| ACA Policy and Procedure | | | |
|---|---|---|---|
| **Doc #: PP-2.9** | | **Title: Student Records Management** | |
| **RTO Standards 2025: Division 2, Clause 10** | **NC: 8** | | |
| **Rev #: 9** | | **Approved By: Bibhod Dotel** | **Date: 29/06/2025** |

| REVISION HISTORY | | | |
|---|---|---|---|
| **Rev** | **Description of Change** | **Author** | **Effective Date** |
| 1 | Adapted from AAPoly's Student Records Management Procedure. | Zita | 06/03/14 |
| 2 | Updated section 5.3.2 (Paradigm prompt) from 6 months to 3 months. | Prasad/Zita | 17/09/14 |
| 3 | Changed SNR 16.6,17.4,19.1,23.3 and 23.4 to Standards ,7.5,8.1 and 8.5. | Jeevan | 01/04/15 |
| 4 | Standard 7.5 has been removed. Standard 3.4 and 8.6 have been added. | Prasad | 01/04/16 |
| 5 | Updated mapping to the new National Code 2018 standards. | Elaine | 09/03/18 |
| 6 | Removed reference to retention of hard copy of student result in Appendix 7.1. | Elaine | 01/10/19 |
| 7 | Updated to meet the Revised Standards for RTOs.<br><br>Updated the retention requirements for VET student assessment items.<br><br>Updated the retention requirements for AQF certification documentation. | Moinul & Maria | 04/03/25 |
| 8 | Update the mapping of the National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025. | Maria | 22/04/25 |
| 9 | Updated to align with ACA Data and Records Management Policy and Procedures | Krisha | 27/06/25 |

| ACA Policy and Procedure | | | |
|---|---|---|---|
| **Doc #: PP-2.9** | | **Title: Student Records Management** | |
| **RTO Standards 2025: Division 2, Clause 10** | **NC: 8** | | |
| **Rev #: 9** | | **Approved By: Bibhod Dotel** | **Date: 29/06/2025** |

## 1.0 Purpose

**1.1** The purpose of this policy and procedure is to outline the principles and processes for managing student records for both domestic and international students enrolled in VET courses delivered by Academies Australasia (ACA) colleges as listed in Schedule 1. This policy ensures compliance with the Standards for RTOs 2015 (and forthcoming 2025 version, where applicable), the National Code of Practice for Providers of Education and Training to Overseas Students 2018, the ESOS Act 2000, and the VET Student Loans Act 2016 and associated Rules.

**1.2** This policy supports ACA's obligations to maintain accurate, secure, and accessible student records for the purposes of compliance reporting, student support, funding audits, and continuous improvement.

## 2.0 Scope

**2.1** This policy and procedure applies to all staff involved in the creation, management, storage, and disposal of student records.
**2.2** This policy covers the records of both international and domestic students.

## 3.0 Definitions

**3.1 Confidential Information –** Any personal, academic, or financial information must be protected in accordance with privacy legislation and internal policy.

**3.2 Data –** Raw facts, figures, symbols, or values (whether qualitative or quantitative) that are collected, generated, or processed by the provider through its educational, administrative, and operational activities.

**3.3 Destruction –** The secure and irreversible disposal or erasure of records after the applicable retention period has expired.

**3.4 Domestic Student –** A student who is an Australian citizen, permanent resident, or a holder of an eligible visa studying in Australia and not subject to CRICOS enrolment or ESOS Act provisions.

**3.5 International Student –** A student who is not a citizen or permanent resident of Australia and holds a student visa, studying in Australia under the ESOS Act and National Code.

**3.6 Records** – All information, whether physical or digital, that is created, received, or maintained by the provider in the course of its operations. Records provide evidence of decisions, transactions, communications, and activities, and may relate to students, staff, financial management, compliance, academic delivery, or institutional governance.

**3.7 Retention –** The period of time records must be securely stored and maintained to meet regulatory, legal, and operational requirements.

**3.8 Student Records –** All records associated with a student's engagement with the provider. This includes enrolment forms, identification documents, academic results, training plans, attendance logs, intervention strategies, correspondence, payment records, loan documentation, complaints and appeals, and any other document required by legislation or standards.

**3.9 Student Management System (SMS) –** A secure digital platform used to manage student-related information and records, including enrolment details, progress, assessment outcomes, attendance, and financial transactions.

## 4.0 Responsibilities

**4.1 All Staff –** regardless of role, must follow the organisation's records management procedures relevant to their duties. They must handle records confidentially and responsibly, report any discrepancies or unauthorised access, and support the integrity and security of all data and documentation.

**4.2 Admissions Officer –** Responsible for the accurate collection, verification, and entry of student information during the admissions and enrolment process. This includes maintaining complete records of student applications, identification documents, entry requirements and signed agreements. They must ensure all required student details are entered correctly into the SMS at the point of enrolment, in compliance with legislative and regulatory requirements. Admissions staff are also responsible for ensuring that relevant enrolment evidence is retained to support audits and reporting, including VSL and CRICOS compliance.

**4.3 Chief Executive Officer (CEO) –** holds overall accountability for ensuring that the provider maintains compliant records management systems and practices. This includes ensuring the organisation meets its obligations under the Standards for RTOs, the National Code 2018, the ESOS Act 2000, the VET Student Loans Act 2016, and any relevant state or funding body requirements.

**4.4 Compliance Manager –** responsible for overseeing the implementation and ongoing monitoring of recordkeeping practices. This includes ensuring that record retention, reporting, and disposal requirements are met; supporting internal and

external audits; and maintaining up-to-date knowledge of relevant compliance obligations across all student types and education sectors.

**4.5 Designated Head, Student Services (DH (SS)) –** Responsible for overseeing the implementation of this procedure by ensuring all relevant records are properly maintained, securely stored, and readily accessible when required. Delegates tasks as appropriate to ensure compliance with retention and access requirements.

**4.6 Finance Team –** Accountable for maintaining accurate financial records, including those related to student fees, loan arrangements, and progression reporting. Ensures compliance with the VET Student Loans Act and Rules and that all related documentation is retained securely for the required duration and is accessible for audit and review purposes.

**4.7 Group General Manager, Cyber Security** – Provides strategic oversight of records management practices ensuring data integrity, system security, and compliance with regulatory requirements. Works closely with the IT team to maintain secure and reliable student management systems and supports continuous improvement in recordkeeping and reporting processes.

**4.8 IT and Systems Administrator** – Responsible for the security, functionality, and backup of the digital infrastructure used to store and manage records, including the Student Management System. This role includes ensuring proper user access controls, safeguarding against data loss or breaches, and facilitating the secure archival and disposal of electronic records in line with approved retention schedules.

**4.9 Training/Academic Managers, and Coordinators –** Responsible for ensuring that all student academic records are complete, accurate, and regularly updated in the SMS. This includes records relating to attendance, assessment outcomes, academic progress, marking, assessment judgements, retained evidence of competency, records of course credits granted, course variations such as changes to study load or duration, and communications and correspondence with students relating to their academic progress or course matters. They must ensure that trainers and assessors maintain thorough documentation in accordance with training package requirements and assessment standards. In addition, Training and Academic Managers are expected to monitor staff compliance with recordkeeping procedures, support internal and external audits, and contribute to continuous improvement processes by identifying and addressing gaps in academic record management.

**4.10 Student Services (SS) –** Responsible for maintaining up-to-date records throughout the student's lifecycle. Ensures accurate and timely documentation of

student communications, complaints and appeals, attendance follow-up, and any administrative actions taken.

## 5.0 Procedure

### 5.1 Student Record Creation and Maintenance

**5.1.1** Upon enrolment, a student file is created, and a unique record is established in the SMS.

**5.1.2** Throughout the course, student records, including enrolment details, academic progress, assessment outcomes, attendance, communications, course variations (e.g. deferral, extension), and support interventions, are continuously updated and maintained in Paradigm and in the physical student file.

**5.1.3** Students are encouraged to review and confirm their details at least every three months and must notify the provider of any changes within seven (7) calendar days of the change.

**5.1.4** Any change to a student's enrolment or personal details must be recorded and actioned in accordance with applicable regulatory and funding requirements.

- For international students, updates must be reported on PRISMS within 14 calendar days of the change
- For domestic students, including those under VSL or other government-funded programs, changes must be reported or recorded within the timeframes specified by the relevant funding contract, program guidelines, or legislative requirements.

### 5.2 Assessment Records

**5.2.1** Trainers and assessors enter unit/subject results into SMS upon completion and submit all completed assessment evidence to the Course Coordinator (CC).

**5.2.2** All assessment items, including marking tools, assessment judgements, student submissions, and feedback, are stored securely and labelled according to the College's archiving system.

**5.2.3** These records are securely stored and retained either in archive boxes using the approved provider box label template or in approved digital storage systems, in accordance with the *ACA Data and Records Management Policy and Procedures* and all applicable legislative, regulatory, and funding body requirements.

### 5.3 Completion of Course

**5.3.1** Upon course completion, SS issues the appropriate certification documentations in accordance with the Issuance of Certification Documentation Policy.
**5.3.2** A digital copy of the certificate is saved in Paradigm.
**5.3.3** The student's enrolment status is updated in the SMS.

### 5.4 Retention Requirements

**5.4.1** Student records, including assessment and certification documentation, are retained for the minimum periods outlined in Appendix 7.1

### 5.5 Student details updates (ESOS Section 21 Record Keeping requirement)

**5.5.1** In accordance with the ESOS Act 2000 and, registered providers must maintain up-to-date records for each accepted overseas student who is enrolled or has paid any tuition fees for a course.
**5.5.2** The following information must be recorded and kept current for each accepted student:
(a) the student's current residential address;
(b) the student's mobile phone number (if any);
(c) the student's email address (if any);
(d) any other details prescribed by the regulations

### 5.6 Destruction of Student Records

**5.6.1** The (DH VET) is solely authorised to approve the destruction of records, and such approval must be provided in writing.
**5.6.2** Records may only be destroyed once the required retention period has expired, in accordance with applicable regulatory, legislative, and contractual requirements.
**5.6.3** Records identified for destruction must be reviewed for eligibility and logged in the Destruction Register.
**5.6.4** All approved documents must be destroyed securely to ensure confidentiality, data protection, and compliance with the ACA Data and Records Management Policy and Procedures.

### 5.7 Access to Student Records

The College implements control and access to confidential data and files by:

- Maintaining and securing confidential files separately from general files;
- Ensuring confidential files are accessed only by authorised personnel;
- Password-protected data entry and retrieval files.

### 5.8 Security and retention of records

**5.8.1** The College monitors and maintains electronic records through delegated password-protected access. Hard copy confidential files are stored in locked filing cabinets.

**5.8.2** Server back-ups are done on a weekly basis and stored off-site by the IT Manager.

**5.8.3** All archived student files are kept as quality records and shall be retained by the College according to the records management policy.

**5.8.4** To ensure records are maintained in a safe and suitable condition, the following applies:

- Records are kept securely to prevent them from being accessed by any non-authorised personnel.
- Records are kept confidential to safeguard information and to protect the privacy of students and College staff.
- Records are kept in such a manner so as to avoid damage by fire, flood, termites or any other pests.
- Student results and Qualification or Statements of Attainment are backed-up and stored electronically and are available to be retrieved by authorised persons at any time. Electronic data is also to be backed-up off site.

### 5.9 Delegated Information Access

Access to files is limited to staff authorised to check the accuracy of records received, enter and retrieve data, maintain the records and archive closed files and past records.

## 6.0 References

**6.1** ACA Data and Records Management Policy and Procedure
**6.2** Standards for Registered Training Organisations (RTOs) 2015 (and forthcoming 2025 version)
**6.3** National Code of Practice for Providers of Education and Training to Overseas Students 2018
**6.4** Education Services for Overseas Students Act 2000 (ESOS Act)
**6.5** VET Student Loans Act 2016
**6.6** VET Student Loans Rules 2016

## 7.0 Appendices

**7.1** Student Record Management and Retention Period Table

**7.2** ACA Archive Register Template
**7.3** ACA Box Label Template

## Appendix 7.1: Student Record Management and Retention Period table

The student records are collected and maintained through a student "life cycle":

| Record Type | Minimum Retention Period | Relevant Legislation/Standard |
|---|---|---|
| Student Enrolment and Admission Records | Minimum 2 years after enrolment cessation | National Code 2018, ESOS Act 2000 |
| Assessment records submitted by students (e.g. completed assessment tasks, evidence portfolios) | 2 years after the student has completed the training product | RTO Standards 2025 |
| AQF certification documentation (including Testamurs and Statements of Attainment issued to VET students) | Minimum 30 years | RTO Standards 2025, AQF Qualifications Register Policy |
| International Student Visa and PRISMS Reports | Minimum 2 years after enrolment cessation | National Code 2018, ESOS Act 2000 |
| Complaints, Appeals, and Disciplinary Records | Minimum 5 years after case closure | RTO Standards, ESOS Act |
| Staff Employment and Payroll Records | Minimum 7 years | Fair Work Act 2009, Privacy Act 1988 |
| Governance and Audit Documentation | Minimum 7 years | Corporations Act 2001 |
| **VET Student Loans – Specific Retention Obligations (5 Years)** | | |
| **VSL Record Type** | **Minimum Retention Period** | **Relevant Legislation/Standard** |
| Information provided to students before enrolment (per Section 98) | 5 years | VSL Rules 2016 |
| Academic suitability assessments | 5 years | VSL Rules 2016 |
| Enrolment records, including date and time | 5 years | VSL Rules 2016 |
| VET Student Loan application information and supporting documents | 5 years | VSL Rules 2016 |
| Date/time of loan application submission | 5 years | VSL Rules 2016 |
| Correspondence with students or parents/guardians | 5 years | VSL Rules 2016 |
| Records of use of grievance procedure | 5 years | VSL Rules 2016 |

| | | |
|---|---|---|
| Tuition fees and census dates for approved courses | 5 years | VSL Rules 2016 |
| Versions of policies/procedures required under VSL Rules | 5 years | VSL Rules 2016 |
| Marketing and promotional materials related to approved courses | 5 years | VSL Rules 2016 |

## Schedule 1: Academies Australasia Colleges (ACA)

| |
|---|
| Academies Australasia Institute (AAI) |
| Academies Australasia Polytechnic (AAPoly) Vocational |
| Academy of English (AOE) |
| Australian College of Technology (ACT) |
| Australian International High School (AIHS) |
| Clarendon Business College (CBC) |
| Supreme Business College (SBC) |
| Skills Training Australasia (STA) |