

RECORD MANAGEMENT POLICY

1. Purpose

- 1.1 This document applies to the **Innovative Institute of Australia**, its courses, its clients (students), and its controlled entities (collectively, "IIA", "Institute", "the Institute", "we", "us", "our").
- 1.2 The purpose of this policy is to ensure the Institute maintains all records necessary to demonstrate the effective operation of our management systems for all nationally recognised training courses.
- 1.3 This policy is implemented in compliance with the requirements of the Education Services for Overseas Students Act 2000 (the ESOS Act), the Standards for Registered Training Organisations (2025), and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code 2018).
- 1.4 In this file, words that import gender include all other genders; the singular 'they' is gender-neutral and used to avoid specifying a person's gender; words in the singular number include the plural and vice versa.
- 1.5 This policy does not affect students' rights under the Australian Consumer Law.
- 1.6 The Institute reserves the right to amend these terms and conditions at any time.
- 1.7 This policy does not affect students' rights under the *Australian Consumer Law*.

2. Definitions

- 2.1 A record refers to a written, printed, or electronic document providing evidence that activities have been performed.
- 2.2 Master file refers to the digital file of the latest version/ revision of a document saved in the Compliance drive.
- 2.3 Working file refers to the digital file or paper-based version of the latest version/revision of a document saved in the Common drive. This document is issued

for operational use.

- 2.4 Appeal period refers to a period in which a student is permitted to challenge the results of an assessment or of a non-training-related decision.
- 2.5 Management System refers to a framework of structures, policies and processes used to ensure that the organisation can achieve its objectives.
- 2.6 Wisenet refers to an AVETMISS-compatible Student Management System.
- 2.7 An education agent refers to an entity (in or outside Australia) that
- i. Engages in any of the following activities in relation to a provider:
 - A. The recruitment of overseas students, or intending overseas students;
 - B. providing information, advice or assistance to overseas students, or intending overseas students, in relation to enrolment;
 - C. otherwise dealing with overseas students, or intending overseas students;and
 - ii. is not a permanent full-time or part-time officer or employee of the Institute.
- 2.8 Agent Agreement refers to the agreement between the Institute and the agent, including the schedules.
- 2.9 CRICOS refers to the Commonwealth Register of Institutions and Courses for Overseas Students.
- 2.10 ESOS Act refers to the *Education Services for Overseas Students Act 2000 of the Commonwealth of Australia*.
- 2.11 National Code refers to the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*.
- 2.12 Prospective student/applicant/client refers to a person who intends to become, or who has taken any steps towards becoming, an 'overseas student' or 'intending overseas student' as defined by the *ESOS Act*.
- 2.13 DHA refers to the Department of Home Affairs.

- 2.14 OSHC refers to the Overseas Student Health Cover.
- 2.15 eCoE refers to the electronic Confirmation of Enrolment.
- 2.16 2025 Standards for RTOs refers to the *National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025*.

3. Policy

- 3.1 The Institute will retain, archive, retrieve and transfer student and assessment records in accordance with the requirements of the Australian Skills Quality Authority (ASQA).
- 3.2 The Institute's staff are expected to be knowledgeable about the proper handling of records and documents, including record retention requirements.
- 3.3 The Institute shall maintain client records of attainment of units of competency and qualifications for a period of 30 years.
- 3.4 The Institute shall comply with all laws relating to record keeping. All student information is confidential and is available only to the students themselves, to a person authorised by them, or when requested by a legal authority.
- 3.5 Students have the right to timely access to current and accurate records of their participation and progress.
- 3.6 The Institute's records management system will confirm the quality of our training and assessments. Student records of evidence of participation and completion of units and qualifications will be submitted to the regulatory authorities in accordance with the prescribed frequency and requirements.
- 3.7 The Institute ensures that accurate and complete records are created and maintained in line with the Public Records Act 1973 (VIC), Privacy and Data Protection Act 2014 (VIC), Privacy Act 1988, and the Electronic Transactions (Victoria) Act 2000 for all students and information related to Training Services.

3.8 The Institute maintains a list of all records with its retention schedule.

3.9 Storage

- i. All records are kept secure, and all confidential information is safeguarded.
- ii. All hardcopy records are kept under lock and key at the Institute's principal campus. When determining whether to transfer records off-site, the responsible operational area must consider factors such as security, cost, available space, and the required level of accessibility.
- iii. All hardcopy records must be kept to avoid fire, flood, termites, or other pests, and be available for perusal by auditors of regulatory bodies during scheduled audits. The Institute will retain copies of records if the originals are destroyed and/or inaccessible.
- iv. Converting paper documents to electronic format via secure scanning processes is also a recognised option for document storage.
- v. Electronic records are access-limited and password-protected where required.
 - A. Information on the mechanism by which the material can be retrieved must also be retained.
 - B. All electronic copies of documents are on appropriate hardware and in online cyber-secured folders.
 - C. The Institute's administration team regularly backs up electronic data.
- vi. Student records of competency determination, as well as enrolment data, are to be retained in the relevant course and/ or student file. For students funded under the Victorian Training Guarantee, enrolment data, including pre-course assessment and proof of eligibility, evidence of participation for each unit of competency, and current training plans, must also be kept in student files.
- vii. Personal records of staff are kept in a personal file with validated copies of qualifications and resumes. Such information on qualifications and experience is updated annually.

3.10 Collection of information, privacy and confidentiality

- i. Information is collected on application and during student enrolment and/or the course of employment of staff to meet the Institute's obligations under the Education Services for Overseas Students Act 2000 (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018; to ensure student compliance with the conditions of their visas and their obligations under Australian immigration laws generally.
- ii. The authority to collect this information is contained in the Education Services for Overseas Students Act 2000 (ESOS Act), the Education Services for Overseas Students Regulations 2001 and the National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- iii. Information collected on application and during the course of enrolment can be provided, in certain circumstances, to the Australian Government and designated authorities and, if relevant, the Tuition Protection Service (TPS)/Tuition Assurance Scheme (TAS) and the ESOS Assurance Fund Manager. In other instances, information collected from the student can be disclosed without their consent where authorised or required by law.
- iv. The Institute will comply with all requirements relating to record keeping, including the record keeping requirements of the Public Records Act 1973 (Vic), Privacy and Data Protection Act 2014 (Vic), Privacy Act 1988 and the Electronic Transactions (Victoria) Act 2000 for all students and information related to Training Services.
- v. Information about students and staff is confidential. Information is not disclosed to any third party unless required by law, which prescribes the right of access for any approved Government officer. Students are made aware that the Institute will not allow access to their personal information without obtaining their written consent.
- vi. When enrolling, students sign a confidentiality waiver to allow government authorities to access their academic and personal details on demand.

- vii. Both staff members and students have the right of access to students' files.
- viii. Students are required to contact the Institute to request access to their files.
Students need to state the purpose of the access and exactly what records are to be reviewed.
- ix. Where students require access to the database to review records, they shall not be allowed unsupervised access. A printout of the database showing attendance and/or performance data will be issued.
- x. Students may authorise third parties to access their personal files by providing written permission to the Institute and outlining the nature of information that may be accessed and whether it may be copied and issued to the enquirer.

3.11 Student records

3.12 Individual student records are retained in a student file. Student records are scanned for electronic storage upon withdrawal or on completion.

3.13 Student hard copy records are stored in a locked filing cabinet, while scanned records are retained as secure digital or electronic (scanned) records ('soft copy'). Access is provided only to those authorised to view them through password control and a hierarchical access model. All student records in soft copies are uploaded into the Student Management System (Wisenet).

3.14 A student's file of hard copies of records will consist of

- i. The items listed on the Student Documents Checklist.
- ii. Copy of driver's license or passport pictorial page.
- iii. Application/enrolment forms.
- iv. Written agreements made with students.
- v. All correspondence and records of contacts with the student to date.
- vi. Copies of completed assessment activities.

3.15 A soft copy of student records is retained on the server.

- 3.16 The Institute will retain, and make available to ASQA or its auditors for audit purposes, all records relating to admissions:
- i. For all Nationally Accredited Training that is conducted by the Institute, participant records will be retained according to the following schedule:
 - A. Admission documents - two (2) years from cessation of studies
 - ii. Under the VTG Funding Contract, participant records will be retained according to the following:
 - B. Admission and eligibility documents - at least seven (7) years after the relevant Eligible Individual has completed or withdrawn from the relevant training course or qualification in which they are enrolled
- 3.17 Records (AVETMISS data-compliant) will be retained in soft copy for 30 years, with sufficient information to reissue the qualification or statement of attainment if required. These records will be transferred to ASQA or its successor, in hard copy and soft copy, at no cost, should the Institute cease operations.
- 3.18 **Completed assessment records**
- i. The data maintained must be sufficiently detailed to enable independent assessors to make informed and valid assessment decisions in line with the standards set by the Institute, and must include:
 - A. Name of the assessor who assessed the student;
 - B. Date of the assessment;
 - C. Summary of assessment outcomes;
 - D. Actual pieces of students' work (including evidence collected for the RPL process);
 - E. Result of the assessment for each assessment task and for the units of competency;
 - F. Feedback was given to the student, and
 - G. All other information deemed necessary to demonstrate the assessor's judgement of the student's performance against the standard required.

- ii. For all Nationally Accredited Training that is conducted by the Institute, participant records will be retained according to the following schedule.
 - A. Completed Assessment work - 24 months from the date competency is achieved in the unit.
 - B. Assessment Outcome of each Approved Unit - 24 months from cessation of studies.
 - C. Keeping the following records for a minimum of 2 years, following cessation of studies by a student, as per the requirements of the ESOS Act:
 - i. A student's current residential address.
 - ii. The total amount of course monies paid.
 - iii. Copies of any written agreements between the Institute and the student.
 - iv. Any amounts that have become payable to the provider by the student for the course that have not been paid
- iii. Records of Assessments where a student is assessed: the Institute will retain electronic learner records of attainment of units of competence and qualifications for a period of 30 years in accordance with Schedule 5 of the Standards for Registered Training Organisations 2015, and these records are accessible to current and past learners.

3.19 Staff records

- i. All staff have a personal file for storing essential records, as listed on the Staff Document Checklist.
- ii. Staff records demonstrate trainers' competence across the courses they instruct, and records of validated qualifications are maintained in a separate folder of trainer qualifications.

3.20 Student management system

- i. The "Wisenet" is an AVETMISS-compatible Student Management System that is used to electronically store:

- A. Course and Training Package details, including Units of Competency
 - B. Learning Outcomes
 - C. Assessor Details
 - D. Student details and student records
 - E. Defining Groups
 - F. Linking Assessors to Courses
 - G. Enrol Students to Courses
 - H. Assigning Students to Groups
 - I. Student Results
 - J. Compilation Reports
 - K. The detailed submission of data into the Wisenet is the responsibility of the Administration Manager or, in their absence, a staff member delegated by the Institute's CEO.
 - L. The Wisenet is used to submit student data as required by ASQA.
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 - iii. The Wisenet is used to submit student data as required by ASQA.

3.21 External reporting requirements

- i. State and Federal Government bodies require student course data records to be submitted in a format to suit their systems.
- ii. The Institute will supply such data as required from the Management System in the format determined by ASQA and Victorian Skills.
- iii. All records are submitted to State and Federal Government bodies using compliant reporting software, which specifies the data and format required for submission. The operator is to ensure that data submission has been effective.

- iv. The Institute's Administration Manager is the officer officially appointed to report to the Department of Education or its successor via PRISMS. Support is provided by the Institute's CEO.
- v. The Institute's Administration Manager issues breach notices for students through the PRISMS system; these contain the information listed in the CRICOS requirements issued by the Department of Education.
- vi. The Institute will use as its student management system one that can provide the National VET Regulator with AVETMISS-compliant data.

3.22 Destruction of records

- i. Records are destroyed by industrial disposal only at the end of that period of time at the direction of the document "owner" defined in the table at the end of this document.
- ii. Student records are not to be destroyed unless specifically directed by the Institute's CEO.
- iii. Staff records are destroyed 10 years after the staff member has left employment.

3.23 Locating records in the event of closure

- i. All student records that are required to be kept are to be relocated to the ASQA, in hard copies and soft copies, within 30 days in the event of
 - A. Cessation of operations, or
 - B. The Institute's registration has been cancelled.
- ii. The Institute shall forward the following data to the ASQA
 - A. Details of every student's full name, address, date of birth and student ID number.
 - B. Units of competency completed, including title and national code, number and date achieved.
 - C. Qualifications/Statements of Attainment issued to each student, including title, national code and date issued.

- iii. The Institute shall provide a copy of the following records if they have not already been issued:
 - A. A testamur for each qualification.
 - B. Statement of attainment for units that have been completed
 - C. Evidence of assessments undertaken, if there are still assessments required to be completed to allow the issue of a Statement of Attainment of Qualification.
- iv. The location of the documents is to be formally agreed to by ASQA prior to the records relocation.

3.24 Continuous improvement

- i. This policy and its implementation are based on the Plan-Do-Check-Act (PDCA) continuous improvement model adopted by the Institute. The PDCA cycle drives ongoing improvement in the management of information across the organisation.
- ii. Ongoing improvement in the management of information and information systems is essential to the Institute's compliance with regulatory obligations, particularly in relation to the protection of personal information and corporate reporting requirements.
- iii. Adopting a continuous improvement approach supports informed decision-making, especially in areas affecting the effective management and safeguarding of personal information and commercially sensitive data.
- iv. The Institute continually strengthens its capacity to manage the collection, use, storage, transfer, and disposal of information by applying the Plan-Do-Check-Act (PDCA) cycle-through data collation (PLAN), comparative analysis (DO), regular self-assessment (CHECK), and reflective practices (ACT).

VERSION HISTORY

Version Number	Date	Summary of changes
1.0	September 2021	New policy
2.0	July 2025	Revised and updated to include the changes according to the Standards for Registered Training Organisations (2025).
3.0	December 2025	Revised and updated to include the changes according to the ESOS 2000 Act.