

<b>Department</b> Retail Institute – RTO (ID4049)		
<b>Document ID</b> RI_RTO_015	<b>Title</b> Record Management – Policy and Procedures	<b>Effective</b> July 2022
<b>Version ID</b> No.1	<b>Superseding Version</b> Nil	<b>Effective</b> July 2022
<b>Associated Instrument/s</b>	Online enrolment and various paper-based enrolment forms and applicable declarations.	
<b>Approved by</b> Aaron Hines Director, ARA Retail Institute	<b>Next Review</b> July 2023	Once printed, this document is not controlled.

## 1. Policy objective

- 1.1. The objective of this Policy and procedure is to ensure that the ARA, via its training division, the ARARI, comply with the responsibilities set by law as a nationally recognised RTO.
- 1.2. This Policy ensures compliance with the record-keeping standards practised internationally, the Privacy Act 1988 (Cth), and following the Standards for RTOs 2015:
  - 1.2.1. Clauses 1.8
  - 1.2.2. Clauses 8.5
- 1.3. This Policy also acknowledges the Australian Privacy Principles (APP) and state and territorial legislation relating to Public Records. Through the application of responsible management to fulfil the maximum requirements to comply with responsible management to student records.
- 1.4. The ARARI policy and procedures on information handling are maintained and updated on the ARARI policy and procedures pages on the ARA Website.
- 1.5. The ARARI, through the application of this Policy, will:
  - 1.5.1. Outline how student records are managed and maintained.
  - 1.5.2. Specify the process, roles, and responsibilities of ARARI staff related to the completion, access, correction and maintenance, storage and destruction of a student's information.
  - 1.5.3. Ensure student course progression and prompt issuance of records (issuance of certification or attainment of competencies)
  - 1.5.4. Ensure that student's records are maintained to the minimum standards required under relevant laws and management is accountable for the management of records

## 2. Definitions

- 2.1. For the purpose of this Policy, and associated Procedures, the following definitions apply:
  - A training course - is defined as a pathway to achieving a nationally recognised qualification or skill set from an NRT package as listed on the ARA's Scope of Registration.

- For more information, go to the website: [training.gov.au](http://training.gov.au) - About
- ARA – Australian Retailers Association
- ARARI – ARA Retail Institute, the entity responsible for administering the ARA's RTO.
- USI – the Unique Student Identifier scheme administered by the USI Registrar.
- PII – Personally, Identifiable Information
- NCVET - National Centre for Vocational Education Research
- AVETMISS – Australian Vocational Education and Training Management Information Statistical Standard.
- Attendance Records – These are records of actual periods the student has been present or engaged in training and assessment as required by the training course. The information also includes all periods the student has been absent.
- Completed Assessment Item - Any document of assessment completed and resulted by an assessor, e.g., workbook, logbook, practical observation assessment.
- Cumulative Records – These are records of information related to a student's training and assessment progress.
- Confidential Record - A personal record is the recorded information related to a student's training and assessment that is judged to be extremely sensitive.
- LMS – Learning Management System
- SMS – Student Management System
- PII - Personal Identifiable Information - Means personal information as defined by the Freedom of Information and Protection of Privacy Act, such as name, citizenship, address, date of birth etc.
- Record - The Archives Act 1983 defines a 'record' as a document, or an object, in any form (including any electronic form) that is, or has been, kept because of:
  - any information or matter that it contains or that can be obtained from it; or
  - its connection with any event, person, circumstance, or thing.
- Participants Record – This means collecting records for a student, that is, a participant's attendance, confidential, cumulative, and personal records collectively.
- Students Record Management - The procedures related to - creation, collection, distribution, and use (including access and transfer), updating, protection, storage, maintenance and retention, and closure of the students' records.
- Significant Communication - A meaningful communication is an exchange between the learner and Trainer/Assessor or individual responsible for the student throughout a program that is worthy of attention, such as granted or denied assessment extensions, individual learner requirements or reasonable adjustments made.
- VET - Vocational Education and Training.
- ISO 2700 – International Standards Organisation – Information Security Management Systems

- USI - Unique Student Identifier
- Government-related related identifiers – Refer to [Chapter 9: APP9 – Adoption, use of government-related identifiers of the APP Guidelines](#). A government-related identifier is an identifier that has been assigned by an agency, a State or Territory authority, an agent of an agency or authority, or a contracted service provider for a Commonwealth or State contract.
- Information and information data - Data is a collection of values. Those values can be characters, numbers, or any other data type. If those values are not processed, they have little meaning to a human. Information is data that was processed so a human can read, understand, and use it.

### Scope

3.1. This Policy applies to all individuals who must ensure the ARARI complies with the Standards for RTOs and other laws and conforms to its conditional arrangements with other interested parties critical to the operations of the ARARI. Including: any student enrolled and participating in a nationally recognised training program within ARA's Scope of Registration,

- all ARARI staff and or other persons ("other" individuals engaged by the ARA) who facilitate student enrolment,
- all ARA Partners ("Partners" Third Party Arrangements/Agents and staff), and
- all ARARI Directors and the ARA CEO.

Out of scope: This Policy and procedures exclude records for non-nationally recognised or non-accredited courses offered by the ARARI.

### 3. Related Documents

USI Requirements – Policy and procedures

Student Information Handling – Policy and procedures

Participants Handbook

ARA RTO Privacy Statement and VET Data Statement and Declaration

### 4. Other interested parties to this Policy

Australian Government – Office of the Australian Information Commissioner

### 5. Policy

4.1. The ARARI employs the following principles when implementing a record-keeping management system:

4.1.1. The ARARI will ensure the record-keeping procedures are maintained, implemented, and reviewed to deliver consistent, efficient, effective, accurate and accountable conduct.

4.1.2. The ARARI will ensure that ARARI staff and others engaged by the ARARI to deliver services implement record-keeping practices expected by the ARARI.

- 4.1.3. The ARARI will encourage students to keep their details up to date within the ARARI learning and student management systems (LMS and SMS).
- 4.1.4. The ARARI will ensure there are processes in place to ensure records are maintained to a minimum standard and contain accurate and complete information, including marked assessments and other student documents related to enrolment and assessment, following the policy and procedures below.
- 4.1.5. The ARARI will ensure that the ARARI securely retains certificate documentation issued by the ARARI.
- 4.1.6. The ARARI will ensure that significant communications, for example, documents related to complaints and appeals, are retained security retained by the ARARI
- 4.1.7. The ARARI will ensure that effective record management facilities will provide students transition into future studies at other educational organisations.
- 4.1.8. The ARARI will ensure that its record management technologies provide state and commonwealth mandatory information data such as AVETMISS compliance and reporting to the National VET Data Collector NCVET.
- 4.1.9. The ARARI will ensure that this record management process makes information and data relating to a student available following the ARA Information Handling policies and procedures.
- 4.1.10. Student records of participation in VET are the property of the ARARI, and it is the responsibility of the ARARI Administrators and ARARI Directors to establish and maintain the Policy in the everyday duties of the ARARI.
- 4.1.11. The ARARI will only collect information from students required to conduct legitimate education activities. The primary content collected includes student enrolment detail and academic records
  - The only exception to this rule is for programs requiring ARARI to collect additional information such as government identifiers as record-keeping requirements of that agreement or contract.
  - For the purpose of this Policy item, this may be a requirement of education services delivering nationally recognised training (accredited) or non-accredited.
    - Before commencing, students must be informed about this requirement and any circumstances where additional information is required and transfer information and data to a departmental government office. A practice that ensures ARARI complies with its policy and procedures related to student information handling.
- 4.1.12. The ARARI ensures that suitable arrangements for hard and soft copy information are managed securely by individuals responsible on its training sites and the Head Office in Melbourne and offices in Sydney and Queensland.
  - This arrangement safeguards sensitive and personal information from misuse, loss, unauthorised access, modification, and disclosure.
  - Storage arrangements for archives have also safeguarded records against fire, flood, termite, and other pests.

- The student and learning management systems are primary storage places for students' information and records—the SMS and LMS. The SMS and LMS are both services as software (SAS) online-cloud-based systems for housing student academic records and assessment information. The ARARI ensures that its vendors are ISO27001 compliant and back-ups their data nightly to ensure information records are retained and secure. In addition, all data is held in Australian data centres.
- 4.1.13. The ARARI also uses secondary storage places for student information, such as Microsoft Office 365, WRIKE, and Formsite. Such systems are used for storing, receiving data, transmitting information and data from one system to another, and for project management communication.
- These secondary storage solutions are online-cloud-based SAS systems. Where possible, secondary storage is ISO certified and information data is held in data centres located in Australia.
  - The ARARI regular evaluates the use of secondary storage places and removes information and information that is no longer required for the primary purpose.
- 4.1.14. Access to the LMS allows students to correct their personal information. Access to the records held on the SMS for the correction of personal information held by the ARARI is at no charge to a current or former student following the ARARI student information handling policy and procedures.
- Students have a right to access their personal information unless prohibited by law.
  - If a student wants to examine their information, forward a request to the ARARI Student Services Department.
- 4.1.15. Staff members of the ARARI have access to relevant areas in the student and learning management systems to perform their functions and daily duties.
- 4.1.16. Automatic transfer of information for educational purposes, including verifying identification and access to government-subsidised funding, is enabled wherever existing technologies allow. The ARARI's continuous improvement strategies relating to the technologies aim to support improvement where manual entry is the only means to input information for data collection.
- 4.1.17. Archival of information and duration periods are listed in the procedures below.
- 4.1.18. Destruction and disposal of student records will align with the Australian Privacy Principles and Public Records Act. The management of this process is part of the ARARI operational activities undertaken to assure its governance and administration management responsibilities.

## **6. Responsibilities**

### **Students**

- 4.2. To ensure their details are up to date within learning management systems (LMS and SMS).
- 4.3. Keep a copy of their study assessments as the ARARI retains all original documents.
- 4.4. Ensure they securely retain any record of competencies and certificates issued by the ARARI.

### **Trainer/Assessors**

- 4.5. To encourage students to keep their details up to date within learning and student management systems.
- 4.6. Retaining all marked documents as per policy and procedures
- 4.7. Note significant communication with students in the students file in the SMS

### **The ARARI Student Services Administrators**

- 4.8. To monitor record-keeping practices.
- 4.9. Ensure the others and others engaged by the ARARI delivery services implement the record-keeping practices.
- 4.10. Ensure record-keeping procedures are maintained, implemented, and reviewed.

## **5. Procedures**

### **Students**

5.1. Students contact the ARARI Student Services Department to update their personal information ARA RI RTO Student Services by email:

Prospective students: [training@retail.org.au](mailto:training@retail.org.au)

Current students: [students@retail.org.au](mailto:students@retail.org.au)

### **ARARI Administrators**

5.1.1. The table below outlines the records of students enrolled in a training course listed on the ARA Scope of Registration as a regulated training organisation.

5.1.2. The AARA Student Service Administrator responsible for managing access to information systems must maintain the Register controlling access.

- Any Systems Administrator must report new access to the Administrator responsible for managing the Register.
- The Administrator must ensure that new employees are inducted into new systems and understand the responsibilities of their access.
- The Administrator must ensure that terminated staff and individuals engaged by the ARARI to facilitate services have their access removed to any information system holding sensitive and personal information about students, ARA and ARARI intellectual property.

5.1.3. The ARARI Administrators are responsible for the security of records maintained on-site at the Melbourne HQ, Sydney, and Queensland locations.

- Archiving includes the safe transport of files to Melbourne HQ and recording storage boxes in the ARA's Archive Register.
- ARARI must arrange for removal to the storage facility yearly.

- ARARI must identify records for safe destruction and record this information within the ARA's Archive Register.
- The management of this process is part of the ARARI operational activities undertaken as self-assurance of its governance and administration responsibilities.
- As a minimum, all academic records indicating enrolment details, units of competency started and completed a Qualification/Statement of Attainment issues for all students will be retained for thirty (30) years. This will be maintained in a format that can be transferred to ASQA

<b>Record Type</b>	<b>Record Description</b>	<b>Storage Location</b>	<b>Storage Period</b>
Pre-enrolment information	Marketing and advertising material such as - Course Catalogues - Proposals - Fee Schedules - Web information	ARA Microsoft Office 365  Record each document version	Min. 5 years
USI Information	Personal identification data required to verify USI	'Enrolment' section of SMS	Min. 30 years
Confirmation of enrolment	Training Confirmation Email	training@retail.org.au	Min. 5 years
Fees and refunds	Invoices and Receipts	Finance Department at ARA	As per ARA's Record Management policy and procedure
Course progress	Notes regarding assessment results and other course progression activities	'Notes' sections of SMS	Min. 5 years
Students' interactions	Significant activities in a student's lifecycle include annotating and resolving complaints, appeals, and incidents and injuries.	ARA Microsoft Office 365  'Notes' sections of SMS	Min. 5 years

Completed and marked assessment evidence  (Non – accredited)	The actual pieces of work completed by a participant or evidence of that work placement commenced.	LMS for students in online training  ARARI Training Drive  Paper-based records are held on-site at Melbourne HQ, Sydney and QLD, and an archive storage facility.	Min. 1 year past the course completion date.  1 year is required for validation purposes.
Assessment activities	Assessment items created for an NRT course include identification evidence, workbooks, practical assessments, LLND and Credit Transfer.	ARARI Training Drive	Min. 30 years
Assessment judgements	The assessment activity results are whether a learner is deemed ‘Satisfactory’ or ‘Not Yet Satisfactory.’	‘Assess Task’ in SMS	Min. 30 years
Unit of competency results	The grade given to a Unit of Competency that is ‘Competent,’ ‘Not Yet Competent,’ ‘Credit Transfer’.	‘Unit Info’ in SMS	Min. 30 years