Retention of Records Management Policy and Procedure

Purpose

This policy defines the retention and records management policy and procedure that is established and implemented by the Centre of Professional Learning and Education (CPLE | 88148), to comply with various regulatory and legislative requirements across the Australian Vocational Education and Training (VET) system.

Introduction

The objective of this policy and procedure is to govern, promote and manage records that are purposeful, controlled, and reliable in a manner to support the integrity of CPLE's operations, training and administration services. The maintenance of a well-structured records management system supports the continuous improvement of our operation and provides a basis for compliance with legal and quality assurance requirements. We are committed to retain records to ensure their accuracy and integrity.

This policy supports Clauses 2.1,3.4,7.5,8.1,8.2,8.4,8.5 of the Standards for Registered Training Organisations (RTO) 2015 and provides a compliance point of reference for the reader.

Authorisation

This policy shall be issued and endorsed under the RTO Manager.

Policy

For the purposes of this policy, records include:

- **Student results:** Student results include a record of the student's details, date of enrolment and results of training and assessment. This should include what units of competency (including unit codes) and the result the student achieved. This may include if the student withdrew, was assessed as competent or not-yet-competent, was recognised as competent through an RPL process or was issued recognition via credit transfer. Student results also include all relevant data elements relating to the Australian Vocational Education and Training Management Information Statistical Standards (AVETMISS).

- **Certificates, Record of Results & Statements of Attainment:** Certificates, Records of Results and Statements of Attainments (SOA) are documents issued to recognise the award of nationally endorsed and accredited outcomes. Qualifications and SOA's are formatted and prepared in accordance with the Australian Qualifications Framework (AQF). Certificates, Record of Results and SOA's are issued directly to students from CPLE's AVETMISS compliant, student management system (SMS), VETtrak. VETtrak holds a record of CPLE's qualification's register of qualifications and SOA's obtained by CPLE students.

- **Completed assessment**: Completed assessment items include documents or other media where

assessment evidence is obtained by students and assessment decisions and outcomes are recorded by CPLE trainers and assessors. It may be a combination of templates, questionnaires, checklists, summary sheets, RPL tools, or records of feedback from trainers and/or assessors to students. Assessment items and resources include all those items which substantiate the assessment decision made by trainers and assessors. ASQA refer to these records as "Completed student assessment items".

- **Assessment tools:** Assessment tools refer to the various templates, checklists and assessment records that CPLE uses over the term of its operations. This specifically refers to the retention of the versions (master copy) of tools used as opposed to retention of completed resources. The aim of retaining a record of versions used over time is to allow an appropriate record for future review by regulatory bodies. Examples of assessment tools are;
  - Workplace observation reports
  - Written answers to questions and case studies
  - Evidence of completed work placement hours
  - Project tasks and related evidence
  - Language, literacy and numeracy assessment
  - Marking Guides, assessment record tools and rubrics

- **Administrative records:** Administrative records are those documents which are used to facilitate the student's administration during their enrolment. Examples of administrative records are;
  - Enrolment and eligibility forms
  - Release of personal information forms
  - Invoices and receipts
  - Refund request forms
  - Training plans and Training Record Books
  - Employer Resource Assessment forms
  - Terms and conditions of enrolment forms
  - Certificates and statement of attainments

- **Student file:** The student file is simply the file location where all student results, completed assessment resources and administrative records are retained. Student files are currently stored electronically via the CPLE shared drive in SharePoint.

- **RTO management records:** RTO management records are those files which assist management and staff to coordinate RTO services. These may include;
  - Policies and procedures
  - RTO export reports (status reports, result reports contact records etc.)
  - Enrolment registers
  - Qualifications register
  - Attendance records
  - Financial records
  - Quality improvement records of complaints and appeals
  - Quality indicator reports
  - Satisfaction surveys

Storage of Records

To ensure records are maintained in a safe and suitable condition, the following is to apply:

- Records will be kept securely to prevent them being accessed by any non-authorised personnel. All electronic pathways to access such documents and details are

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**2** of **9**

password protected with permission given for access only by those permitted.

- Records are be kept confidential to safeguard information and to protect the privacy of students, employers and CPLE staff.
- Records are be kept to avoid damage by fire, flood, termites or any other pests. Electronic files are stored via cloud-based services. Archived documentation is stored off site via a hired service.
- Student results and Qualification / Statements of Attainments will be backed-up in an electronic format and will be available to be retrieved at any time for a period of (30) years.
- Electronic data storage will be safe from destruction by fire or flood and should take account of the risk of component failure of a single storage device. Electronic data is backed-up via the use of cloud-based systems. These systems are maintained by the Communities at Work ICT team as well as via the use of an external contractor, OPC.
- Paper records previously utilised by CPLE have been sent off-site to the archiving company, TIMG, for storage before destruction of files occurs. All paper records are scanned and saved in the student's electronic file. Documents are then securely destroyed via the use of shredding devices and/or secure document disposable bins.

Period of Retention

CPLE must comply with a range of record retention requirements including:
- ATO requirements relating to financial records.
- State Funding Authority requirements relating to training and assessment records, and
- ASQA General Direction: Retention requirements for completed student assessment items.

- **Record of Results / Qualifications / Statements of Attainment:** Record of Results / Qualifications and Statements of Attainment (100%) will be retained for a minimum of thirty (30) years.

- **Completed assessment resources:** Completed assessment resources (100%) will be retained for a minimum of seven (7) years from the date of student completion of, or withdrawal from training.

- **Assessment tools:** Assessment tools (100%) are to be retained for a minimum of seven (7) years. This requirement relates to the versions of these records.

- **RTO management records:** RTO management records are to be retained for a minimum of seven (7) years. This requirement relates to the versions of these records.

- **Administrative records:** Administrative records are to be retained for a minimum of seven (7) years. This requirement relates to the versions of these records and completed records.

Treatment of Records on Ceasing Operation

CPLE acknowledges that it has a responsibility to retain accurate copies of records to enable these to be transferred to ASQA should CPLE ceased to operate. It is a requirement that RTOs who cease to

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**3** of **9**

operate, must within 30 days of registration ending, forward to ASQA an electronic copy of the records for each student who were enrolled in a qualification during the period of registration.

This requirement does not include hard copy student files and relates specifically to electronic data providing evidence of activities the student has performed. For the purposes of this policy, CPLE will interpret "activities" to mean records providing information on the outcomes achieved by students. This will include records of qualifications and units of competency which have been issued by CPLE during the entirety of its registration period. CPLE will retain these records electronically and file them under RTO Reporting, AVETMISS.

Information will be provided in the form of the following AVETMISS reports in consultation with ASQA:

- Training Organisation File (NAT00010)
- Training Organisation Delivery Location File (NAT00020)
- Program File (NAT00030)
- Subject File (NAT00060)
- Client File (NAT00080)
- Client Postal Details File (NAT00085)
- Disability File (NAT00090)
- Prior Educational Achievement File (NAT00100)
- Training Activity File (NAT00120)
- Program Completed File (NAT00130)

These reports will be generated by year and supplied to ASQA in a suitable file structure and format to enable it to be navigated and used. The files will be in a nationally AVETMISS compliant format produced using our RTO's AVETMISS approved, VETtrak Student Management System (SMS).

Destruction of Records

The Chief Executive Officer and RTO Manager are the only persons who can authorise the destruction of records. Records are only to be authorised for destruction after the retention period has lapsed.

If in a paper-based format, documents identified for destruction will be shredded before being recycled. The archives register will be updated in the notes section to identify that a particular record has been destroyed. Electronic documents will be archived or deleted where required.

Email Records and Correspondence

In many cases, information relating to CPLE's operation will be transmitted using electronic communication. It is important that this information is also retained and archived.

Any email record, phone or face to face contact with a student, their employer or the State Training Authority (STA) which relates to administration, training and assessment services provided by CPLE is to be recorded against the student's enrolment contact record in VETtrak (SMS) and/or printed via a pdf format and saved within the students file for the sake of evidence.

Unique Student Identifier (USI)

The Student Identifiers Act 2014 was approved and came into effect from the 1st January 2015. Any USI provided to CPLE by a student must be verified with the USI Registrar. This may be achieved by inserting the USI into the student details within VETtrak and changing the USI status to "Verify".

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**4** of **9**

MASTER DOCUMENT – UNCONTROLLED WHEN PRINTED UNLESS SIGNED IN RED

02 6293 6500 | admin@commsatwork.org | PO Box 1066 Tuggeranong ACT 2901 | ABN 19 125 799 859 | commsatwork.org

VETtrak will verify any USI records with the USI Registrar.

Once verified the status will have changed to "Valid". If the status does not change to valid then one of the following student details in incorrect:

- First name
- Last name
- Date of Birth
- The Unique Student Identifier

These are the only data elements used to verify a USI so if it does not verify then one of these elements is incorrect. A common error is the abbreviation of the student's name. The student may have registered their USI with the first name of "Benjamin" but has completed the enrolment application form with the first name of "Ben". The first name provided by the student must align with the name they provided when they registered their USI.

Student Identifier details and all related documentation under the control of CPLE will be kept secure. This includes the information stored within VETtrak (SMS). User profiles and password protections for VETtrak are to be used by CPLE staff in order to prevent any unauthorised access to USI information. Further information on the Unique Student Identifier can be accessed via the following website: http://www.usi.gov.au/

Filing and Archiving of Records Procedure

The following procedure is to be followed by all CPLE staff when archiving student records on completion:

- Retain all records which record information about the evidence collected during training and assessment. Students may retain a copy of any work they have produced and submitted as evidence toward the assessment. Work submitted in an electronic version must be retained in the Learning Management System (LMS) used by CPLE – Canvas, with assessment record tools, feedback sheets and rubrics documents stored in the students' file in SharePoint.
- CPLE trainer and assessors must complete and update the student's training plan in line with the RTO Training Plan Policy and Procedure. All versions of the students training plan during the course of enrolment must be kept in the students file in SharePoint.
- CPLE trainer and assessors must accurately record all completed units of competency in the student management system VETtrak (SMS). Commencement dates for units are to align to the commencement quiz completion date in Canvas, with dates of competency achieved to align to the date that marked the last piece of assessment in Canvas being marked as satisfactory.
- CPLE trainer and assessors are to conduct a check of the student file on completion or withdrawal of a qualification to ensure that all evidence and assessment records correspond with VETtrak (SMS) and the units of competency being issued to the student.
- CPLE trainer and assessors are to provide students with constructive feedback relevant to the unit/module being assessed with as much detail as possible. Feedback is to be recorded and retained in the LMS used by CPLE – Canvas.
- CPLE trainer and assessors are to inform CPLE Administrative staff of a student's qualification

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**5** of **9**

MASTER DOCUMENT – UNCONTROLLED WHEN PRINTED UNLESS SIGNED IN RED

02 6293 6500 | admin@commsatwork.org | PO Box 1066 Tuggeranong ACT 2901 | ABN 19 125 799 859 | commsatwork.org

completion and/or withdrawal. CPLE administrative staff are then follow processes outlined in the RTO Completions and Withdrawal Policy and Procedure for the sake of compliance and record keeping.

Important to Note: CPLE trainer and assessors are to ensure that their observations and comments recorded onto completed assessment items are detailed and complete. It is an ASQA requirement that retained evidence of assessment must have enough detail to demonstrate the trainer/assessor's judgement of the student's performance against the standard required. If assessment records are received by administration for entry and archiving and they are deficient of detail, administration staff are instructed to return the assessment documentation to the trainer/assessor for further detail and completion. CPLE trainer and assessors who receive returned assessment documentation and who have issues with this arrangement are to refer their issue directly to the RTO Manager.

Administration

On notification of the student's enrolment/completion or withdrawal from their elected qualification, CPLE administrative staff are to action the following;

- As enrolment records are received by the RTO, administrative staff are required to set up the student's enrolment record and training contract information in the Student Management System VETtrak. File structures are to be created in SharePoint and relevant documents are to be scanned and appended to the relevant electronic file. This includes enrolment records and any documents required for the State Training Authority (STA) during the enrolment period of the student.
- When student enrolment is confirmed, are to send an email directly to the student and if necessary the employer. The email will include a confirmation of enrolment letter, invoice, training plan, enrolment check list and terms and conditions of enrolment. Access to the LMS will also be given with instructions for logging in.
- Liaise with CPLE trainer and assessors to complete the student training plan.
- Record any withdrawn and withdrawn not-started units of competency and record number of hours engaged as per AVETMISS requirements in VETtrak (SMS). Log in details and hours accumulated in Canvas will be used for this purpose.
- When a student has completed all required units of competency, and notification has been received from the student's assigned trainer/assessor:
  - Update the student's enrolment status in VETtrak (SMS) to record the completion or withdrawal of the student's training and enrolment.
  - Create the appropriate Certificate or Statement of Attainment (SOA) in VETtrak as per the RTO Completions and Withdrawal Policy and Procedure.
  - Produce two copies, one electronic copy for the student file and one printed copy to be issued directly to the student.
  - Create a confirmation letter confirming status in regards to enrolment and attach any relevant documentation such as a Certificate or SOA, email student from VETtrak and mail original to the student on confirmation all administration fees are paid in full.
  - Once completion or withdrawal has been finalised, CPLE Administration staff can proceed with archiving records. Move the student's electronic file to *Completed Students file* in SharePoint under the year of completion or withdrawal.

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**6** of **9**

MASTER DOCUMENT – UNCONTROLLED WHEN PRINTED UNLESS SIGNED IN RED

02 6293 6500 | admin@commsatwork.org | PO Box 1066 Tuggeranong ACT 2901 | ABN 19 125 799 859 | commsatwork.org

Important to Note: Administrative staff are to ensure that CPLE trainer and assessors have followed records procedure accordingly. Administration staff are required to ensure retained evidence of enrolment must have enough detail to demonstrate eligibility to be enrolled and the evidence gathered meets against the standard required. If an assessment record is received by administration for entry and archiving and is deficient of detail, administration staff are to return the assessment documentation to trainer and assessors for further detail and completion. Trainers who contact administration and who have issues with this arrangement are to be referred directly to the RTO Manager.

Definitions

Document	A piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record.
Record	A document or collection of documents that constitute a piece of evidence about the past, especially an account kept in writing or some other permanent form.
Records Management System	The practice or discipline of controlling and governing what are considered to be the most important records of an organisation throughout the records life cycle, which includes from the time such records are conceived through to their eventual disposal or archive.
USI Unique Student Identifier	A unique number for a student required when undertaking accredited training in Australia.
SMS	Student Management System in which students training contract information and progress is recorded. CPLE use VETtrak for this purpose.
LMS	Learning Management System whereby assessment evidence is submitted, marked, and retained by CPLE. CPLE use Canvas for this purpose.
AVETMISS	Australian Vocational Education and Training Management Information Statistical Standards. It is a national data standard that ensures consistent and accurate capture and reporting of Vocational Education and Training (VET) information about students.
STA	State Training Authorities are government departments in each state or territory responsible for the operation of the Vocational Education and Training (VET) system (including Australian Apprenticeships) within that jurisdiction. Each STA participates in the formulation of national policy, planning and objectives and promotes and implements the agreed policies and priorities in the State or Territory. In the ACT, the STA is Skills Canberra.

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**7** of **9**

MASTER DOCUMENT – UNCONTROLLED WHEN PRINTED UNLESS SIGNED IN RED

02 6293 6500 | admin@commsatwork.org | PO Box 1066 Tuggeranong ACT 2901 | ABN 19 125 799 859 | commsatwork.org

Responsibilities

Communities at Work [organisation]:

- Provide the necessary resources to develop, record and store all records management documentation.

RTO Manager

- Adhere to this policy and procedure accordingly and in line with compliance requirements outlined in the standards for Registered Training Organisations (2015).
- Ensure this policy is read, understood and adhered to by all CPLE staff.
- Oversee the implementation of RTO records management and retention requirements by conduction internal audits at least annually in line with STA requirements, funding agreements and compliance expectations. Where issues are identified, these are to be rectified immediately, communicated within the CPLE team and reported if and where required to the regulatory authority.

CPLE Administration Staff

- Adhere to this policy and procedure accordingly and in line with compliance requirements outlined in the Standards for Registered Training Organisations (2015).
- Inform the RTO Manager of any relevant non compliances, changes or suggestions for continuous improvement related to record management processes and requirements for RTO's.

CPLE Staff

- Adhere to this policy and procedure accordingly and in line with compliance requirements outlined in the Standards for Registered Training Organisations (2015).
- Inform the RTO Manager of any relevant non compliances, changes or suggestions for continuous improvement related to record management processes and requirements for RTO's

Related Documents:

1. ORG-QMS-POL-001 Purpose, Mission and Values
2. RTO-PRG-POL-011 RTO Reporting Obligations Policy and Procedure
3. RTO-PRG-POL-021 RTO Completions and Withdrawals Policy and Procedure
4. RTO-PRG-POL-016 RTO Enrolment and Induction Procedure

References

1. ISO 9001:2015 Quality Management System
2. ISO 3100: 2018 Risk Management
3. ISO 45001: 2018 Occupational Health and Safety
4. AS ISO/IEC 27004:2018 Information Security Management
5. Standards for Registered Training Organisations (2015)
6. Privacy Act 1988
7. National Vocational Education and Training Regulator Act 2011
8. Data Provision Requirements 2020
9. Student Identifiers Act 2014

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**8** of **9**

MASTER DOCUMENT – UNCONTROLLED WHEN PRINTED UNLESS SIGNED IN RED

Document Contact

GRC Administration

P: 02 6293 6500
E: grc@commsatwork.org

Review Specifications

OFFICE USE ONLY			
Written/reviewed by	**Authorised for release by**	**Version number**	**Signature of authorising person**
Carla Scalia	Carla Scalia	2.0	Text
Chloe Brewer	Chloe Brewer	2.0	Text
VERSION HISTORY			
Version:	**Date of Effect:**	**Brief Summary of Change:**	
1.0	25/07/2018	Original	
2.0	08/12/2021	Update to existing document	

Document Type	Doc Ref No	Version No	Date of Effect	Due for Review	Page
Policy	RTO-PRG-POL-010	2.0	15/06/2023	15/06/2025	**9** of **9**

MASTER DOCUMENT – UNCONTROLLED WHEN PRINTED UNLESS SIGNED IN RED

02 6293 6500 | admin@commsatwork.org | PO Box 1066 Tuggeranong ACT 2901 | ABN 19 125 799 859 | commsatwork.org