

# Records Management Policy

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## Records Retention and Management

At Principal Academy of Dance 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.

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 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 Principal Academy of Dance 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 students have recorded assessments evidence and assessors record assessment decisions. It may be a combination of templates, questionnaires, checklists, summary sheets, RPL tools, or records of feedback from assessors to students. Assessment resources include all those items, which substantiate the assessment decision made by an assessor.
- **Assessment tools.** Assessment tools refer to the various templates, checklists and assessment records that Principal Academy of Dance 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.
- **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 forms, privacy forms, requests for refund, etc.

- **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 and will be archived within an archive envelope 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, data registers, enrolment registers, attendance records, financial records and records of complaints and appeals.

### **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 and Principal Academy of Dance staff.
- Records must be kept to avoid damage by fire, flood, termites or any other pests.
- Student 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 also to be backed-up off site using SugarSync.

### **Period of retention**

Principal Academy of Dance 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
- TAC retention requirements for completed student assessment

In determining our period of retention, Principal Academy of Dance 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 student electronic records at Principal Academy of Dance:

- **Student results / Qualifications / Statements of Attainment.** Student 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 three (3) years from the date on which the judgement of competence for the student 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.

### **Destruction of Records**

Principal Academy of Dance CEO 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 archive register must be updated in the notes section to identify that a particular record has been destroyed.

### **Record Handling Responsibilities**

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

- The **Chief Executive Officer** is to ensure that Principal Academy of Dance 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.
- **Administrative support staff** are to ensure that procedures for the achieving and storage of records are applied including the backing up of electronic data. 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 Assessors to ensure that approaches to records handling are consistent throughout Principal Academy of Dance operation.

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

### **Archiving and Completion Procedure**

The following procedure is to be followed by all staff when archiving student records and completing an enrolment:

#### **Trainers**

- Retain all records which record information about the evidence collected during 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.
- **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 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 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 Chief Executive Officer.

- At the completion of each training module, all student records are to be sorted and placed into a Principal Academy of Dance archiving envelope. The archiving envelope will have printed on the front Principal Academy of Dance Student Archive Record. The Trainer / Assessor is to complete this form with as much detail as possible.
- The archiving envelope is **not** to be sealed and should either be handed personally to Principal Academy of Dance administrative support staff or mailed via registered express post to Principal Academy of Dance office.

## **Administration**

On receipt of the archiving envelope, the administrative staff are to:

- Conduct an audit of the student record to ensure that all evidence and assessment records (including electronic files) correspond with the units of competency being issued to the student.
- As records are received into Principal Academy of Dance office, they are to be scanned and appended to the relevant electronic file. This includes all submitted student work and evidence of assessment.
- **Important to Note:** Administrative staff are to ensure that retained evidence of assessment must have enough detail to demonstrate the assessor's judgement of the student's performance 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 for further detail and completion. Trainers who contact administration and who have issues with this arrangement are to be referred directly to the Chief Executive Officer.
- Update assessment results within RTO Data on the students training plan.
- When the student has completed all required units, update the student's Enrolment Record to record the completion of the student's training and enrolment. Create the appropriate Qualification or Statement of Attainment and produce one copy for the Chief Executive Officer to authorise. Once authorised, make a note in student's enrolment register that the certificate was dispatched and together with a letter of completion, mail the certificate to the student (registered post).
- Create a new entry in the RTO Data Archive Register and insert a hyperlink to the student's electronic file.

## 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 the Principal Academy of Dance student management system. These procedures must be strictly applied by all staff handling student records.

Combined with this, Principal Academy of Dance will also undertake periodic integrity audits of student records to ensure the information entered into the student information management system (RTO Data) are accurate. To achieve this, the office manager will undertake periodic desk audits of student records. The Office Manager will aim to undertake a desk audit of at least 10% of student records each quarter. The desk audit will be conducted by making a direct comparison with the student's record (enrolment record and assessment result) with the data entered into the student's enrolment profile within RTO Data. Specifically the desk audit will seek to identify inaccuracies in student's enrolment information and the details relating to the achievement of units of competency. The desk audit will be quality controlled and recorded using Student Records Integrity Checklist. Completed checklist will be electronically scanned and appended to the relevant student file. Identify inaccuracies will be corrected and form the basis of opportunities for improvement to improve data integrity.

## Email records and correspondence

In many cases, information relating to Principal Academy of Dance operation will be transmitted using electronic communication. It is important that this information is also retained and archived.

Any email record or correspondence which relates to training and assessment services provided by Principal Academy of Dance is to be copied or forwarded to a designated archive email address. This email database is to be backed up at least once weekly and a copy kept off-site in a secure location.

## Unique Student Identifier

The *Student Identifiers Act 2014* was approved and came into effect from the 1<sup>st</sup> January 2015. Any USI provided to Principal Academy of Dance by a student must be **verified** with the USI Registrar. This may be achieved by inserting the USI into the Student details within RTO Data and changing the USI status to "Verify". RTO Data will verify any records with the USI Registrar with this status every 30 seconds. Once verified the status will have changed to "Valid". If the status does not change to valid then one of the following student 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 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 Principal Academy of Dance **must be kept secure**. This includes the information stored within RTO Data. User profiles and password protections to RTO Data are to be used in order to prevent any unauthorised access to USI information. Where Principal Academy of Dance assisted the student to create their USI, additional details such as the students Driver's Licence information will have been collected and stored within the RTO Data - Document Verification System (DVS). Once the student'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 student'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>

### **Treatment of records on ceasing operation**

Principal Academy of Dance acknowledges that it has a responsibility to retain accurate copies of records to enable these to be transferred to TAC should Principal Academy of Dance ceased to operate. It is a requirement that RTOs who ceased to operate, must within 30 days of registration ending, forward to TAC 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, Principal Academy of Dance 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 Principal Academy of Dance during the entirety of its registration period. Principal Academy of Dance will retain

these records electronically and will provide this information in the form of the following AVETMISS reports:

- NAT00010 Training Organisation
- NAT00020 Training Organization Delivery Location
- NAT00030 Course File
- NAT00060 Module/Unit of Competency File
- NAT00080 Client File
- NAT00085 Client Postal Details File
- NAT00090 Client Disability File
- NAT00100 Client Prior Educational Achievement
- NAT00120 Enrolment File
- NAT00030 Qualification Completed File

The files must be in a nationally AVETMISS compliant format produced using our RTO Data student management system.

## Records Archiving and Completion Process

