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## Data Protection & Document Control Policy

### 1. Purpose

The purpose of this policy is to establish consistent, compliant, and secure processes for the creation, management, access, storage, protection, retention, and disposal of all documents and data held by AIAC.

This policy ensures:

- Only current and approved versions of documents are in use
- Records meet CASA, ASQA 2025, ESOS (if applicable), workplace, and legislative requirements
- Data is stored, accessed, protected, and destroyed securely
- A Quality Management System (QMS) is maintained

### 2. Scope

This policy applies to all:

- AIAC employees, contractors, instructors, examiners
- Training, operational, maintenance, administrative and HR documents
- CASA-required documentation
- RTO regulatory documents and student records
- Digital and physical data storage systems

**Students are covered under the Student Privacy & Personal Information Policy.**

### 3. Document Control Requirements

#### 3.1 Document Categories & Retention Requirements

AIAC complies with CASA and ASQA 2025 retention requirements. CASA retention periods are applied where stricter. A complete retention table is maintained as part of the Document Register.

We maintain an **Information Register** that identifies:

- The types of personal and operational information we hold

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- Where each type of information is stored (SharePoint, OneDrive, FSM, secure server, paper files)
- Who has authorised access
- Retention periods and destruction methods
- Any third-party systems used to store or process the information

The register is reviewed annually and whenever new systems or records are introduced.

## Document Type & Retention Period

### CASA & Operational Records

Instructor & Examiner Records	7 years
Induction Records	7 years
S&P Checks	7 years
Instructor Qualifications	7 years
Student Administrative Records	7 years
Student Flight Training Records	7 years
Flight Test Reports	7 years
Flight Examiner Reports	7 years
Copies of Licences	<b>30 years</b>
Flight Authorisation Sheets	7 years
Fuel Consumption Records	7 years
Maintenance Records	7 years
Aircraft Journey Logs	7 years
Flight Planning Documentation	6 months

### Management & RTO Records

General Correspondence	7 years
Internal Audit Records	7 years

Continuous Improvement Records	7 years
Incident & Accident Reports	7 years
DAMP Records	7 years
Personnel Records	7 years
Finance Records	7 years
Professional Development	7 years
Complaints & Appeals (Students)	2 years
Refund Requests	2 years
Enrolment Records	7 years
Student Written Agreements	2 years
General Student Correspondence	2 years
Qualifications & Statements of Attainment	30 years
Attendance & Leave	2 years
Marketing Material	2 years
Obsolete Documents	1 year

#### 4. Unauthorised Access and Data Breaches

Unauthorised access, release, loss, or misuse of information is considered a **data breach**.

Penalties apply under the Privacy Act and CASA regulations. Refer to the Personal Information and Privacy for more information.

#### 5. Data Backup Requirements

- FSM data is stored on an off-site server with daily backups
- OneDrive and SharePoint rely on Microsoft's enterprise backup systems

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## 6. Issuing Qualifications, Records of Results and Statements of Attainment

AIAC issues AQF documentation in accordance with:

- ASQA Standards 2025, Schedule 5
- AQF issuance rules
- USI Legislative Requirements

AIAC may reissue certificates upon request (fees may apply).

## 7. CASA Requirements

All flight operations and maintenance records must comply with the relevant CASA regulations and the P142E Exposition. Amendments to CASA manuals are managed by the HOO in accordance with P142E 1A3.3.2.

## 8. Obsolete Documents

- All outdated copies are removed from circulation by the compliance manager.

## 9. Disclose to Third Parties

We only share personal information with third parties when required for training, assessment, support, employment, or regulatory purposes. All third parties must comply with the Australian Privacy Principles and our contractual privacy requirements.

We undertake the following controls:

- Only the minimum necessary information is shared
- Third-party agreements include privacy and confidentiality clauses
- Access is audited and monitored
- Third parties must return or destroy data when no longer required
- We review third-party privacy compliance each year or when new providers are added

Examples include: CASA, ASQA, NCVER, Home Affairs, exam providers, IT providers, marketing partners (with consent).

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