Communities@Work

Retention of Records Management Policy & Procedure

Purpose:

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

For the purpose of this policy the following legislative requirements and regulations apply;

- Australian Privacy Principles
- Privacy Act 1988
- Australian Skills Qualifications Authority
- National Vocational Education and Training Regulator Act 2011
- Total VET Activity Data (AVETMISS)
- National VET Data Policy
- Data Provision Requirements 2012
- Australian Quality Training Framework (AQTF)
- Student Identifiers Act 2014
- Student Identifiers Regulations
- Freedom of Information Act 1982

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 to clients. 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 and procedure supports the standards for Registered Training Organisations (RTO's) 2015

Authorisation:

This procedure shall be endorsed and issued under the authority of the Deputy Chief Executive Officer.

Retention of Records Management Policy & Procedure

Policy:

For the purposes of this policy, records include:

- **Student results:** Training 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 national recognition for current competency held. 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 trainers and/or 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/or assessor. ASQA refer to these records as "*Completed student assessment items*"[1].

- **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 observations
- in-class practical assessment
- workshop tasks

- nominal hours record
- project
- language, literacy and numeracy assessment
- markers guide

- **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
- privacy forms
- invoices and receipts
- refund request
- training plans
- enrolment checklists
- terms and conditions of enrolment
- 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 in hard copy. This will usually be a standard office file as per the assigned class in which the student is enrolled and will be archived at the end of the student's enrolment.

- **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
- satisfactions survey's

Storage of Records:

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

- Records must be kept securely to prevent them being accessed by any non-authorised personnel
- Records must be kept confidential to safeguard information and to protect the privacy of students, employers and CPLE staff
- Records must be kept to avoid damage by fire, flood, termites or any other pests
- Student results and Qualification / Statements of Attainments must be backed-up in an electronic format and must be available to be retrieved at any time for a period of (30) years.
- Electronic data storage must 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 off-site using Nutanix infrastructure which is managed by Communities@Work ICT contractor, Qirx. There is 2 copies of data, 2 are backed up on two different local devices and 1 copy is located off-site and backed up.
- Paper Records (Student Training File) are to be stored in a secure/lockable cabinet within the Administration area for a period of up to12 months after completion of training and assessment. From there all paper records will be sent off-site to the archiving company, TIMG, for storage before destruction of files occurs. All paper records are al required to be scanned and saved in the students electronic file.

Period of Retention:

The Centre of Professional Learning and Education 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%) are to be retained for a minimum of thirty (30) years.
- **Completed assessment resources:** Completed assessment resources (100%) are to be retained for a minimum of seven (7) years from the date on which the judgement of competence for the student was made.
- **Assessment tools:** Assessment tools (100%) are to be retained for a minimum of seven (7) years.
- **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:

Centre of Professional Learning and Education (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 ceased to 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 course 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 are to 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 must be in a nationally AVETMISS compliant format produced using our RTO's AVETMISS approved, VETtrak student management system (SMS).

Destruction of Records:

Communities@Work's Manager of Quality Assurance, is the only person who can authorise (in writing) the destruction of records. Records are only to be authorised for destruction after the retention period has lapsed.

Documents identified for destruction are to be shredded before being recycled. The archives register must be updated in the notes section to identify that a particular record has been destroyed.

Responsibilities

To ensure records are maintained in a safe and suitable condition, the following responsibilities apply;

- The **Chief Executive Officer** is to ensure that CPLE implements suitable arrangements to comply with the requirements of this policy and procedure and the legislative requirements and regulations of the Standards for Registered Training Organisations. This is to include the acquisition and installation of records and data storage facilities and the application of records retention procedures.

- **Administrative and ICT support staff:** are to ensure that the initial records of a student enrolment are upheld and procedures for the archiving and storage of records are applied. Administrative support staff are to monitor the sufficiency of records storage and handling procedures and propose opportunities for improvement in accordance with the continuous improvement policy as required. Administrative support staff are also to liaise with Trainers and/or Assessors to ensure that approaches to records handling are consistent throughout CPLE's operation. ICT Support staff (QIRX) are to monitor and follow organisational procedure for the backing up of electronic data.

- **Trainers and Assessors:** are to ensure that student records are appropriately gathered during and at the completion or withdrawal of a training program and are suitably bundled and packaged in accordance with records archiving procedures, including;

    - Liaising with administrative support staff to ensure that their practices are aiding the efficient retention of student records.
    - Ensure student records are fully completed with sufficient information recorded by trainers and/or assessors to allow an independent review of the assessment decision by a third party.
    - Record, in detail, the interpretation of assessment evidence with suitably detailed comments to support their assessment decision and outcome.
    - Monitor the sufficiency of records storage and handling procedures and propose opportunities for improvement in accordance with the continuous improvement policy as required.
    - Use authorised CPLE resources only to record student progress and the outcomes of assessment activities.

Student Records Integrity:

During the handling of records relating to a student's enrolment and training and assessment outcomes, there is potential within a busy office that records may be misplaced, not entered correctly or mishandled. To minimise the potential for inaccurate record keeping, this policy includes specific guidelines for both administrative and training staff on the handling of records during the critical end stages of training. These include procedures and processed guidelines on the validation and entering of student results into VETtrak our student management system (SMS). These procedures must be strictly applied by all staff when handling student records.

Combined with this, CPLE will also undertake periodic integrity audits of student records to ensure the information collected and entered into VETtrak (SMS) is accurate. To achieve this, the RTO Manager will undertake periodic desktop audits of student records. The RTO Manager will aim to undertake a desktop audit of at least 10% of student records each quarter. The desktop audit will be conducted by making a direct comparison with the student's record (enrolment record, training

and assessment results) with the data that has been entered into the student's enrolment record within VETtrak (SMS). Specifically the desktop audit will seek to identify inaccuracies within the student's enrolment information and the details relating to the achievement of units of competency and training that has been engaged. The desktop audit will be quality controlled and recorded using a *Student File Record Audit Checklist*. Completed checklist will be electronically scanned and appended to the relevant student file. Inaccuracies identified will be corrected and form the basis of opportunities for improvement to improve data integrity of student records.

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).

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". 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 **must be kept secure**. This includes the information stored within VETtrak (SMS). User profiles and password protections for VETtrak are to be used by staff in order to prevent any unauthorised access to USI information. Where CPLE assisted the student to create their USI, additional details of this process and authorisation are collected on the students signed enrolment form.

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 staff when archiving student records on completion:
Trainers and/or Assessors:

- Retain all records which record information about the evidence collected during training and assessment. Note that 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 also be retained and is to be gathered on a suitable electronic storage media such as a CD, disk, or flash-drive for archiving. Recording of this information must be followed in accordance with *CPLE's file structure policy* for electronic files.

- Liase with administration staff to complete and update the student training plan.

- At the completion of each training module, all student assessment items and outcomes are to be sorted and placed into the students file under the relevant training module as per CPLE's file structure.

- Record all completed units of competency in the student management system VETtrak (SMS).

- Conduct a file check of the student record 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.

- The Trainer and/or Assessor is to provide the student with constructive feedback relevant to the module completion and the student's outcome with as much detail as possible.

- The Trainer and/or Assessor is to inform CPLE Administrative staff of the student's qualification completion and/or withdrawal. CPLE administrative staff will then follow the *Issuance of Certification process.*

Important to Note: Trainers 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 Trainers and/or Assessors for further detail and completion. Trainers and/or 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, the administrative staff are to;

- As enrolment records are received by Administration 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 and relevant documents are to be scanned and appended to the relevant electronic file as per CPLE file structure. This includes enrolment records and any documents from the State Training Authority (STA) during the enrolment period of the student.

- When student enrolment is confirmed Administration staff, are to send an email directly to the student and if necessary the employer from VETtrak (SMS). The email will include a confirmation letter, invoice, training plan, enrolment check list and terms and conditions of enrolment.

- Liase with Trainers and/or Assessors to complete the student training plan.

- Record any withdrawn and withdrawn not-started units of competency and record number estimated of hours engaged as per AVETMISS requirements in VETtrak (SMS).

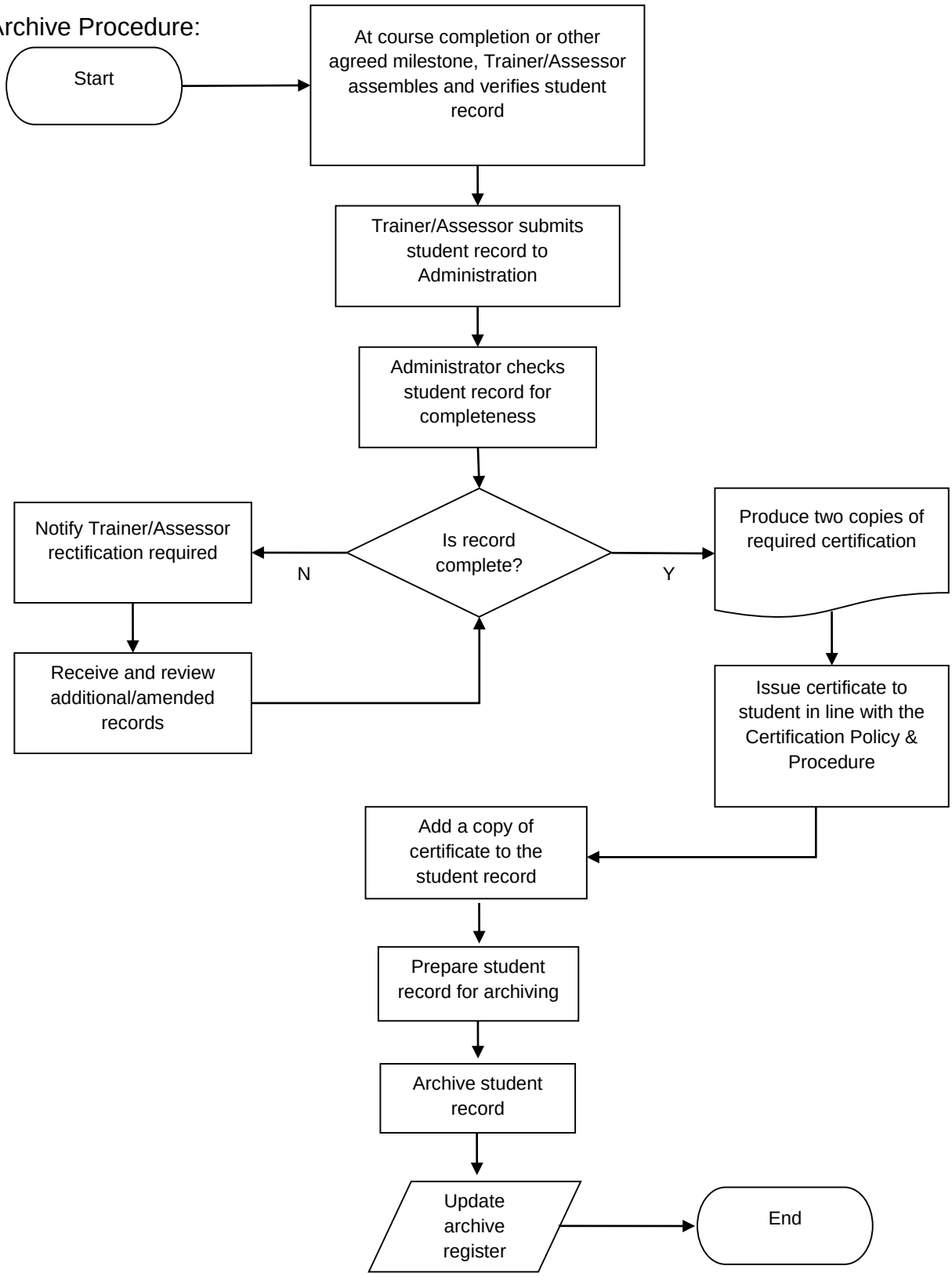
- When the student has completed all required units of competency, and notification has been received from the Trainers and/or Assessors, update the student's enrolment status in VETtrak (SMS) to record the completion or withdrawal of the student's training and enrolment. Create the appropriate Certificate or Statement of Attainment (SOA) in VETtrak as per *Issuance of Certification process.* Produce two copies, one copy for the student file and one 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 and all file checks are complete from Trainer and/or Assessors, Administration staff can proceed with archiving records. Move the students electronic file to Archived records under the year of completion or withdrawal. Create a new entry on the archives register when file is then taken off-site for paper records.

- **Important to Note:** Administrative staff are to ensure that Trainers and/or 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 Trainers and/or 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.

Retention of Records Management Policy & Procedure

CPLE Archive Procedure:



Retention of Records Management Policy & Procedure

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 organization throughout the records life-cycle, which includes from the time such records are conceived through to their eventual disposal.
ICT	Information Communications Technology
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.
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.
State Training Authority	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.
Record Retention	The retention period of a document represents the period of time a document should be kept or retained both electronically and in paper format. At the conclusion of the retention period, the document is usually destroyed.

Responsibilities:

Communities@Work [organisation]:

• Communities@Work shall provide the necessary resources to establish, develop, maintain and continuously improve its records management documentation and practices.

RTO Manager:

• Ensure this policy is read, understood and adhered to by all staff members that fall under their responsibility.

• Support the organisation's records management policy by incorporating the documented requirements and objectives into programs/services that fall under their responsibility.

• Request the review of this policy in the event the legislative requirements around records management change in their area of responsibility.

Manager, Quality Assurance

• Develop, implement and maintain a records Management System that sufficiently establishes control over Communities@Work operations based on the requirements of ISO 9001:2008, governing legislations/regulations and industry best practice.

Employee:

- Adhere to policy and procedure accordingly in line with compliance for the registered training organisation.
- Inform RTO Manager of any relevant changes or suggestions for continuous improvement

Retention of Records Management Policy & Procedure

Attachments & Forms:

1. CHC30113 Student File Record Audit Checklist
2. CHC50113 Student File Record Audit Checklist
3. CPLE File Structure

Related Documents:

ORG-QMS-POL-006	Document Control Policy
ORG-QMS-POL-009	Records Management Policy
ORG-QMS-POL-023	Continuous Improvement Policy
ORG-QMS-POL-002	Privacy and Confidentiality Policy
ORG-QMS-POL-029	Governing Legislation List
ORG-QMS-PRO-076	Organisational Archiving Procedure
RTO-QMS-PRO-002	RTO Reporting Obligations

References:

1. ISO 9001:2008 Clause 4.2.4 Control of Records
2. Australian Privacy Principles
3. Privacy Act 1988
4. Australian Skills Qualifications Authority
5. National Vocational Education and Training Regulator Act 2011
6. Total VET Activity Data (AVETMISS)
7. National VET Data Policy
8. Data Provision Requirements 2012
9. Australian Quality Training Framework (AQTF)
10. Student Identifiers Act 2014
11. Student Identifiers Regulations
12. Freedom of Information Act 1982

Communities@Work

Retention of Records Management Policy & Procedure

Document Contact:

Manager, Quality Assurance
P: (02) 6293 6500
E: quality@commsatwork.org

Review Specifications:

OFFICE USE ONLY			
Written/reviewed by:	Renee Chick	**Authorised for release by:**	Carla Scalia
Version number:	1	**Signature of authorising person:**	

VERSION HISTORY		
Version	**Date of effect**	**Brief summary of change**
1	11.07.2018	Development of initial policy
1.1	25.07.2018	Amendments to Period of Retention