



Driver Academy
AUSTRALIA

Data and Record Management Policy and Procedures

Version 2.0 – February 2026

Website: www.driveracademyaustralia.com.au

Email: enquires@driveracademyaustralia.com.au

Mobile: 0415 059 019

Address: 20 Elizabeth Street, Tanunda SA 5352

Version Control

Item	Summary of update	Version	Review date
1	New comprehensive Policy and Procedures document created to replace old, outdated policy suite.	v2.0	23/02/2026
2			

Quality area	Student Support; Governance; Product Integrity; Accountability
Author	Driver Academy Australia / Access Industry Solutions
Status	Approved
Approved by	Paul Tanner
Approval Date	02/03/2026

Copyright

Copyright, Intellectual Property, Professional Lien and Moral Rights

1. Ownership of Intellectual Property

All intellectual property rights, including copyright and any other proprietary or statutory rights, in all documents, materials, works, deliverables, methodologies, templates, frameworks, training and assessment materials, reports, data, and other content created, authored, developed, or supplied by AIS (the *Works*), whether in draft or final form, remain the sole and exclusive property of AIS, unless expressly agreed otherwise in writing. No right, title, or interest in the Works is transferred to the Client except as expressly set out in the Client Services Agreement and this copyright notice.

2. Entity-Specific Use and Non-Transferability

Any licence or right granted under this Agreement to use the Works is granted solely to the specific legal entity identified as the Client in the Client Services Agreement.

The licence:

- is personal to that entity; and
- must not be assigned, transferred, sublicensed, novated, shared, or otherwise made available to any other entity, including (without limitation) related bodies corporate, partners, shareholders, directors, officers, contractors, affiliates, successors, stakeholders, joint venture participants, or any other third party, whether now or at any time in the future, without the prior written consent of AIS, which may be granted or withheld in AIS's absolute discretion.

Any unauthorised transfer, sharing, or use of the Works by another entity constitutes a material breach of the Client Services Agreement and an infringement of AIS's intellectual property rights.

3. Professional Lien

AIS retains a professional lien over all Works created or supplied under the Client Services Agreement and this copyright notice.

Notwithstanding any other provision of the Client Services Agreement:

- AIS is not required to release, licence, assign, or provide final or editable versions of any Works; and
- the Client acquires no right to use, reproduce, publish, distribute, or rely upon the Works, until all outstanding invoices, fees, disbursements, and any accrued interest owing to AIS have been paid in full.

This lien survives termination or expiry of the Agreement.

4. Limited Licence (If Applicable)

Subject to full payment of all amounts owing, AIS may grant the Client a non-exclusive, non-transferable, non-sublicensable, revocable licence to use the Works solely for the purpose expressly agreed in writing and only for the benefit of the Client entity named in the Client Services Agreement.

Any use outside that agreed purpose or by any other entity constitutes an infringement of AIS's intellectual property rights.

5. Moral Rights and Integrity of Works

AIS does not waive and expressly reserves all moral rights (as defined in the *Copyright Amendment (Moral Rights) Act 2000 (Cth)*) in respect of all Works created by AIS under the Client Services Agreement and this copyright notice.

Without limiting the foregoing, the Client must not, without the prior written consent of AIS (which may be granted or withheld in AIS's absolute discretion):

- a) fail to attribute AIS as the author of the Works, or falsely attribute the Works to another person;
- b) amend, adapt, edit, alter, distort, crop, reformat, translate, excerpt, or otherwise modify the Works; or
- c) (c) do, or omit to do, any act in relation to the Works that would, or may reasonably be expected to, be prejudicial to AIS's honour, professional reputation, or standing.

6. Conditions on Consent

Where AIS provides consent under this notice, such consent may be subject to **reasonable conditions**, including but not limited to:

- mandatory attribution wording;
- quality control and audit requirements;
- version control and approval processes;
- restrictions on context, audience, format, or medium of use; and
- immediate withdrawal of consent if conditions are breached.

7. No Implied Consent

Nothing in this Agreement, any Client Services Contract, Statement of Work, or related document operates as a consent by AIS to any act or omission that would infringe AIS's moral rights or intellectual property rights, except to the extent expressly agreed in writing by AIS.

8. Survival

This clause survives termination or expiry of any Agreement and continues in full force and effect.

Contents

Purpose.....	5
Definitions.....	5
Scope.....	5
Responsibilities.....	5
Alignment.....	6
Policy.....	7
Principles.....	8
Record Management Types.....	8
Data Collection.....	9
Procedures.....	9
Secure Storage and Access Control.....	9
Maintenance and Updating of Records.....	9
Retention and Disposal of Records.....	10
USI Portal and AVETMISS Data Collection.....	11
Certification Issuance.....	11
Document Development.....	11
Version Control.....	12
Data Breach Management.....	12
Staff Training and Management.....	12
Policy Governance.....	12

Purpose

The purpose of this policy is to outline the principles and procedures for managing learner data and records for Driver Academy Australia (The Academy). This policy ensures that all records, including learner information, assessment results, and administrative data, are securely stored, accurately maintained, and disposed of in compliance with the *Outcome Standards and Compliance Standards for National Vocational Education and Training Regulator (NVR) Registered Training Organisations (RTOs) Instruments 2025* and relevant privacy legislation.

Definitions

- **ASQA** means Australian Skills Quality Authority, the national VET regulator and the RTO's registering body.
- **Compliance Standards** refers to the Compliance Standards for National Vocational Education and Training Regulator (NVR) Registered Training Organisations (RTOs) Instrument 2025.
- **Data Security** refers to measures taken to protect electronic and physical records from unauthorized access, theft, alteration, loss, or destruction.
- **Learner Records** refers to documents and data related to learners, including (but not limited to) enrolment details, assessment results, attendance records, course progress, and other personal information.
- **Outcome Standards** refers to the Outcome Standards for National Vocational Education and Training Regulator (NVR) Registered Training Organisations (RTOs) Instrument 2025.
- **Records Management** means the systematic control of records throughout their lifecycle, including (but not limited to) creation, maintenance, use, storage, and disposal, in a manner that supports operational and compliance requirements.
- **Retention Period** refers to the duration for which records must be kept in accordance with regulatory or legal requirements before they can be disposed of.
- **Student Management System (SMS)** refers to a software solution designed to manage all aspects of student data and administrative processes within a training organisation. It streamlines operations, enhances efficiency, and helps RTOs meet compliance requirements.

Scope

This policy applies to all staff involved in the creation, storage, management, and disposal of records within The Academy. It covers all types of records, including electronic and hardcopy records, learner files, assessment results, financial records, and other administrative documents related to the operations of The Academy.

Responsibilities

- Chief Executive Officer / Training Manager
- RTO Manager
- Trainers and Assessors
- Student Liaison team

Alignment

Outcome Standards and Compliance Standards for National Vocational Education and Training Regulator (NVR) Registered Training Organisations (RTOs) Instruments 2025*

***Please note:** the information below, including number formatting, while inconsistent, is a direct reflection of the regulatory instruments and number formatting as endorsed by the regulator ASQA.

Outcome Standards:

Standard 2.1

VET students have access to clear and accurate information concerning the organisation, the relevant training product, and students are made aware of any changes that may affect them.

Performance indicator:

An RTO demonstrates:

- a. all information provided to VET students by the organisation or any third parties is clear, accurate and current;
- b. how it identifies which information VET students require prior to their enrolment and how that information is communicated to VET students prior to their enrolment;
- c. the following information is easily accessible to VET students:
 - i. the training product code and title, duration, modes of delivery, training delivery, location, training commencement dates, scheduling, any requirements to commence or complete the training product including assessment requirements, whether any licencing or occupational licence requirements apply, and details of any third party arrangements that apply to the delivery of the training;
 - ii. the training support services and wellbeing support services that are available to the VET student, and how the student can access those services;
 - iii. all fees, costs and charges associated with the provision of the training product which VET students may incur, including payment terms and conditions, any applicable refund policies and the availability of any relevant government training entitlements and subsidies;
- d. any obligations or liabilities which may be imposed on VET students undertaking the training product, including any obligations requiring VET students to acquire any materials, equipment or IT, any costs and processes associated with withdrawing from training, and costs and processes associated with obtaining a Student Identifier, and any requirements for VET students to undertake work placements;
 - i. the organisation provides all VET students with documentation prior to enrolment or before any fees are required to be paid which sets out:
 - ii. the training which the organisation or third parties will provide the VET student;
 - iii. all fees, costs and charges which the VET student will be required to pay; and
 - iv. any obligations or liabilities which may be imposed by the organisation or third parties on the VET student; and
- e. that it informs VET students, as soon as practicable, of any changes to training products or the organisation's operations that may affect VET students, including any changes relating to the transition of superseded, deleted, or expired training products.

Standard 4.1

A registered training organisation operates with integrity and maintains accountability for the delivery of quality services.

Performance Indicator:

An RTO demonstrates:

- a. the organisation and its governing persons are fit and proper persons, having regard to the Fit and Proper Person Requirements made under section 186 of the Act, as in force from time to time;
- b. its governing persons are suitable persons to oversee the operation of the organisation;
- c. its governing persons act diligently and make informed decisions which facilitate compliance with this instrument [these Standards] and any other instrument [the Compliance Requirements] made under section 185 of the Act, as in force from time to time; and
- d. the governing persons lead a culture of integrity, fairness and transparency in the organisation's delivery of services.

Compliance Standards

10. Records of AQF certification documentation and assessments

A registered training organisation must:

- a. maintain a register in accordance with the AQF Qualifications Register Policy of all:
 - i. AQF qualifications it is authorised to issue; and
 - ii. AQF qualifications and VET statements of attainment the organisation has issued to VET students;
- b. retain records, in accordance with the AQF Qualifications Register Policy, of all AQF certification documentation issued to VET students for a period of **thirty years**;
- c. retain records of all assessments submitted by a VET student to the organisation or a third party for a period of **2 years** after the student has completed the training product;
- d. ensure VET students – including those previously enrolled with the organisation – are able to access copies of their AQF certification documentation retained under paragraph (b); and
- e. upon request from the VET Regulator, provide a report of all AQF qualifications and VET statements of attainment the organisation has issued during the period specified in the Regulator's request.

20. Compliance with laws

A registered training organisation must comply with all applicable Commonwealth, State and Territory laws, including, for example, by ensuring:

1. personal information is collected, used and disclosed by the organisation in accordance with all applicable privacy laws; and
2. the organisation complies with all applicable requirements under the *Student Identifiers Act 2014*.

Policy

The Academy is committed to maintaining high standards of data and records management to ensure the integrity, confidentiality, and security of all information. The Academy will implement robust systems and procedures to ensure that all records are managed in accordance with regulatory requirements, supporting operational efficiency, compliance, and continuous improvement.

The Academy's policy statements for records management are as follows:

- The Academy maintains accurate, complete, and reliable records of its operations, including training delivery, assessment processes, learner support services, and administrative processes;
- The Academy ensures that its records are created, maintained, and disposed of in accordance with the relevant legal, regulatory, and accreditation requirements;

- The Academy provides training and support to its staff to ensure that they understand the importance of records management and are equipped with the necessary knowledge and skills to create, maintain, and dispose of records effectively;
- The Academy records management system is secure, reliable, and accessible to authorised staff as needed;
- The Academy regularly reviews and updates records management policies and procedures to ensure that they are aligned with best practices and the changing regulatory and accreditation requirements;
- The Academy ensures that records are stored in a manner that preserves their integrity, confidentiality, and accessibility, and that they can be retrieved and accessed easily and quickly when required;
- The Academy maintains records of training, assessment activities and full learner files for a period of 2 years from date of graduation;
- The Academy maintains records of certification for a period of **30 years** in accordance with the relevant regulatory and accreditation requirements; and
- The Academy ensures that records are disposed of in a timely and secure manner in accordance with the relevant retention and disposal schedules.

Principles

The Academy's data and records management practices are guided by the following principles:

- **Accuracy and Integrity:** Records must be accurate, complete, and reliable, reflecting the true nature of transactions, assessments, and other activities;
- **Confidentiality and Security:** Records must be securely stored and protected from unauthorised access, ensuring the privacy and confidentiality of learner and organisational information;
- **Compliance:** Records management practices must comply with relevant standards, including the Standards outlined above, the *Privacy Act 1988*, applicable state and federal legislation, and licensing requirements that may be state / territory specific; and
- **Retention and Disposal:** Records must be retained for the required retention period and disposed of securely and responsibly once they are no longer required.

Record Management Types

The Academy is required to manage different types of records across its RTO operations, including but not limited to:

- **Learner Records:** Pre-enrolment Registration, Enrolment forms, identification documents, attendance records, assessment results, feedback, progress reports, CVs and resumes, payment records and course completion and graduation records.
- **Assessment Records:** Evidence of assessments, including completed assessment tasks, observation checklists, assessor feedback, videos and photographic evidence, portfolios, third-party reports and references and validation documentation.
- **Administrative Records:** Financial records, staff records, training and assessment strategies, policies, procedures, and compliance documentation.

Data Collection

As a registered training organisation (RTO), The Academy collects a learner's personal information so the Academy can process and manage the enrolment in a vocational education and training (VET) course with The Academy. The Academy uses a learner's personal information to enable the RTO to deliver VET courses to learners, and otherwise, as needed, to comply with its obligations as a RTO.

The Academy's data collection processes are actioned in accordance with its *Privacy Policy and Procedures*.

Procedures

Secure Storage and Access Control

Electronic Records Management

The Academy has implemented specialist systems to ensure ongoing compliance, including:

- **Secure Systems:** Electronic records will be stored in secure, password-protected systems with appropriate encryption and access controls. The Academy will use reliable software systems, including aXcelerate SMS (student management system) and LMS (learning management system), to manage electronic records.
- **Access Permissions:** Access to electronic records will be restricted based on job roles and responsibilities. Only authorised staff will have access to specific records to ensure data security and privacy.
- **Data Backups:** Regular data backups will be conducted to ensure that records are protected against data loss due to technical failures, cyber-attacks, or other incidents. Backups will be stored securely offsite or in cloud-based storage with appropriate security measures.

Physical Records Management

The Academy understands the obligations of RTOs in relation the storage and access of physical records, including:

- **Secure Storage:** Hard copy records will be stored in locked cabinets or secure rooms with access restricted to authorised personnel. Records must be kept in a controlled environment to prevent damage, theft, or loss.
- **Access Logs:** Access to physical records will be monitored and logged to ensure accountability and prevent unauthorised access.

Maintenance and Updating of Records

The Academy will manage and update records in accordance with this policy and regulatory requirements to ensure:

- **Accuracy and Timeliness:** All records must be kept up-to-date and accurately reflect the latest information. Staff responsible for record maintenance must ensure that data is promptly updated following assessments, enrolments, or changes in learner status.

- **Audit and Review:**
 - Regular audits of records will be conducted to verify their accuracy, completeness, and compliance with retention requirements.
 - All document authors or reviewers must follow a consistent approach to the development of documents, and follow all guidelines as set out in the below procedures. Document authors or developers must also ensure that prior to the development or revision of any document, approval to commence revision or development is granted by the CEO or RTO Manager or Compliance Manager (or their delegate).
 - Policies and procedures will be reviewed at least annually to ensure they are up to date, accurate and compliant. Other documents will be reviewed during continuous improvement processes. The compliance manager is responsible for ensuring that policies and procedures are reviewed by their due date.
 - Electronic files will be saved in the drafts folder on the company server until approved. Access to this folder may be restricted to staff involved in document development and review.
 - Files are archived as they are superseded by a new version.
 - Files will not be deleted other than by an appointed person for maintenance purposes and only where a backup of the data exists.
- **Document approval:**
 - All documents are subject to approval prior to use by any staff member. Approval must be given for every document by the authorised person specified within the below procedure.
 - Approved documents will be moved from the drafts folder and saved centrally for access by staff on the company document server.

Retention and Disposal of Records

The Academy will abide by all regulatory requirements and implement best practice approaches to the retention and disposal of records.

Retention Periods

- **Learner Records:** Learner records, including assessment results and course completion and graduation records, will be retained for a minimum of **30 years** as required by regulatory standards.
- **Learner Assessment Records:** Learner assessment records, including but not limited to assessment workbooks, practical skills assessment evidence will be retained for a minimum of **two (2) years** as required by regulatory standards.
- **Financial and Administrative Records:** These records will be retained for a minimum period specified by relevant legislation, typically **seven (7) years**.

Secure Disposal

- **Electronic Records:** Electronic records will be securely deleted from all systems, ensuring that data cannot be recovered or reconstructed.
- **Hard Copy Records:** Physical records will be disposed of through secure shredding or incineration to prevent unauthorised access to sensitive information. This may be conducted via external professional services.

USI Portal and AVETMISS Data Collection

The Academy has implemented additional measures to ensure compliance and the mitigation of human error when updating the USI Portal via the aXcelerate SMS and the AVETMISS Data Collection platform.

All staff uploading course information for new or superseded qualifications or individual units on The Academy's scope of registration must follow each step on the *USI Portal Flowchart* to ensure the following:

- The Packaging Rules for the qualification have been correctly applied, taking priority over any unit(s) that may have been superseded prior to qualification's delivery period ending;
- All information – including qualification / unit code and title as well as course parameters – is checked and any errors are corrected in aXcelerate before the AVETMISS platform is updated;
- Staff must not override any information in relation to qualification / unit code and title, and course parameters. If, in the event, incorrect information must be overridden, the staff member must check with The Academy's Compliance Manager prior to overriding the system.
- Any updates to aXcelerate must also be transferred to AVETMISS to ensure the changes are reflected across aXcelerate, AVETMISS and the USI Portal. Incorrect information could, in the most extreme circumstances, lead to qualifications / statements of attainment being deemed null and void and consequently on flowing licensing application and / or cancellation issues.

Note – AVETMISS automatically uploads to the USI Portal used to update a learner's USI Transcript.

Certification Issuance

All staff are required to complete the *Issuance of AQF Certification Checklist* to ensure that all information is correct prior to the RTO issuing any qualifications, records or results or statements of attainment (SOA), in accordance with The Academy's *AQF Certification Policy and Procedures*.

The completed checklist will be saved to each learner's file and spot checks will be conducted by the RTO Manager and / or Compliance Manager to ensure AQF certification compliance.

Document Development

All documents must be created in the formats that align with The Academy's *Brand Guidelines* to ensure consistency of documentation and implementation.

All documents must be named clearly so that others can easily interpret the purpose of the document. The document title must be followed by version control guidelines. The full document name with version control must appear on the title page of document (where relevant) as well as the document footer.

When developing policies and procedures and forms The Academy must adopt the appropriate templates.

All policy and procedure documents must be written using the policy or procedure template. The templates include the appropriate headings and format, and include a version control table on the second page of the

document – after the title page and before the contents page – which tracks document updates, operational or compliance areas, review and approval process and date.

Version Control

The Academy adopts the following version control process as outlined in the RTO's *Brand Guidelines*:

- **Version Sequencing:** A new sequence with final documents should commence as follows:
 - The first draft is v0.1 and the final version will become v1.0;
 - Significant updates and document developed will be converted to a new full number (e.g. v1.7 will become v2.0); OR
 - A minor update of v2.0 becomes v2.1 (e.g. changes to layout, grammar, spelling, typing errors etc)
 - Version control should be shown on file names and also in footers of all documents.
- **Dating documents:** All documents should be dated within the document itself (e.g. 15 August 2025) and in the file name (e.g. 15082025)
- **Staff Initials for Working Documents:** For documents in review by different people, initials should be added to the file as an additional check for future reference (e.g. Paul Tanner's version would say PT). This also ensures document recovery is easier if and when needed. The final version should have all initials removed.

Data Breach Management

Incident Response

In the event of a data breach or suspected data security incident, The Academy will immediately assess the situation, contain the breach, and take action to prevent further unauthorised access.

Reporting and Notification

Significant data breaches will be reported to relevant authorities including the police, and affected individuals will be notified in accordance with the *Privacy Act 1988* and any other applicable legislation.

Staff Training and Management

Academy Staff who are involved in records management will receive regular training on data security, privacy, and compliance requirements to ensure they are aware of their responsibilities and the regulatory requirements of RTOs.

Staff handling sensitive records will be required to sign confidentiality and privacy agreements, acknowledging their commitment to protecting learner and organisational information.

Policy Governance

All data and record management systems and approaches must be reviewed and approved by the CEO / Training Manager or RTO Training Manager before publication to ensure compliance with RTO standards and regulatory requirements.

The Academy will regularly monitor its data and record management processes to ensure ongoing compliance and will promptly address any non-compliant practices or areas of improvement identified, and document this in the *Continuous Improvement Register* accordingly.