

Compliance Focus

ASQA Standards, Clause, 3.4

National Code 2018, Standards 6, 8, 11

Policy Scope

This policy applies to all students, staff, and employers.

Policy Overview

The Records Management policy is in place to ensure all student records are stored and managed in a secure and safe manner and kept for the required timeframe. This policy covers the general management of all student records, including personal and training related information.

Policy

It is the responsibility of all staff to ensure that all student records are secure with access limited to authorised personnel only.

The CEO or nominated delegate has the responsibility for the storage, maintenance and archiving of all student records in accordance with Standards for RTOs 2015 and relevant legislative requirements.

The archiving of student records is managed by the Head of Compliance - Data. All archive boxes are labelled with relevant details and saved against the student record.

The RTO is to retain all completed unit or module assessments for a minimum of 6 months from the date the student was marked as competent as per government funding body requirements. The RTO must retain a record of Certificates (Testamur), Record of Results and Statements of Attainment issued for a period of 30 years, except as required under the Standards for RTOs 2015, Government Contracts or by law. Information about a student will not be disclosed to a third party without their written consent. Access by a student to their personal records is available by written request. Students who hold a verified USI and whose results have been reported will be able to access their records via the USI Portal.

Student Record Retention

Student records will be kept for the following minimum periods of time:

- **Evidence of assessment decisions** are kept for a minimum of 6 months past the date of course completion or withdrawal unless the student is a government-funded student.
- **For government-funded students** all records relating to a student's enrolment in the course, confirmation of students' eligibility for subsidised training and confirmation of application fees for delivery of the course are kept for at least 5 years so that the records may be audited upon request.
- **For government-funded students** records relating to the Training Plan and Evidence of Participation including but not limited to assessment outcomes are kept for at least 3 years for Skills First Program after the eligible individual to whom the records related has completed or withdrawn for the relevant training course or qualification in which they are enrolled so that the records may be audited upon request. Clause 10.6 2022-23 Standard VET Funding Contract. For VET Student Loans records will be kept for 5 years as per the VET Student Loan Rules.

For VET Support Loan students all records of the following will be retained by VFA Learning for a period of 5 years:

- student's ACER and suitability Academic assessment are kept for 5 years so that the records may be audited upon request.
- The information provided to a student under section 98 before the student enrolled in an approved course.
- Records of the students enrolment, including the day and time the student enrolls in the course or part of the course;
- The information and documents collected for the purpose of, or in relation to, an application by a student for a VET student loan;
- If applicable, the day and time the student gives the provider an application for a VET student loan;
- all correspondence between the provider and the student (or the student's parent or guardian) in relation to the course, including notices issued to the student;
- records of each use of the provider's grievance procedure;
- the census days and tuition fees for approved courses;
- a copy of the versions of a process or procedure required under the Act and the dates when the version was current;
- marketing and promotional material relating to approved courses

Records of the issuance and attainment of AQF qualifications and units of competency will be kept for a minimum of 30 years in VETtrak to ensure that they can be re-issued as required.

- Student records are all stored and disposed of in line with the Australian Privacy Principles and Public Records Act.
- In the event that a funding-related contract is terminated or expires, VFA Learning will store the records relating to that contract, either electronically or in hard copy, in a secure manner to ensure that only authorised VFA Learning personnel have access to such records (e.g., locked filing cabinets, electronic passwords and administrative access controls).

Course Enrolments, Entry and Admission

Student records will be kept for the following procedures for the prescribed minimum periods of time:

- Applicants will participate in a Pre-Training Review process to ensure the course is suitable for the student, to determine if the student is eligible for Government Funding and to ensure VFA Learning is able to support the student appropriately in the course.
- Where the student is not deemed suitable for enrolment, the application will be denied, and the reasons will be provided to the student in writing.
- All government-funded students will undergo an eligibility assessment in line with state requirements to confirm their entitlement.
- All government-funded students are eligible for a concession if they hold a current Commonwealth Health Care Card, Pensioner Concession or Veterans Gold Card at the time of enrolment and provide a copy to our office. Concession rates cannot be applied to Materials Fees. Evidence of concession is held on file in the form of a written declaration. Any reference to the student's Centrelink CRN will be removed.
- Students will be sent a Welcome Letter/Confirmation of Enrolment Letter with details of the course they have been enrolled in, start and expected completion dates, trainer details, funding type (if applicable), all applicable fees including a Statement of Fees and study mode once the student's application has been processed and accepted by VFA Learning.

- All students will be required to sign an Enrolment Form to show acceptance of the Enrolment Terms and Conditions.

Apprentices/Trainees

Student records will be kept for the following procedures for the prescribed minimum periods of time:

- Apprentices/Trainees must be enrolled with VFA Learning and training plans signed within 3 months of the date of commencement of the Apprentice/Trainee's Training Contract and VFA Learning will ensure they assist employers meet this requirement.
- DELTA will be monitored regularly to identify if new individuals have nominated VFA Learning as their preferred provider.
- VFA Learning will immediately notify the relevant Australian Apprenticeship Support Network (AASN) if the qualification on DELTA is not appropriate or relevant to the apprentices/trainee's work duties and will request the employer to vary the contract.
- Apprentices/Trainees will have vocationally relevant individual training plans developed in consultation with the employer, RTO and apprentice/trainee to ensure it reflects the industry requirements and workplace setting.
- VFA Learning will notify the AASN within 2 weeks if the apprentice/trainee:
 - does not enrol with the RTO
 - withdraws from the course or does not commence training
 - changes the employer
- VFA Learning will update DELTA:
 - There are any situations, including absences, that may affect the trainee/apprentice's completion of the Training Contract
 - The trainee/apprentice completes their qualification, and it is issued – this will be notified via DELTA.
 - the trainee/apprentice changes their address
- The Manager of the AASN and funding department delegate will be notified within 24 hours by email if VFA Learning becomes aware of the death of an apprentice/trainee.
- Once all parties have signed the training plan, a copy will be provided to the student and workplace. As the training plan is a living document, all parties must continually update and maintain their copy of the training plan.

Completions

- Upon completion of a course, students will be issued with their certification documents in line with our *AQF Certification Policy and Procedure*. These will be issued within 30 days of completion if all fees have been paid.
- Records of completion and issuance are stored on each student's file and entered into VETtrak, VFA Learning's student management system, to ensure accurate AVETMISS reporting.
- For trainees and apprentices, DELTA will be updated with the completion information within two (2) weeks of completion.
- Where the student is government funded, the relevant departmental reporting system will also be updated according to the reporting timelines, and no later than each month.

Withdrawals

- Students who wish to withdraw from their course are required to fill in a *Withdrawal Request Form* and return it to a VFA Learning office, which may be via email.

- Where fees have been paid, VFA Learning will apply its *Withdrawals and Refund Policy and Procedure*.
- Withdrawals will prompt the issuance of a Statement of Attainment where applicable.

Electronic Signatures

- VFA Learning is required to keep documents signed by the Student where the action identifies the Student, including assessments. All VFA Learning Students access Cloud Assess, VFA Learning's Learner Management System (LMS). Students must have a valid and current email address, so that VFA Learning may send Cloud Assess links to Students.
- Students will be issued a personal User ID number (ID) to use for all on-line activities located in Cloud Assess. Together with the ID, the system will ask Students to generate a password, that acts as a digital signature to acknowledge that the work completed is authentic.
- A Student's ID and password are used in tandem by VFA Learning to confirm that the correct individual has undertaken the required study and of course, prepared and submitted the required assessments. This is important evidence for both the regulator and for Government funding purposes.
- It is important that Students keep their ID and password safe and confidential and do not share it with any other person, including family members and friends.
- For each instance that Students access Cloud Assess, they must use their assigned ID and password and must never use another Student's ID nor password. Students must never attempt to bypass the procedures authorised to them, nor access controls to perform other tasks. Students should be mindful to never enter any information into VFA Learning's LMS which they know to be false, including their personal details. In addition, it is important that Students log off from VFA Learning's LMS when they move away from their workstation/laptop, including at home. Students must also ensure that others are not able to view the data on their screen.
- On enrolment, Students will be asked to sign a *VFA Learning Management Systems User Security Declaration*, which includes on-line activities. When Students submit any assessment, they will be asked to self-declare that the work lodged was prepared by them: this is an important declaration and must be treated seriously. Should VFA Learning identify or on reasonable suspicion, believe that any Student is not adhering to these requirements, it will commence disciplinary proceedings.
- If Students lose or misplace their ID or forget their password, they must reset their ID/Password. If Students feel that their password isn't secure enough or that their account has been compromised, they should reset it using the 'Forgot Password' link on the log in page of the LMS.
- In accordance with our strict *Privacy Policy* VFA Learning issues Students with a system generated ID, holds your ID in a secure manner and it is only accessed by those that need to have access to it to support Students in their studies. These staff are VFA Learning's IT System Administrator, together with each campus' Academy Managers and their delegated local administrators, who hold restricted access only to IDs from their campus location, so that they may provide technical support to Students at all times.

Unique Student Identifier

- VFA Learning complies with the requirements of the Student Identifiers Act 2014 as required by Clause 3.6 of the Standards for RTOs 2015 (the standards). This means that VFA Learning collects a Unique Student Identifier (USI) from students upon enrolment and ensure USIs are verified prior to the issuance of any certification documents.

Student Access to Records

VFA Learning confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

VFA Learning Privacy Officer

03 5223 6800

privacy@vfalearning.vic.edu.au

Ensuring Accurate Information is Maintained

- Students are encouraged to review and update any incorrect personal information from the time of application and at the time of enrolment. A further reminder is provided within the Student Handbook.
- As part of VFA Learning's *Application and Enrolment Procedure* and as evidenced on the VFA Learning *Application and Enrolment Form*, VFA Learning ensures that it verifies all personal and related student information for the purposes of any application, regardless of the funding or loan support arrangement that may be of interest to a prospective student (refer to VFA Learning's *Application and Enrolment Policy and Procedure* for details of what is collected and verified).
- VFA Learning's Contracts and Compliance Manager will meet with the Head of Compliance – Data on a monthly basis to review student data to ensure the completeness and accuracy of the data to be submitted. Any discrepancies will be identified and rectified no later than the following month.

Provision of Student Information to the Regulator, Tuition Assurance Scheme Operator and Funding Bodies

- All records will be made available to ASQA, VFA Learning's Tuition Assurance Scheme Operator and all funding bodies and their delegates on request in a timely manner.
- All VFA Learning staff commit to full cooperation with ASQA, funding bodies and their delegates.
- Students are made aware of this requirement through the Student handbook as well as the publishing of this Policy and Procedure on VFA Learning's website.

VET Student Loan Program

- VFA Learning has ensured that it has met all its student information obligations as outlined in the VET Support Loan Program through this Policy and Procedure.

Skills First Program (Vic)

VFA Learning will ensure that it will retain, and make available to the Department, or its auditors or reviewers for audit, review or investigation purposes, all records relating to the Training Services, including:

- Evidence of Eligibility, Evidence of Concession/Waiver/Exemption, Statements of Fees and Evidence of Participation;
- Evidence of issuing a VIC Student Number to eligible students;
- in respect of each Pre-Training Review that is required to be conducted, the evidence of that Pre-Training Review as required under regulations;
- Evidence that the training and assessment provided was appropriate and of high quality as defined in the Quality Charter and meets the requirements set required; and
- Evidence that the Training Provider has received any and all fees from Eligible Individuals that the Training Provider reported via the SVTS as having charged, and copies of any invoices, or statements provided to the Eligible Individuals, and bank generated transaction statements of the Training Provider's accounts into which the fees were paid or received, such that the Department can confirm that the Training Provider received the fee for which each Eligible Individual was invoiced,

in respect of each Eligible Individual in relation to whom the Training Provider provides the Training Services.

- In accordance with the Victorian VET Student Statistical Collection Guidelines, VFA Learning will report eligibility and fee exemptions through the student management system under Training Activity (NAT File 00120)
- In the event that the VFA Skills First (Vic) contract is terminated or expires, VFA Learning will store the records relating to that contract, either electronically or in hard copy, in a secure manner to ensure that only authorised VFA Learning personnel have access to such records (e.g., locked filing cabinets, electronic passwords and administrative access controls).

Procedure

Step 1 - Process Commences

The Compliance Team organise and prepare all relevant student files to be archived safely and systematically.

Step 2 - Type of Archive

The archiving process will cover all paper-based and electronic student records.

Step 3 - Records received by the Compliance Team from the Trainer/Assessor

Prior to handing records to the Compliance team the trainer/assessor will ensure the following:

- Student successfully completed assessments
- Workplace Assessment Pack is completed
- Attendance Record

Step 4 – Compliance Team to scan and save all relevant documents

The following folders will be scanned and retained for a period up to 30 years (LMS):

- Competency Sheet (3 years from completion)
- Enrolment Form (3 years from completion)
- Copy of Certificate (Testamur) and Record of Results (30 years)
- Student Assessments (according to regulatory requirements) (3 years from completion)

Step 5 - Paper-based Archive Box

Compliance Team to place completed student files in an archive box and retain in a secure location for 6 months (or according to regulatory requirements) after the student has been deemed competent and completed.

Step 6 - Spot Checks

A least 10% of completed student material is checked by the Compliance Team to ensure accuracy between hard and electronic copies of the student files.

Step 7 - Destruction Approval

The destruction of student records cannot occur until formal approval has been given by the General Manager. This approval needs to be written and stored within the Archive/Destruction Register.

Step 8 - Destroy

Once the General Manager approval has been provided to the Compliance Manager, who will then organise a secure destruction of student files (electronic/paper based).

Step 9 - Ongoing

Steps 6-8 are carried as applicable (annual basis).

Step 10 - Process Ends

All files are recorded on the Archive Register.

Related Documents

- Privacy Policy and Procedure
- Assessment Policy and Procedure
- Issuing of AQF Credentials Policy and Procedure

Responsible Officer

The responsible officer for the implementation of this Policy is the General Manager.

Publishing details

Document Name	Student Record Archive Policy and Procedure
Approved by	General Manager
Date of Approval	21/5/2024
Version	6
Summary of content (new) or amendments (revised)	This policy has been amended to include additional information on to ensure accuracy of data. Changed logo to remove CRICOS registration number. Changed reference from EDUongo to Cloud Assess and updated the process of student's being able to change their own password in Cloud Assess. Added information about the Centrelink CRN not being kept on a student's file to meet contractual obligations.
Next Review Date	21/5/2025