

## Record Management Policy & Procedure

### Purpose

The purpose of this policy is to establish the framework for effective records management at CEAV Institute. This policy provides advice to CEAV Institute on the management and storage of information.

A good record-keeping program is fundamental to CEAV Institute's administrative transparency and accountability. It enables CEAV Institute to account for decisions and actions by providing essential evidence in the form of records and ensures the preservation of the collective memory of CEAV Institute.

CEAV Institute is committed to all aspects of its record-keeping independent of the technological medium. This policy seeks to ensure that CEAV Institute's business is adequately documented through the creation of records that are then managed by best practices.

### Scope

This policy applies to all areas of CEAV Institute.

Staff should be aware that electronic documents have the same status as paper documents. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Therefore, electronic records must be managed as part of a comprehensive record-keeping program.

### Responsibility

The ACCE CEO is responsible for the implementation of this Policy and to ensure that all staff are aware of its applications and implements its requirements.

Every member of staff is responsible for making and keeping records as necessary to record the functions, activities, transactions, operations, policies, decisions, procedures, affairs, administration, and management of CEAV Institute fully and accurately.

Staff members are to follow authorised procedures in carrying out record management functions and must observe security, privacy, and confidentiality requirements at all times by CEAV Institute's ***Privacy and Confidentiality Policy and Procedure***.

Staff are to handle records sensibly and with care and respect to avoid damage to the records and prolong their life span.

### Definitions or Reference Documents

- **Student** – A person being trained and assessed by CEAV Institute
- **Standards for Registered Training Organisations 2015 (RTOs)** – a set of standards endorsed by the Council of Australian Governments (COAG) Industry and Skills Council to provide
  - national consistency in the regulation of the VET sector using a standards-based quality framework and a risk-based approach
  - to promote quality flexibility and innovation in VET
  - promote Australia's reputation for VET locally and overseas

## Record Management Policy & Procedure

- promote a VET system that meets Australia’s social and economic needs
- protect students undertaking or proposing to undertake VET in Australia
- ensure access to accurate information regarding the quality of VET
- **VET** – Vocational Education and Training
- **ASQA** – Australian Skills Quality Authority
- **Archive** – the whole body of records of the continuing value of an organisation or individual.
- **Disposal** – a range of processes associated with implementing appraisal decisions. These include the retention, deletion, or destruction of records in or from record-keeping systems. They may also include the migration or transmission of records between record-keeping systems, and the transfer of custody or ownership of records
- **Electronic records** – records communicated and maintained using electronic equipment
- **Evidence** – information that tends to prove a fact. Not limited to the legal sense of the term
- **Information systems** – organised collections of hardware, software, supplies, policies, procedures, and people, which store, process and provide access to information
- **Record keeping** – making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information
- **Record keeping systems** – information systems which capture, maintain, and provide access to records over time
- **Records** – records information in any form including data in computer systems, created, or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity
- **Record means** a written, printed, or electronic document providing evidence that activities have been performed.

### Policy

CEAV Institute is committed to ensuring the integrity, accuracy, and currency of all Registered Training Organisation (RTO) records at all times.

All records are collected, maintained, and safeguarded in a secure and confidential environment and are archived systematically and consistently in a secure and timely manner.

CEAV Institute will retain (and not dispose of) any records until **three years** after the Skills First student to whom the records relate has completed or withdrawn from the relevant program they are enrolled in. Please refer to the Procedure on page 4 for details on specific items that are required to be retained.

For students who were enrolled in the 2021 VET Funding Contract or before, please refer to the CEAV Institute Archiving plan.

Certificates or Statements of Attainment Records are securely stored for 30 years as prescribed by the VET Quality Framework (VQF) and other statutory, regulatory and compliance obligations.

CEAV Institute will, to the best of their ability safeguard the confidentiality of personal information in line with its responsibilities and obligations under the Privacy Act, 1988 (Commonwealth) while ensuring that students will always have timely access to current and accurate records of their participation in training and assessment services.

## Record Management Policy & Procedure

The RTO must keep and maintain training records as required by the regulatory body ASQA and SVTS for Skills First Funding Agreements and these must be made available to the Regulator on request.

The RTO's training records, including notification forms, a record of training forms, and applicant details, must be kept in a secure location to prevent loss or damage through theft, fire, or flooding or to prevent access that would enable alteration or use by other persons.

In the event RTO training records are lost, stolen, destroyed or damaged, the RTO must advise the Regulator in writing as soon as possible with details on what happened and what specific records were affected.

Refer to CEAV Institute's Archiving Calendar

### Procedure

#### CREATION OF RECORDS

CEAV Institute staff are required to create full and accurate records which adequately document the business activities for which they are responsible.

Records should be full and accurate to the extent necessary to:

- Facilitate action by employees at any level and by their successors.
- Make possible proper scrutiny of the conduct of business by anyone authorised to undertake such scrutiny.
- Protect the financial, legal, and other rights of the organisation, its students and any other people affected by its actions and decisions.

#### CONTROL OF RECORDS

##### Version control

Documents will be monitored via version control and an overview of version control will be recorded in the Continuous Improvement Register. Earlier versions of documents will be kept in archive folders for the previous 3 years. Draft documents will be deleted once the final version has been approved and listed on the Continuous Improvement Register. This applies to both paper and electronic drafts.

##### Security

Records must be made accessible to authorised users.

Personal information about staff and students of CEAV Institute must be secured.

##### Storage

CEAV Institute's training records, including notification forms, a record of training forms, and applicant details, must be kept in a secure location to prevent loss or damage through theft, fire, or flooding or to prevent access that would enable alteration or use by other persons.

Records should be stored in conditions that are clean and secure with low risk of fire, water, dampness, mould, insects, and rodents. They should be kept away from direct sunlight and other sources of light and heat. The storage area should be well-ventilated and ideally maintained at a stable temperature and humidity.

## Record Management Policy & Procedure

In the event of CEAV Institute's training records are lost, stolen, destroyed or damaged, the RTO Manager must advise the Regulator in writing as soon as possible with details on what happened and what specific records were affected.

### Retention of Records

CEAV Institute must keep and maintain training records as required by ASQA and the Skills First Agreement and these must be made available to the Regulators on request.

CEAV Institute will retain (and not dispose of) any records until **three years** after the Skills First student to whom the records relate has completed or withdrawn from the relevant program they are enrolled in. The following items must be retained on a student's record:

- Evidence of Pre-Training Review (including literacy and numeracy assessment)
- Evidence of Eligibility
- Evidence of Concession/Fee Waiver
- Evidence of Enrolment
- Statement of Fees
- Invoices/Payments/Refunds/Statements
- Training Plan
- Communications with students that may impact the outcome of assessments of the student participation in training or assessment
- Evidence of Participation, inc. assessment booklets, evidence of national recognition or RPL/RCC
- All other records required under 'The Standards for Registered Training Organisations are available at [www.asqa.gov.au/standards](http://www.asqa.gov.au/standards)

For students who were enrolled in the 2021 VET Funding Contract or before, please refer to the CEAV Institute Archiving Calendar.

### Other records required to be retained for 3 years:

- Student, Trainer/assessor, stakeholder feedback and analysis of feedback
- AVETMISS statistical information records (where appropriate)
- Qualifications Register
- Risk Management register
- Continuous Improvement Register
- OHS incident and hazard forms
- Staff personnel records
- Trainer/Assessors records (resumes, qualifications, professional development logs, skills matrix)

### Disposal and Destructions of Records

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both paper and electronic records.

The following categories of records may be destroyed as normal administrative practice:

- Superseded manuals or instructions
- Catalogues and trade journals

## Record Management Policy & Procedure

- Copies of press cuttings, press statements or publicity material
- Letters of appreciation or sympathy or anonymous letters
- Requests for copies of maps, plans, charts, advertising material or other stock information
- Address lists and change of address notices
- Calendars, office diaries and appointment books
- Facsimiles where a photocopy has been made
- Telephone messages.
- Drafts of reports, correspondence, speeches, notes, spreadsheets etc.
- Routine statistical and progress reports compiled and duplicated in other reports

### Confidential Records should be destroyed as follows:

#### Destruction of paper records

Paper records must be placed in security bins. They must never be placed in unsecured bins or rubbish tips.

#### Destruction of optical media

Records held on optical media such as rewritable disks or USBs must be destroyed by cutting, crushing or other physical means.

#### Audit and Review

All record systems may be subject to audit and review to ensure compliance with legislative requirements and with the requirements of this policy.

#### Access to Records – Skills First

In addition to its obligations under Clause 11 (Audit, Review, and Investigation), upon request by the Department, CEAV Institute must promptly provide the Department with copies of, or make available for inspection during Business Hours at a location in Victoria specified by the Department:

- any Records relevant to the Funds or the Training Services, including those relevant to determining the quality of the Training Services, or those required by Clause 7.1.
- Records reasonably required to allow the Department to satisfy itself as to the financial position of CEAV Institute, the use of the Funds and the capacity of CEAV Institute to deliver the Training Services.
- assisting the Department to locate, access and view Records, including all Records that CEAV Institute is required to keep or provide under this Contract, including associated metadata; and
- permitting the Department to take copies of any records.

#### Student Records

The following records are filed in the student's file:

- Enrolment form
- Pre-Training Review Career Conversation Form
- LLN Assessment, via an Advanced Profile Report
- Training Plan

## Record Management Policy & Procedure

- Supporting evidence for any Credit Transfer granted such as copies of verified and authentic Testamurs/Statement of Attainment
- RPL application with supporting evidence
- Skills First Eligibility Declaration Form
- Student Fees Form
- Identification Documents to support enrolment application
- Copy of documentation relating to refunds of training fees
- Industry experience details (if applicable)
- Written and practical assessments
- Withdrawal or Deferral information
- Complaints and appeals
- Copy of qualification issues
- Correspondence such as emails, letters, medical certificates, warning letters
- File audit form (student file checklist)
- Active student files are to be kept in a secure location, which is held on the CEAV Institute electronic drive, which is backed up on the cloud on a daily basis.
- Inactive files are kept in a secure storage facility at TIMG (pre-2020 student files and training records are in archive boxes at a secure ACCE storeroom. Post 2020 the student files are all held electronically).
- Electronic records such as the certificate register, and student results are held on the student management system (VETtrak) for all students post August 2016.

### Privacy and security of student information

- Access to students' files is restricted to those staff who interact with students.
- Staff are not to distribute any information about any student to others unless with written approval from the student concerned.
- All student files are confidential and for use within the organisation only – no student file must leave the premises, unless it is being sent to the archive storage facility.
- Certain circumstances such as audits may require the disclosure of student information. These circumstances will be preceded by written notification from the relevant authority.
- Student attendance sheets are to be returned by the trainer/assessors and filed in the course folder for that intake.

### Stakeholder Feedback

Collected stakeholder feedback and its analysis (student and employer) are held electronically on Survey Monkey. These results can only be accessed by the RTO Manager – Head of Teaching & Learning, the RTO Administration Executive and the RTO Administration Officer.

### Complaints and Appeals

Complaints and appeals forms are:

- Entered into the electronic Complaints Register (which is saved in an electronic confidential location)
- filed in the complaints and appeals file and
- copy placed on the student's files
- The electronic Complaints Register is backed up daily via the cloud.

## Record Management Policy & Procedure

### Continuous Improvement

Continuous improvement forms are:

- Entered into the electronic continuous improvement register, and
- are filed in the continuous improvement folder
- The electronic continuous improvement register is backed up daily by the Data Collection & Reporting Policy and Procedure

Refer to CEAV Institute's *Continuous Improvement Policy and Procedure*

### Student Management System (VETtrak)

- VETtrak will collect student and employer information and archive it electronically. Back-up records will be created from that software for all plans, assessment results, qualifications issued and other student information
- VETtrak will be backed up nightly by VETtrak.

Refer to CEAV Institute's *Data Collection & Reporting Policy and Procedure*

### Student Access to Records

- Students may seek access to their files at any time. Students must complete a 'Request to Access Personal Information form' and submit it to the RTO Manager, Head of Teaching & Learning, who will action their request and locate their file.
- Students will be advised in writing by the RTO Manager, Head of Teaching & Learning when they can access their file.
- Students will be provided with a private area where they can look at their files. The student is to return their file to the RTO Manager, Head of Teaching & Learning when they have finished.
- The student's file is to be returned to its secure location.

### Change to Personal Details

Students are required to advise CEAV institute if:

- They have changed their name or propose to change their name.
- Wish to change the way their name appears on their qualification for cultural reasons.
- They have changed their mailing address.
- Students are to advise CEAV institute of any change of personal details on the Change of Contact Details form which is available on CEAV institute's [website](#) or request a hard copy form from the RTO Administration Team within seven days.
- Students are to attach appropriate supporting documents with their request to change their name such as:
  - A valid passport
  - A certificate issued by an Australian Registrar of Births, Deaths, and Marriages
  - An Australian Citizenship Certificate
- Once the form has been received by CEAV institute, the Student Management System will be updated by the RTO Administration Officer to reflect the changes to personal details.

### Staff Records

- CEAV Institute Staff records such as position descriptions, resumes, performance appraisals etc., are kept in a secure file which can only be accessed by the CEO, HR Members, RTO Manager, Head of Teaching & Learning and the RTO Administration Executive.



## Record Management Policy & Procedure

- CEAV Institute Staff are responsible for keeping their records up to date and must advise the RTO Manager, Head of Teaching and Learning, of any changes to details.

### Trainer/Assessor Details

- Trainer documentation such as resumes, qualifications, professional development logs, and skills matrixes are to be kept in a secure file which can only be accessed by the CEO, HR Members, RTO Manager, Head of Teaching & Learning and the RTO Administration Executive.
- Trainers/Assessors are responsible for advising the RTO Manager, Head of Teaching & Learning of any changes to their details.
- The RTO Administration Executive is responsible for updating trainer records in on the Trainer & Assessor Records Continuous Improvement Register.

## Meeting the requirements of the VET Quality Framework

- Standards for Registered Training Organisations:  
Standard 3 – Clause 3.4, 3.5  
Standard 6 - Clause 6.5
- Skills First:  
Clause 4 – 4.4, 4.5  
Clause 10 – Clauses 10.1 – 10.13  
Clause 11 – clause 11.2 iii) iv)
- Skills First Quality Charter:  
Principle 2 b)

## Related Documents

- Privacy & Confidentiality Policy & Procedure
- Issuance of qualifications Policy and Procedure
- Enrolment Policy and Procedure
- Fees, Charges and Refunds Policy and Procedure
- Credit Transfer Policy and Procedure
- Recognition of Prior Learning Policy and Procedure
- Training Plan Policy and Procedure
- Request to Access Personal Information Form
- Moderation Policy and Procedure
- Validation Policy and Procedure
- Student Management System - VETtrak
- Trainers and Assessors
- Change of Contact Details form



## Record Management Policy & Procedure

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Legislation	Relevant Websites
<b>Commonwealth:</b>	
National Vocational Education and Training Regulator Act 2011, including the July 2020 amendments	<a href="#">Federal Register of Legislation - National Vocational Education and Training Regulator Act 2011</a>
Australian Privacy Principles	<a href="https://www.oaic.gov.au/privacy/australian-privacy-principles">https://www.oaic.gov.au/privacy/australian-privacy-principles</a>
Commonwealth Privacy Act 1988 and Amendments	<a href="#">Federal Register of Legislation - Privacy Act 1988</a>
Public Records	<a href="https://www.legislation.vic.gov.au/in-force/acts/public-records-act-1973/041">https://www.legislation.vic.gov.au/in-force/acts/public-records-act-1973/041</a>
<b>Victorian:</b>	
Education and Training Reform Act 2006	<a href="https://www.legislation.vic.gov.au/in-force/acts/education-and-training-reform-act-2006/091">https://www.legislation.vic.gov.au/in-force/acts/education-and-training-reform-act-2006/091</a>
Victorian Privacy Act 2008	<a href="https://www.vic.gov.au/privacy-vicgovau">https://www.vic.gov.au/privacy-vicgovau</a>
Privacy and Data Protection Act 2014	<a href="https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/027">https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/027</a>

## Record Management Policy & Procedure

### Appendix A: Retention of Records Table:

Item	Description	Period of Retention
Student results	Records may be electronic or hard copy and should show, for each unit of competency the result (usually a notation of competent/not yet competent), and the date of result.	Keep for <b>3 years</b>
Qualifications/Statements of Attainment issued	A record of qualifications/statements of attainment issued to each Student must be retained. This may be either electronic or hard copy and must contain enough information to reproduce the qualification/statement of attainment if required. A record of units of competency achieved by each Student must also be retained.	Keep for <b>30 years</b>
Assessment instruments/tool/procedures and assessor's marking guides/criteria/observation checklist	A master copy of each version of all assessment tools. This includes criteria by which an assessor would base assessment decisions such as model answers, which list the key points and/or other benchmark criteria. The assessment instruments will be reviewed by the audit team, including industry advisers where appropriate. If a model is used as part of an assessment, then either the model or a detailed description of its critical components should be retained.	Keep a master copy of all versions of the assessment Instruments/ tools/ procedures used for <b>3 years</b> following the last date of use.  Master copies may be retained electronically or in hard copy. However, sufficient information must be retained to confirm which version of each assessment tool was used on a given date

## Record Management Policy & Procedure

<p>Completed assessment items (This refers to the student's completed work and includes evidence collected for RPL purposes)</p> <p>*The appeal period is 21 days. Students must be informed of the appeal period ** A cohort is any grouping of similar Students undertaking the same training program (e.g., classroom block) or the same delivery methodology (e.g., on the job, flexible, online). Where a cohort is determined by methodology, it should comprise Students enrolled within 12 months</p>	<p>Completed assessment items to demonstrate compliance with the Standards for Registered Training Organisations (RTOs) 2015 must be retained for at least six months from the date on which the judgement of competence for the student was made.</p> <p>During the appeal period* The RTO will need to keep sufficient evidence of how the assessment was made to justify the decision if there is an appeal. This includes evidence collected for RPL purposes. If possible, the completed assessment items must be retained until the expiry of the RTOs appeal period. If it is impossible to keep all completed assessment items, the assessor's observation checklists or similar documents must be retained, along with evidence (e.g., photographic or video evidence) of the completed work After the appeal period* The RTO will need to keep sufficient evidence of how the assessment was made to justify the decision. This includes evidence collected for RPL purposes. If possible, the completed assessment items must be retained. If it is impossible to keep all completed assessment items, the assessor's observation checklists or similar</p>	<p>During the appeal period* 100% of records must be retained until the expiration of the RTOs appeal period.</p> <p>After the appeal period* For each unit of competency delivered by the RTO, keep all Student assessment evidence for each selected Student from each cohort** for a minimum of 12 months after confirmation of the final result (i.e., expiry of the appeal period) for a sample of Students as follows:</p> <ul style="list-style-type: none"> <li>• Every Student – when the cohort comprises 1 to 10 Students</li> <li>• 10% or 10 (whichever is greater) when the cohort comprises over 10 Students</li> </ul> <p>The sample of Student records retained should be representative of the standard of the RTOs records for that cohort.</p> <p>*Note – Additional retention periods and conditions may be imposed by contractual or regulatory requirements.</p>
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## Record Management Policy & Procedure

	<p>documents must be retained, along with evidence (e.g., photographic or video evidence) of the completed work.</p> <p>The retained evidence must have enough detail to demonstrate the assessor's judgement of the student's performance against the standard required. Clear benchmark criteria against which the student's performance was measured must be included in the evidence. The assessment tool must include a summary of the feedback given to the student, the name of the assessor and the date of the assessment. If no checklist is used, the complete assessment item itself must be retained.</p>	
Staff and Trainer Records	Records will be in both hard copy and electronic copy.	Keep for <b>3 years</b>