unless consent is provided, or law permits disclosure

- Data is stored securely, and access is restricted.

- Students and staff can access their personal information upon request and request correction if inaccurate.

- Breaches of privacy are reported and managed according to internal procedures.

4.4 Record Storage, Backup and Disposal

All storage and disposal activities must protect personal information from unauthorised access or disclosure. Privacy safeguards, including restricted access permissions, and secure destruction methods, are mandatory for records containing personal information.

- Digital records are stored on access controlled secure servers.

- Daily backups are automated, with full backups conducted monthly.

- Backups are stored off-site and accessible only by the CEO or a delegated officer.

- Physical records are kept in locked storage where applicable.

- Access remains restricted via user permissions and secure platforms.

- Records disposal follows defined retention periods and records are destroyed securely (digital deletion or document shredding).

- Superseded documents are kept electronically in the Archive folders.

4.5 Data Reporting and Disclosure of Information

- Insight Academy collects and maintains all required data through its Student Management System (SMS) and regulatory reporting platforms such as PRISMS.

- Student information is submitted as part of regular data and compliance reporting timelines such as AVETMISS data reporting.

- Information relating to a student is not released without the written consent of the student, or where relevant, the student's parent or guardian accepts the requirements of disclosure in insisting with law enforcement agencies.

- All disclosures are documented and retained for a minimum of seven (7) years.

- Disclosure to External Agencies may be made in certain circumstances as below.

Agency	Type of Disclosure
Police	Must provide identification and where possible, a written request. Handled by the CEO.
Legal firms and Finance companies	Disclosures are made with the written student authorisation.
Ombudsman	The Ombudsman is legally empowered to request information. Thus, Information released per statutory power.
Freedom of Information (FOI)	- Disclosure under the Freedom of Information Act (October 1985) usually excludes any personal information or identification. - Requests must be in writing and state that the information is requested under the Freedom of Information Act. - Insight Academy is allowed 45 days to respond to FOI requests.
Department of Home Affairs (DHA)	- Under the ESOS Act, DHA has the authority to request international student details. - The department must provide a written request to release information.
Regulatory Agencies	Disclosure as required under the National Vocational Education and Training Regulator Act 2011 (Cth), including during compliance audits.

4.6 Audit and Review

- Record-keeping systems are reviewed annually.
- Internal audits of document compliance are incorporated into the RTO's annual quality assurance schedule.
  Non-compliance or risks are reported to the CEO with corrective actions initiated.

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5. Supporting Documents

- Version Control Register

- Continuous Improvement Register

6. Related Policies

- Student Information Policy and Procedures

- Student Enrolment and Written Agreement Policy and Procedures

- Unique Student Identifier (USI) Management Policy and Procedures

- Critical Incidents Management Policy and Procedures

- Student Transfer between Providers Policy and Procedures

- Feedback, Complaints and Appeals Policy and Procedures

- AQF Certification Document Issuance Policy and Procedures

- Risk Management Policy and Procedures

- Continuous Improvement Policy and Procedures

- Financial Management and Business Viability Policy and Procedures

- Leadership and Accountability Policy and Procedures

7. Roles and Responsibilities

CEO: Oversees policy implementation and authorises retention, disposal, and access protocols.

Operations/ RTO Manager: Implements system and privacy controls, manages academic record access, archival and supports staff awareness.

Compliance Coordinator: Monitors compliance to policy, leads staff trainings, and prepares for audits.

Trainers and Assessors (Coaches): Keeps accurate and timely records of assessment and feedback.

- **Admin Officer:** Maintains enrolment, admin, certification data and handles personal information according to privacy protocols.

- **All Staff:** Handles personal information of students and peers according to privacy protocols.

- **IT Administrator (Outsourced):** Manages digital system security, backups, and access controls.

8. Legislative Background

This policy is guided by the following legislative and regulatory frameworks:

- Section 10 of the Compliance Requirements within the Compliance Standards for NVR Registered Training Organisations 2025 under the National Vocational Education and Training Regulator Act 2011 (Cth).

- Standards 2.4, 3.6, 6.8, 7.7 and 9.1 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 under the Education Services for Overseas Students Act 2000 (ESOS Act).

- Section 19 Giving information about accepted students; Section 21 Record keeping of the Education Services for Overseas Students Act 2000 (ESOS Act)

- NVETR (Data Provision Requirements) 2020

- Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs)

- Privacy Amendment (Enhancing Privacy Protection) Act 2012

9. Monitoring and Improvement

This policy is reviewed annually or earlier in response to changes in regulatory requirements or audit outcomes. Review activities including, audit findings, and student, staff as well as industry feedback.