INSTITUTE OF
INTELLECT BLENDING

Student Records Archiving, Retention and Retrieval Policy and Procedure

Purpose & Scope

Institute of Intellect Blending (IIB), as a Registered Training Organisation (RTO) adhere to its obligations to securely collect, retain, maintain, archive and be able to retrieve student training resources, assessment instruments, AVETMISS data, records of attainment of units of competency or subjects passed, qualifications and other relevant student documents and for periods defined in the *Required Storage Durations Table* found in this Policy and Procedure.

The guidelines contained within this policy and procedure establish a framework for IIB's obligations to records management, records retention and reporting requirements for verification and issuance of qualifications for training and assessment services delivered by IIB. These guidelines relate to and satisfy the requirements of:

- Australian Skills Quality Authority (ASQA) Standards for Registered Training Organisations 2015 and General Direction for retention requirements for completed student assessment items Clause 3.4, 3.6d and Schedule 5

- Education Services for Overseas Students Act 2000 (the ESOS Act) Part 3, Division 1, Section 21 Record Keeping

- National Code of Practice for Providers of Education and Training to Overseas Students 2018 Standard 7.7

- Australian Privacy Principles, Schedule 1 of the Privacy Act 1988

- General Direction – Retention requirements for completed student assessment items – ASQA

- The Public Records Act 1973 (Vic) (PR Act)

This policy does not take into account other legal record keeping requirements such as fees paid, refunds, and other documents.

This policy relates to how IIB staff, administer, handle, report, archive, retrieve and dispose of student paper-based and electronic records. This policy relates specifically to the auditable retention and archiving of student files and training related documents and does not relate to other business documents that do not directly pertain to training or education which may have other guidelines linked to the requirements of other entities, such as the Australian Taxation Office (ATO), unless specified by the regulators.

Definitions

APP Australian Privacy Principles

Assessment The process of collecting evidence and making judgements on whether students have performed to the required level/benchmark.

Assessment requirements The endorsed component of a VET Training Package. Assessment requirements set out the industry's approach to valid, reliable, flexible and fair assessment.

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ASQA Is the acronym for the Australian Skills Quality Authority (the national VET Regulator)

AVETMISS The acronym for the Australian Vocational Education and Training Management Information Statistical Standards. This relates to student data RTOs are required to collect from all students undertaking accredited training.

CoE Confirmation of Enrolment, required for overseas students studying in Australia.

Continuous improvement A planned and ongoing process that enables an RTO to systematically review and improve its policies, procedures, products and services to generate better outcomes for clients and to meet changing needs. It allows an RTO to constantly review its performance against the Quality Framework and to plan ongoing improvements to its performance. Continuous improvement involves collecting, analysing and acting on relevant information collected from clients and other interested parties, including the RTO's staff.

CRICOS the acronym for Commonwealth Register of Institutions and Courses for Overseas Students.

Data The information collected about aspects of an RTO's operations and performance.

National Code 2018 The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018

Record A written, printed, or electronic document providing evidence that activities have been performed.

RTO The acronym for Registered Training Organisation

Share Point Browser based intranet document management system used by IIB for the storage and management of documents.

SMS The acronym for the AVETMISS compliant Student Management System used to create electronic student files and to keep a record of student progress throughout the training.

USI Unique Student Identifier.

Policy Statement

IIB must manage records to ensure their accuracy and integrity. All records must be kept secure, and confidential information must be safeguarded at all times for protection against access by un-authorised internal and external personnel, fire, flood, and pests. Where electronic records are kept, a backup copy is also kept in a different location which must be secured by an appropriate firewall. The mechanism by which the electronic material can be retrieved must be retained so that the records can be retrieved and made available to the State Government Funding Authorities or the National Regulators upon request at no charge.

The overriding principle governing the retention of all student records is that student records of attainment of units of competency/subject and qualifications must be retained for a period of thirty (30) years and must be sufficient to reissue qualifications or statements of attainment for this period.

In line with the APP, students must be able to access their results records, and have the right to access and amend any other of their personal records which are retained. Under the terms and conditions of traineeship/apprenticeship contracts, employers and workplace supervisors are entitled to student progression reports, however information must not be disclosed to any other third party without the written consent of the student unless required under law.

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All other relevant evidence should be retained in order to demonstrate a consistency of approach, compliance with Standards and contractual agreements, and achievement of quality outcomes.

1. Record types

Record types include:

- electronic records (all information maintained on the SMS)
- records for audit purposes
- records for appeals purposes
- records of student results, qualifications and statements of attainment issued.

2. Student records

Student records include all documents that make up a student file, including:

- electronic records (all information maintained on the SMS)
- records and documents for audit purposes such as:
  - enrolment form,
  - Confirmation of Enrolment (CoE – for overseas students)
  - Language, Literacy and Numeracy skills assessment,
  - all completed assessment instruments,
  - signed assessment cover sheets,
  - signed competency checklists,
  - attendance registers,
  - any Recognition of Prior Learning, Credit Transfer,
  - study visa,
  - notifications of completion or withdrawal
  - copy of certificates, Statement of Attainments once completed or withdrawn.
  - intervention forms
- records for appeals purposes
- records of student results, qualifications and statements of attainment issued.

3. ceasing operation

In the unlikely event of IIB ceasing operation, student records and results are required to be transferred to the regulator/s within **30** days of ceasing operation. This can be in electronic or hard copy and include software details if relevant.

These records include:

- student identification (full name, date of birth, address, student ID, USI)
- student results - Qualifications/Statements of Attainment/Subjects completed issued to that student, including Qualification Code, Qualification Title, Unit Codes and Titles, issue date and parchment number

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- evidence of training and assessment activities undertaken at the time of cessation that only partly fulfil a unit of competence.

Procedures

1 Internal Archiving Procedures

Student files are, in part generated by, and managed centrally on the Student Management Systems (SMS) currently used by IIB.

The SMS platform in use at IIB is: RTO Manager (iib.rtomanager.com.au/).

2 Overseas VET Student File Archiving Process

Two (2) weeks prior to the term start, the Student Services Officer receives a Starters List report from the Student Management System (RTOM). The students are then sent an email to remind them of the commencement date and orientation day. Students are also asked to submit any outstanding or pending documents before class commencement.

At orientation, students are asked to complete *Registration Form*, *Agent Evaluation Form*, *Student Orientation Acknowledgement Form* and others documents as required and listed in the Commencement Checklist. The Student Services team enters the student's information into the student management system and scans all original documents and upload these against the students' name and date of birth in the student management system.

An Academic File is created for each new student by the Student Services Officer which are stored in filing cabinets. As student's complete assessments and other relevant documents, including records of attendance, trainers/administration file these in each student's Academic File throughout the course.

Upon completion of the course, the Education Team submits the Academic Files to the Administration Team. The files are audited and checked against the student management system to reconcile that all results have been entered correctly. Once everything is checked, and any discrepancies are clarified and rectified, qualifications (Certificates and Statements of Results) or Statements of Attainment are generated by the Student Services Officer. These documents are scanned, saved in the student's electronic file in the student management system, along with any relevant notes, and the originals are issued to the students in line with *Issuance of Qualification Policy and Procedure*. The secure electronic files are to be stored for **thirty** (**30**) years.

All audited hard copy Academic Files are placed in registered archive boxes and are securely archived on the campus for **six** (**6**) months, after which they are systematically disposed of using locked secure document bins, which are collected by an external contractor to be destroyed.

3 Required Storage Duration Table

Document /Information and Durations	Details required

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Records of RTO Registration: 30 yrs.	This includes all records of registration of the RTO, including completed original application, confirmation of registration and all completed applications for re-registration renewals.
Student enrolments: 30 yrs. A student management system is required for provision of electronic and AVETMISS compliant data is to be retained and provided in accordance with National Regulator requirements. 100% of student enrolments	This must include full name, address, date of birth and/or unique student identification number, and may include State-based student ID number. Current enrolment status with accurate qualification and unit of competency titles and codes (include proof of identification check). Signed copy of CoE form where applicable. The RTO must meet requirements for implementing a national unique student identifier.
International Student files: 2 yrs. ESOS Act 2000 (Section 21)	The training provider must retain a record of an accepted student's current residential address as supplied by the student, and must retain this record for at least 2 years after the person ceases to be an accepted student. Records do not need to be kept up to date after the cessation.
Consent forms: 2 yrs. Keep 100% of these documents	• disclosure of information (privacy) • talent release authorities • counselling forms and records
International Student: 2 yrs. Specific documents	The training provider retains specific documents pertaining to the National Code and ESOS legislation including: • Transfer Letters • Student Course Acceptance Agreement • Intervention Strategies and Action Plans Course Progress Monitoring, and any other key documents and forms that may pertain to student's enrolments.
Training & Assessment Strategies: 7 yrs. Electronic or Hard Copy	Strategies being used for qualifications currently on Scope of Registration. Superseded Strategies archived automatically on SharePoint as they are superseded.
Course Outlines and Assessment Plans: 7 yrs. Electronic or Hard Copy	Current Outlines and Plans for qualifications on Scope Superseded Course Outlines archived and clearly dated for the period they were in use. SharePoint keeps a record of these dates.

Learner Attendance, Participation, Progress, Withdrawal and Cancellation: 7 yrs. Keep 100% of these documents	All documentation relating to participation and progress at a unit of competency level – including • Enrolment form • full structured training plan for apprentices and trainees • vocational placement contact records (if applicable) • attendance/participation records (may be assessment sign-off) in structured learning activities for International Students • contact records, • progress monitoring and intervention strategies • withdrawal or cancellation documents • medical certificates, etc.
Assessment Tools and Marking Guides – Masters Retain sufficient evidence to determine what Tools and Guides were used on a given date: 5 yrs. Electronic or Hard Copy - Keep 100%	Current Assessment Tools for Scope of Registration and model answers and benchmark criteria Superseded Assessment Tools and model answers archived (includes a master copy of Workbooks) and clearly dated for the period they were in use.
Assessment Validations: 5 yrs. Retain for time of current use of the Assessment Tools or in the case of expired qualifications, until the next RTO Re-registration Audit is finalised.	Populated validation tool, validation mark-up copies, summary and sign-off sheets (with clear indication of the Assessment Tool/s and version which was validated)
Assessment Moderations: 5 yrs. Retain for time of current use of the Assessment Tools or in the case of expired qualifications, until the next RTO Re-registration Audit is finalised.	Populated moderation tool, moderation outcomes, summary and sign-off sheets (with clear indication of the Assessment Tool/s and version which was moderated)

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Records of Complaints and Appeals: 2 yrs. Keep all documentation pertaining to formal complaints and appeals for at least 2 years from final date of appeal process and outcome for external review of decisions.	Full documentation is to be retained on the students file and scanned for long term archiving. Records of complaints and appeals must only be available to authorised staff. Complainants must be provided access to documents pertaining to them upon written request.
Completed Assessments Signed and dated assessment Cover sheets and Competency 'sign-off' checklists: 7 yrs. A sample of these full assessment items should be kept for at least 10% of students for current Scope of Registration period as examples for auditors and for moderation purposes. State and campus managers are to coordinate how this is managed with the aim being a coordinated approach with moderation of assessments in mind. Electronic or Hard Copy	Assessment cover sheets must clearly document assessments used and assessment results showing the student name and identification, unit/s of competency code and title, (C, NYC, Pass, Fail, satisfactory, not satisfactory or RPL) specific type of evidence used in assessment, evidence gathered/used to justify the judgment made, summary of feedback given to the student, date of assessment, name and signature of the Assessor. Competency 'Sign-Off' Checklists and Observation Checklists signed off by the Assessor as well as the Student and any third parties, together with Assessor summary feedback given to the student, name of the Assessor and date of assessment are generally sufficient where supported by master copies of the assessment tools and marking guides/criteria or other evidence that can demonstrate how the assessor's judgment of student performance against the competency standard was achieved. While the period for the above is not specified by the regulators, some state funding bodies are specific in relation to the 7-year period.
RPL Assessments: 7 yrs. Integrity of all RPL processes should evident. Retention of RPL documentation for RTO staff is recommended to allay any perceived conflicts of interest. Electronic or Hard Copy	The integrity of the RPL process should be fully evident to an ASQA, TEQSA auditor or State and/or Commonwealth funding based auditor. Sufficient documentation and evidence to demonstrate the basis for the decision, including a checklist of what evidence was presented and the basis for the assessor's decision.

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VET - Completed Student Assessment Items (written tests, worksheets, reports, projects, etc.) **ASQA: 6 months from the date on which the judgement of competence for the student was made** Electronic or Hard Copy	Sufficient evidence of assessment required to justify the decision if there is an appeal* for all students. This may also be requested by an external auditor. *If a student believes they have been unfairly assessed or marked in their work they have the right to instigate an appeal at any time, within three (3) months from the date the assessment result was made known to the student, in accordance with the *Complaints and Appeals Policy.* An RTO is required to securely retain, and be able to produce in full at audit if requested to do so, ALL completed student assessment items for each student, for: • the duration of the RTO's assessment appeal period (3 months) or • a period of 6 months from the date on which the judgment of competence for the student was made or • the duration of the student's enrolment (variable) - whichever is the longest period.
Financial Records documenting the organizations financial transaction: 7 yrs.	As a company, records documenting the organisation's financial transactions, including revenue (from individuals, companies, government funding, etc.), expenditure, debt recovery and deposits must be retained for a minimum of 7 years after the end of each financial year in which transaction was completed, then destroyed.
Final Assessment Results and Qualifications/Statements of Attainment: 30 yrs. Date issued and including Qualification Code and Title, and all units of competence achieved – title and code Electronic or Hard Copy	We must retain the ability to reissue testamurs (the Certificate or Statement of Attainment) as a duplicate in accordance with the AQF Implementation handbook. Enough information is required to reproduce the qualification/statement of attainment. • RTO Name • RTO Number • Full student name • Student date of birth and/or identifier • Qualification, course, and units of competency achieved (title and national code) • Date of achievement

Policies and Procedures: 5 yrs. Current versions, and archived versions for the past 5 years or period of registration	Policies and procedures which were relevant to the processes at the time may need to be sighted in an audit or in the event of a complaint/grievance or enquiry. The policy and procedure register should list the period each archived policy and procedure was in place. SharePoint archives all superseded policies and procedures.
Agreements with other RTOs and other organisations for training and assessment: 7 yrs. **Agreements should include:** Name of the organisation, responsible person/s, roles and responsibilities; qualifications and/or competencies covered by the agreement, commencement and completion dates, and review date for the agreement; marketing strategies (if applicable), compliance with standards and legislation, student fees information (if applicable Training and Assessment Strategy for the program; Trainer/Assessor competency verification; record keeping arrangements; specifications for issue of qualifications and Statements of Attainment; grievance and appeals arrangements, client feedback; mechanism for reviewing and evaluating the agreement, QA requirements.	An organisation delivering training and assessment on behalf of an RTO is considered to be a delivery site of the RTO and is responsible for ensuring that all relevant records for training services delivered at these sites are available for audit purposes. RTOs are required to enter into a written agreement (MOU) with all partner training organisations and hold a Register of all agreements

Related Policies and Procedures

This policy and procedure should be read in conjunction with the other IIB policies and procedures including, but not limited to:

- Transfer Between Registered Providers Policy and Procedure

- Complaints and Appeals Policy and Procedure

- Issuance of Qualification Policy and Procedure

- Fees, Charges and Refund Policy

- Skills Recognition Policy and Procedure

- Assessment Policy and Procedure

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Appendix：1

Student Services, Admissions and Finance save any relevant student documents and communications in SMS and/or E-file	Admissions add new student to Student Management System(SMS)	Receives notification of payment, distribute Testamurs	Testamurs placed in: in file - Hard Copy on SMS - Soft Copy	Hard Copy – As archive files reach their required archive date they are disposed of using secure bins
	Academic Manager allocates to student to class	Student Services(SS) Generates testamur and await notification of fee payment	Electronic records are securely retained for at least 30 years	
	Course Coordinator creates and maintains student academic file	Student Services(SS) audits file and places hard copy into archive, recording archive box number on Register	SMS – these files are accessible for audit purposes and/or replacement testamurs to be issued	
Trainers record Unit of Competency Results in RTOM and submit paper based assessments as required to course coordinator for filing	Trainers, coordinators and Academic Managers upload relevant documents as required	On student completion Course Coordinator audits file, scans and uploads relevant documents to RTOM and submits to Admin/Student Services(SS)		

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