



P-034 RECORDS MANAGEMENT POLICY AND PROCEDURE

P-034 Records Management Policy and Procedure v1.0

1. Purpose

The purpose of this policy is to formally define Dijan Training Program Ltd (DTP's) responsibilities in managing records across all areas of operation. This includes the systematic control of the creation, receipt, maintenance, use, access, and disposal of all documents and records in accordance with:

- The **Standards for RTOs 2015**, specifically Clauses **1.7, 3.1-3.6, 5.4, 6.5**, and **8.5-8.6**
- The **Privacy Act 1988 (Cth)** and **Australian Privacy Principles (APPs)**
- The **Student Identifiers Act 2014**
- **Funding contract recordkeeping obligations** and internal governance protocols.

This policy exists not only to ensure day-to-day efficiency but also to protect DTP legally, meet stringent **audit compliance**, and support transparency, integrity, and accountability in all training and operational activities.

Scope

This policy applies to all DTP employees, trainers, assessors, contractors, and stakeholders who create, access, manage, store, or dispose of documents in any form—digital or hard copy—that relate to the Registered Training Organisation's operational, educational, and administrative functions.

3. Policy Commitment

DTP acknowledges that proper records management is **a critical governance function**. The organisation commits to:

- **Maintaining full, accurate, reliable and secure records**
- **Ensuring continuity of evidence** for the delivery and assessment of vocational education and training
- **Supporting audit readiness** through structured document control, archiving, and access mechanisms
- **Protecting personal and sensitive information** in accordance with Commonwealth privacy laws

- **Responding quickly and compliantly** to requests from regulators, auditors, and government funding bodies

Any failure to comply with this policy will be viewed as a **serious breach of professional and legal responsibilities** and may result in disciplinary or legal action.

What Are Records?

Records are defined as any written, printed, digital, audio-visual, or electronically stored material that provides objective evidence of activities, decisions, processes, and transactions conducted by Dijan Training Program Ltd (DTP). Records serve as the formal documentation of compliance, service delivery, and administrative functions, and are critical for legal, regulatory, and audit purposes.

Records are governed by internal policy, regulatory standards, and relevant legislation, including the Standards for RTOs 2015, Privacy Act 1988, and Student Identifiers Act 2014. They must be authentic, reliable, accurate, complete, and accessible for their entire retention period.

Records at DTP fall into the following key categories:

1. Staff Records

These relate to the employment, training, and performance of DTP staff, and may include:

- Application letters, résumés, interview notes
 - Position descriptions and employment contracts
 - Qualifications, licences, transcripts, and certificates
 - Trainer matrices, professional development logs and plans
 - Leave requests, remuneration and payroll notices
 - Performance reviews, disciplinary records, and correspondence
 - Emergency contact information and attendance logs
 - Internal emails and records of staff communications
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2. Learner Records

These document all learner interactions from enquiry through to certification, and may include:

- Expressions of interest and pre-enrolment interviews
- LLN assessments and individual training plans
- Enrolment forms and USI verification
- Assessment records, evidence portfolios, and feedback forms
- Attendance sheets, participation evidence, and class logs
- Statements of Attainment and Certificates of Completion
- Financial transactions including invoices and refunds
- Correspondence such as emails, SMS, and letters
- Leave applications, complaints, and appeal forms
- Emergency contact details and support referrals

3. Organisational Records

These support DTP's governance, operations, compliance, and quality assurance processes, and may include:

- Internal and external audit reports
 - Meeting minutes and strategic planning documents
 - Memorandums of Understanding and contracts
 - Assessment validation and moderation reports
 - Version control registers and policy review logs
 - Continuous improvement registers and action plans
 - Complaint and appeal registers and determination records
 - Marketing materials and advertising approvals
 - Accounting records including budgets and reconciliations
 - Communication logs, diary entries, and general correspondence
 - Registers of training product transitions and scope updates
 - Stakeholder engagement records and partnership agreements
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All records, regardless of format or origin, are deemed official property of Dijan Training Program Ltd and must be managed in line with this policy to ensure compliance, confidentiality, accountability, and integrity of operations.

4. Legislative Framework

This policy is informed by and supports compliance with:

- **Standards for RTOs 2015**, especially Clauses:
 - **1.8** - assessment system evidence and recordkeeping
 - **3.1-3.6** - certification, AQF, and issuance records
 - **5.1-52** - pre-enrolment information management
 - **8.5-8.6** - compliance with legal obligations and cooperation with audits
 - **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**
 - **Student Identifiers Act 2014**
 - State-based funding body recordkeeping requirements
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5. Responsibilities

Role	Responsibilities
CEO	Oversight of record access and system authorisation

Role	Responsibilities
RTO Business Manager/Senior Compliance Manager	Audit coordination, data quality monitoring, and version control
Admin Team-Delegated Person	Day-to-day record handling, scanning, and secure archiving
Trainers/Assessors	Accurate completion and submission of assessment and participation records
RTO Business Manager/Senior Compliance Manager	Supervision of learning evidence, validation documentation, and system integrity

6. Procedures

6.1 Record Identification and Classification

Records are categorised as:

- **Learner Records:** Enrolments, USI, LLN results, training plans, assessment evidence, progress reports, complaints, SoAs, and certificates
- **Staff Records:** Recruitment, qualifications, PD logs, contracts, performance reviews, WWCC
- **Operational Records:** Validation/moderation, meetings, registers, incident reports, complaints, stakeholder engagement
- **Compliance Records:** Audit reports, continuous improvement actions, self-assessments
- **Financial Records:** Invoices, receipts, fee statements, refund requests
- **Marketing and Communication Records:** Promotional material, approvals, website content, advertising registers

All documents must be **dated, version-controlled, signed (where required), and traceable to their source.**

6.2 Storage and Security

Record Type	Storage Method	Security
Paper-based	Locked filing cabinet, restricted access	Key/lock control and monitored premises via

Record Type	Storage Method	Security
		alarm system, remote control security gates
Digital	Cloud Assess (SMS), SharePoint, secure cloud	Passwords, role-based access

***Cloud Assess implement seven (7) levels of data security. All records are held in Australia**

- **Offsite backups** are maintained.
- **Disaster recovery plan** ensures minimum disruption and data integrity.

6.3 Access and Retrieval

- **Learner access** to records is permitted via written request Learner Access to Records Request Form
- **Staff access** to personal records is permitted via email request to HR.
- **Internal record retrieval** to learner records is permitted via email request to RTO Business Manager/Senior Compliance Manager and must be logged and trackable via the Access to Records Register.

*Auditors and regulatory officers will be given secure, supervised access to requested records **within 48 hours** or as required.

All **document access is logged** in the Access to Records Register

- maintained by the RTO Business Manager onsite or Senior Compliance Manager for electronic records.

6.4 Retention and Disposal Schedule

Record Type	Retention Period	Audit Expectation
AVETMISS, certification records	30 years	Must be stored securely and retrievable (schedule 5.4)
Assessment evidence	6 months post judgement date-competency decision Funding requirements may differ	Must be complete and aligned to unit mapping
Enrolment and ID data	30 years	Required for ASQA and state audits

Record Type	Retention Period	Audit Expectation
Participation (e.g. attendance sheets, progress)	7 years	Must validate training delivery for funding
Teacher files (qualifications, PD)	7 years from the date of termination	Must demonstrate Clause 1.13-1.16 compliance
Continuous improvement register	5 Years	
Complaints, appeals	5 years	To support Clause 6.1-6.5 during audits
CI records (registers, actions)	5 years	Clause 2.2 compliance evidence
Financial records	7 years	In line with ATO and audit requirements
Marketing materials	2 years	Must show compliance with Clauses 4.1, 5.1-5.3

7 . Destruction and Archiving

- Destruction occurs only after retention period expires and is authorised by the CEO/Executive Director.
- **Secure disposal methods** include:
 - Secure document shredding
 - Secure data deletion tools for electronic files
- Archived records are stored in climate-controlled, restricted access facilities.
- **Destruction via the** *Access to Records Register* are maintained for audit verification.

8 . Audit Readiness Measures

To support audit readiness:

- A **Certification Summary Audit Form** is completed before any AQF certification.
- An internal Audit on Learner Files is performed quarterly using the **Internal Audit Learner Files Form**.
- All mandatory forms (e.g., SoA issuance register, validation register/documents, meeting minutes, complaint registers) are **centralised** and version-controlled.
- **Training register and communications** are maintained for all trainers and administrative staff.

- All staff receive **annual training** on records management and audit compliance
 - A **centralised audit folder** includes:
 - Sample learner files (de-identified)
 - Records practices are reviewed annually and updated following any changes to legislation, training package requirements, or audit findings
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9. Related Documents and Forms

- Learner Permission Form
 - Learner Access to Records Request Form
 - Learner Assessment Appeals Form
 - Complaints Form
 - Complaints and Appeals Policy and Procedure
 - Learner Privacy Policy
 - Certification Issuance Policy and Procedure
 - Certification Summary Audit Form
 - Teacher-Assessor Qualification Mapping Register
 - Teacher & Assessor Profile
 - Certification and SoA Issuance Register
 - Cloud Assess Access Protocol
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10. Review and Continuous Improvement

This policy will be reviewed annually or upon:

- Changes to relevant legislation
 - Feedback from audit findings
 - Technological or operational changes impacting recordkeeping
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Standards for RTOs 2015

- Clause 1.7 - Ensures valid assessment documentation is accessible and complete
- Clause 3.1-3.5 - Guarantees retention, availability, and secure issuance of certification documentation

- Clause 6.5 - Protects and manages complaint and appeal records
- Clause 7.5 - Ensures evidence of trainer/assessor competency and PD is retained and retrievable
- Clause 8.5-8.6 - Enforces legal compliance and cooperation with the regulator