

Records Retention and Management Policy

1. Purpose

At ISH24 we recognise our obligation to retain certain records from our delivery of training and assessment services to clients. The maintenance of a well-structured records retention 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.

2. Legislation

Standards for Registered Training Organisations Clause 3.4

Records of learner AQF certification documentation are maintained by the RTO in accordance with the requirements of [Schedule 5](#) and are accessible to current and past learners.

For the purposes of this policy, records include:

- **Learner results.** Training results include a record of the learner's details, date of enrolment and results of training and assessment. This should include what units of competency (including codes) and the result the learner achieved. This may include if the learner withdrew, was assessed as competent or not-yet-competent, was recognised as competent through an RPL process or was issued credit transfer for current competency held. Learner results also include all relevant data elements relating to the *Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS)*.
- **Qualifications / Statements of Attainment.** Qualifications and Statements of Attainment are documents issued to recognise the award of nationally endorsed and accredited outcomes. Qualifications and Statements of Attainment are formatted and prepared in accordance with the Australian Qualification Framework.
- **Completed assessment resources.** Completed assessment resources include documents or other media where assessments evidence has been recorded by learners and assessment decisions are recorded by assessors. It may be a combination of templates, questionnaires, checklists, summary sheets, RPL tools, or records of feedback from assessors to learners. Assessment resources include all those items which substantiate the assessment decision made by an assessor. ASQA refer to these records as "*Completed learner assessment items*".
- **Assessment tools.** Assessment tools refer to the various templates, checklists and assessment records that ISH24 uses over the term of its operations. This specifically refers to the retention of the previous versions 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.
- **Administrative records.** Administrative records are those documents which are used to facilitate the learner's administration during their enrolment. Examples of administrative records are enrolment forms, privacy forms, requests for refund, etc.

- **Learner file.** The learner file is simply the file location where all learner results, completed assessment resources and administrative records are retained in hard copy. Administrative records and assessment outcomes are maintained within the student management system [aXcelerate](#). Physical completed assessment resources and paper enrolment forms are archived in accordance with ASQA SRTO 2015 requirements.
- **RTO management records.** RTO management records are those files which assist management and staff to coordinate RTO services. These may include policies and procedures, data registers, enrolment registers, attendance records, financial records and records of complaints and appeals.

3. Storage of Records Requirements

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-authorized personnel.
- Records must be kept confidential to safeguard information and to protect the privacy of learners and ISH24 staff.
- Records must be kept avoiding damage by fire, flood, termites or any other pests.
- Learner results and Qualification / Statements of Attainment must be backed up in an electronic format and must be available to be retrieved at any time.
- 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 and managed by our IT partners Neon Tech.

4. Period of Retention

ISH24 must comply with a range of record retention requirements including:

- ATO requirements relating to financial records
- ASQA General Direction: Retention requirements for completed learner assessment items [Click Here](#).

In determining our period of retention, ISH24 has selected retention periods beyond some requirements in order to simplify our approach and to ensure compliance with all requirements under the one approach. The following time periods are to apply to the retention of learner electronic records at ISH24:

- **Learner results / Qualifications / Statements of Attainment.** Learner results relating to the training products that have been issued (Qualifications and Statements of Attainment) are to be retained for a minimum of thirty (30) years. This is essentially the AVETMISS compliant data contained within the organisation's student management software aXcelerate.
- **Completed assessment resources.** Completed assessment resources (100%) are to be retained for a minimum of three (3) years from the date on which the judgement of competence for the learner was made.

- **Completed assessment resources – that relate to High Risk Work Outcomes.** Completed assessment resources (100%) are to be retained for a minimum of seven (7) years.
- **Assessment tools.** Assessment tools (100%) are to be retained for a minimum of five (5) years.
- **RTO management records.** RTO management records are to be retained for a minimum of five (5) years. This requirement relates to the versions of these records.
- **Administrative records.** Administrative records are to be retained for a minimum of five (5) years. This requirement relates to the versions of these records and completed records.

Note. Records may be retained in hard copy or electronically.

5. Destruction of Records

The ISH24 RTO/Education Manager is the only person who can authorise the destruction of physical copies of records. Records are only to be authorised for destruction after the retention period has lapsed and records have been backed up digitally where required in accordance with SRTO 2015. Documents identified for destruction are to be shredded before being recycled.

6. Record Handling Responsibilities

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

- The **ISH24 RTO/Education Manager** is to ensure that ISH24 implements suitable arrangement to comply with the requirements of this policy and the requirements 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.
- **Training Admin** are to ensure that procedures for the archiving and storage of records are applied including the backing up of electronic data. Training Admin 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. Training Admin are also to liaise with Trainers and Assessors to ensure that approaches to records handling are consistent throughout ISH24's operation.
- **Trainers / Assessors** are to ensure that learner records are appropriately gathered during and at the completion of a training program and are suitably bundled and packaged in accordance with records archiving procedures, including:
 - Liaising with Training Admin to ensure that their practices are aiding the efficient retention of learner records.
 - Ensure learner records are fully completed with sufficient information recorded by 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.

- 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 ISH24 records only to record learner progress and the outcomes of assessment activities

7. Archiving Procedure

The following procedure is to be followed by all relevant staff when archiving learner records:

Trainers

- Retain all records which record information about the evidence collected during assessment. Note that learners 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 depending on the file format is to be either printed or gathered on a suitable electronic storage media such as a flash-drive for archiving.
- **Important to Note:** Trainers are to ensure that their observations and comments recorded onto completed assessment resources are detailed and complete. It is an ASQA requirement that retained evidence of assessment must have enough detail to demonstrate the assessor's judgement of the learner's performance against the standard required. If assessment records are received by Training Admin for entry and archiving and they are deficient of detail, Training Admin are instructed to return the assessment documentation to Trainers for further detail and completion. Trainers who receive returned assessment documentation and who have issues with this arrangement are to refer their issue directly to the ISH24 RTO/Education Manager.
- At the completion of a training module, all learner records are to be sorted and placed into a ISH24 archiving envelope.
- The archiving envelope is **not** to be sealed and should either be handed personally to ISH24 Training Admin or mailed via registered express post to ISH24 Bendigo Office for archiving.

Training Admin

- Training Admin review the received assessment records by checking all required evidence is included and completed correctly and in full by the Learner and the Trainer/Assessor. The learner record is reviewed to ensure that all evidence and assessment records (including electronic files) correspond with the units of competency being issued to the learner.
- **Important to Note:** Training Admin are to ensure that retained evidence of assessment must have enough detail to demonstrate the assessor's judgement of the learner's performance against the standard required. If an assessment record is received by administration for entry and archiving and is deficient of detail, Training Admin are to return the assessment documentation to Trainers for further detail and completion. Trainers who contact admin and who have issues with this arrangement are to be referred directly to the ISH24 RTO/Education Manager.

- Assessment outcomes are recorded in the student management system aXcelerate. It is an important requirement to ensure that the date entered into aXcelerate that the outcome was achieved corresponds with the date recorded by the assessor that the assessment decision was made.
- When the learner has completed all required units of competency, Training Admin will update the learner's enrolment record within aXcelerate to record the completion of the learner's training and enrolment. This then presents the opportunity to create the appropriate Qualification or Statement of Attainment and present this for authorisation by the ISH24 RTO/Education Manager. Certificates are published direct from aXcelerate and include a unique certificate number and the learner's aXcelerate number (not the learner's USI).
- **Note.** Please refer to the Issuing Certificates and Outcomes Policy for a detailed outlined of the procedure to produce, authorise and issue AQF certificates.

RTO/ Education Manager

- Assessment records undergo another check by the RTO/ Education Manager for completeness and accuracy.
- Issued Certificates/ SOAs are reviewed for accuracy and issued digitally.
- Assessment resources are archived in secure location.
- Archive register is updated.

8. Learner Records Integrity

During the handling of records relating to a learner'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 learner results into the ISH24 learner management system (aXcelerate). These procedures must be strictly applied by all staff handling learner records.

Combined with this, ISH24 will also undertake periodic integrity audits of learner records to ensure the information entered into the learner information management system (aXcelerate) is accurate. To achieve this, the RTO/Education Manager will undertake periodic desk audits of learner records. The RTO/Education Manager will aim to undertake a desk audit of at least 10% of learner records each quarter. The desk audit will be conducted by making a direct comparison with the learner's record (enrolment record and assessment result) with the data entered into the learner's enrolment profile within aXcelerate. Specifically the desk audit will seek to identify inaccuracies in learner's enrolment information and the details relating to the achievement of units of competency. Identified inaccuracies will be corrected and form the basis of opportunities for improvement to improve data integrity.

9. Email Records and Correspondence

In many cases, information relating to training operations will be transmitted using electronic communication. It is important that this information is also retained and archived.

10. Unique Student Identifier

The Student Identifiers Act 2014 was approved and came into effect from the 1st January 2015. Any USI provided to ISH24 by a learner must be verified with the USI Registrar. This may be achieved by inserting the USI into the Learner details within aXcelerate and changing the USI status to “Verified”. Once verified the status will have changed to “Verified”. If the status does not change to Verified then one of the following learner details is 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 learner’s name. The learner 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 learner must align with the name they provided when they registered their USI.

Learner Identifier details and all related documentation under the control of ISH24 must be kept secure. This includes the information stored within aXcelerate. User profiles and password protections to aXcelerate are to be used in order to prevent any unauthorised access to USI information. Where ISH24 assisted the learner to create their USI, additional details such as the learners Driver’s Licence information will have been collected and stored within the aXcelerate - Document Verification System (DVS). Once the learner’s USI has been successfully created, these details within the DVS are automatically removed (deleted) from the database. This is a requirement of the USI legislation and is aimed at protecting the learner’s privacy.

Further information on the Unique Student Identifier can be accessed via the following website:

<http://usi.gov.au/Training-Organisations/Pages/training-organisations.aspx>

11. Treatment of Records on Ceasing Operation

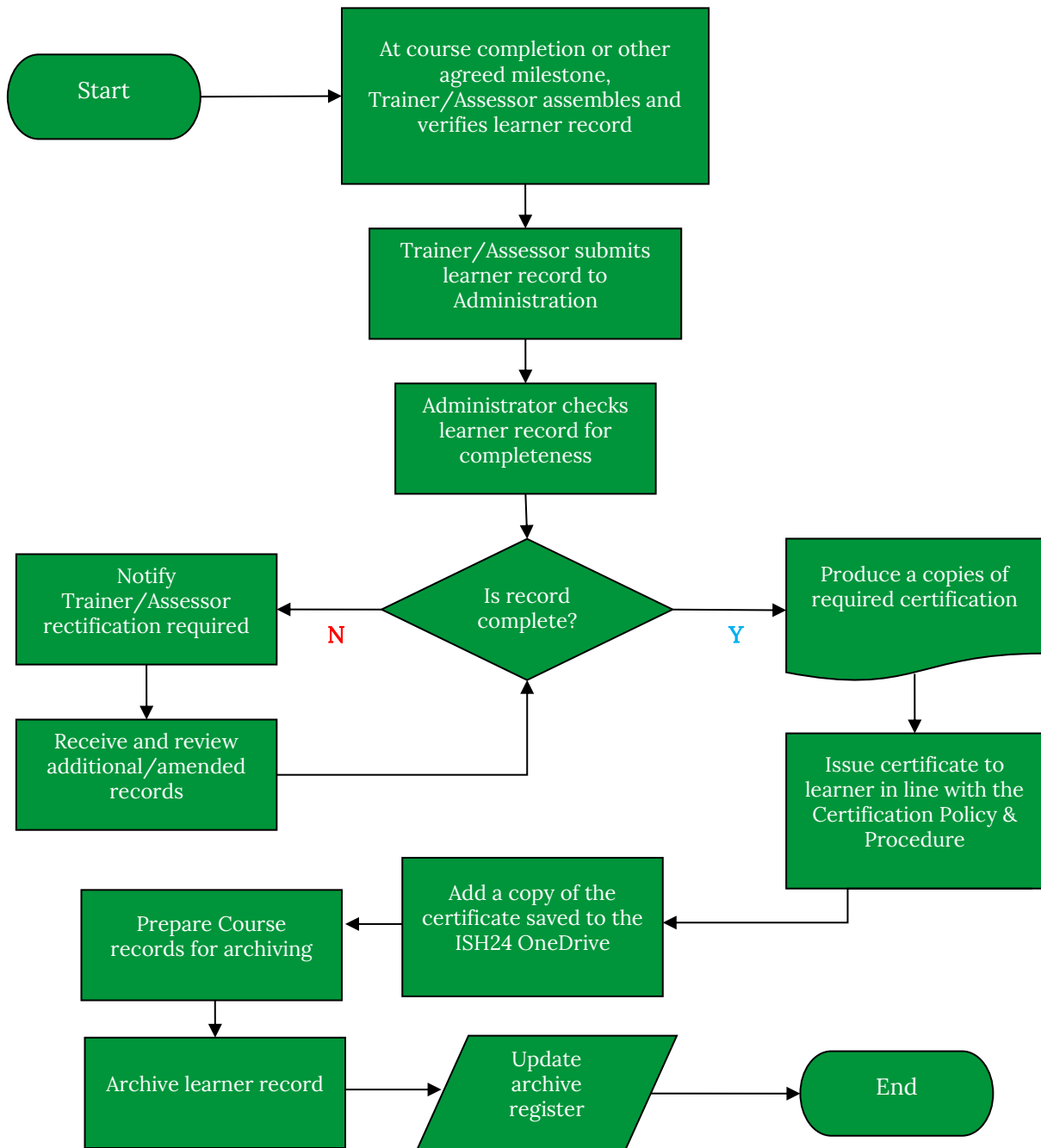
ISH24 acknowledges that it has a responsibility to retain accurate copies of records to enable these to be transferred to ASQA should ISH24 ceased to operate. It is a requirement that RTOs who ceased to operate, must, within 30 days of registration ending, forward to ASQA an electronic copy of the records for each learner who was enrolled in a course during the period of registration.

This requirement does not include hard copy learner files and relates specifically to electronic data providing evidence of activities the learner has performed. For the purposes of this policy, ISH24 will interpret “activities” to mean records providing information on the outcomes achieved by learners. This will include records of qualifications and units of competency which have been issued by ISH24 during the entirety of its registration period. ISH24 will retain these records electronically and will provide this information electronically. The following information must be included:

- Student’s full name
- Residential post code
- Date of birth
- Student ID number (if issued)
- Enrolment/commencement date(s)
- Code and title of qualifications
- Codes and title of units of competencies
- Results for each unit of competencies
- Date the certificate or statements of attainment were issued
- Unique Student Identifier (2015 onwards students only)

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 aXcelerate learner management system.

Records Archiving and Completion Process



VERSION CONTROL

| Date | Version | Changes Made | | Changed by |
|------------|---------|-----------------------|---|-------------------------------|
| | | Grammar and Spelling | Formatting | |
| 20/09/2022 | 2.0 | Check all and correct | Update to new style. Add version control page Review for content accuracy and minor procedural amendments | Su White Jana Gumovsky |