Records Management Policy and Procedure

1. Purpose

The purpose of this policy is to ensure that Vigil International College complies with the record-keeping requirements of the National Code of Practice 2018. This policy establishes procedures for retaining and managing records in compliance with relevant regulatory obligations, particularly the requirement to retain student records for at least two (2) years after the student ceases to be an accepted student.

2. Policy Statement

The College is committed to maintaining accurate and secure records in compliance with the National Code 2018 and the Education Services for Overseas Students Act 2000 (ESOS Act). The College ensures that all student-related records, including written agreements, payment receipts, student transfer requests, and critical incident reports, are securely stored and retained for the prescribed duration.

<u>This policy is to be read in conjunction with the Standards for RTOs Records Management Policy and Procedure.</u>

Definitions
Accepted Student: A student who has formally accepted an offer of enrolment and is enrolled in a registered course.
Records: Any documents (electronic or physical) related to student enrolment, payments, academic progress, complaints, and appeals.
Retention Period: The duration for which records must be stored as per regulatory requirements.

3. Responsibility

Chief Executive Officer (CEO): Ensures compliance with this policy and oversees records management.
Administration Manager: Responsible for student progress and attendance records being securely stored and the storing, managing, and ensuring the timely retention and disposal of records.
Student Support Staff: Maintains accurate records related to student services, enrolments, and financial transactions.
Academic Staff: Ensures student progress and attendance records are properly recorded.

4. Requirements

The following National Code 2018 standards mandate record retention:
Standard 3.6: Written agreements and receipts of student payments must be retained for at least two (2) years after the student ceases to be accepted.
Standard 6.8: Records of critical incidents and remedial actions must be retained for at least two (2) years after the student ceases to be accepted.
Standard 7.7: Transfer requests, including assessments and decisions, must be retained for at least two (2) years after the student ceases to be accepted.
This policy and procedure is additionally subject to the *Standards for RTOs 2025*.
Standards for RTOs 2025 – Outcome Standards
Outcome Standard 2.1 – Access to clear and accurate information
VET students have access to clear and accurate information concerning the organisation, the relevant training product, and students are made aware of any changes that may affect them.
(2)(e): That it informs VET students, as soon as practicable, of any changes to training products or the organisation's operations that may affect VET students, including any changes relating to the transition of superseded, deleted, or expired training products.
Outcome Standard 4.2 – Roles and responsibilities of staff and third parties
(2)(d): The roles and responsibilities of persons engaged by the organisation are well-understood and documented, ensuring accountable decision-making.
Outcome Standard 4.4 – Continuous improvement
(2)(c): It has mechanisms in place to lawfully collect and analyse data including any feedback received from VET students, staff, industry, VET regulators, State and Territory training authorities and employers of current or former VET students.

Full procedural and implementation details relating to these national VET requirements are provided in the Standards for RTOs 2025 Policy and Procedure Manual.

5. Scope

This policy applies to all employees involved in record-keeping and student data management, covering:

- Written agreements
- Student payment receipts
- Student transfers and releases
- Complaints and appeals records

- Student progress, attendance, and visa compliance records
- Critical incident reports

6. Procedure

6.1 Record Creation and Storage

- All student-related records must be securely stored in the Student Management System (SMS) and financial management system.
- Hardcopy documents must be filed securely in locked cabinets.

6.2 Retention and Access

- Records of written agreements and payment receipts must be retained for at least two (2) years after the student ceases enrolment.
- Transfer requests and related documentation must also be retained for at least two (2) years after the student ceases enrolment.
- Critical incident records must be stored securely and retained for at least two (2) years post-enrolment.
- Staff responsible for data entry must ensure records are updated accurately and promptly.
- Access to records is restricted to authorised personnel only.

6.3 Record Disposal

- After the two-year retention period, records may be securely disposed of via shredding (hardcopy) or permanent deletion (electronic records) following data security guidelines.
- The Administration Manager oversees the disposal process and maintains a log of records that have been securely destroyed.

Procedure Summary Table

Step	Procedure	Responsible Party	Retention/Notes
1.	Record Creation and Storage	All staff handling student data	
2.	Enter all student-related records into the Student Management System (SMS) and financial management system.	Administration Staff, Trainers, Finance Officers	Records must be accurate and current.
3.	File hardcopy documents securely in locked cabinets.	Administration Staff	Ensure access is restricted.
4.	Retention and Access	Administration Manager	

5.	Retain written agreements and payment receipts for at least 2 years after the student ceases enrolment.	Administration Staff	Required under National Code Clause 3.6.
6.	Retain transfer requests and supporting documentation for 2 years post-enrolment.	Administration Staff	Required under National Code Clause 7.7.
7.	Retain critical incident documentation for 2 years after enrolment ends.	Student Support or Admin Staff	Required under National Code Clause 6.8.
8.	Update records accurately and promptly upon receiving new information.	All data-entry personnel	Errors must be corrected immediately.
9.	Restrict access to records to authorised personnel only.	Administration Manager	Ensure data privacy and integrity.
10.	Record Disposal	Administration Manager	
11.	Dispose of records securely after the two-year retention period via shredding (hardcopy) or permanent deletion (digital).	Admin Officer under Manager supervision	Follow data security and disposal protocols.
12.	Maintain a disposal log identifying the records destroyed.	Administration Manager	Log must be auditable and securely stored.

7. Policy Implementation

This policy will be made available to all staff members and stakeholders through the internal communication channels.

- The Administration Manager is responsible for implementing and monitoring compliance with this policy.
- Staff training on records management will be conducted annually to ensure awareness and compliance.
- Periodic audits will be performed to verify compliance with retention requirements.

8. Review and Continuous Improvement

This Policy and Procedure will undergo an annual review, or sooner if required, to ensure it remains relevant and effective in guiding the operations and strategies or as needed to reflect any changes in the regulatory environment or operational practices.

Feedback will be collated and analysed and discussed at the monthly management meetings, for noting or action with any necessary changes documented in a Continuous Improvement Form and in the Continuous Improvement Register.

The College continually reviews these procedures with stakeholders to ensure record keeping procedures are maintained, implemented, reviewed and continually reviewed.

Document Control

Version number:	V1	Approved by:	CEO
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Standards 2025: 2.1, 4.2, 4,4 National Code 2018: Clause 3.6, 6.8, 7.7			

Version Control

Version #	**Changes**	**Approval By**	**Approval Date**
1.0	Original Version	CEO	01/06/2025

Associated documents

Complaints and Appeals Policy
Continuous Improvement Form
Continuous Improvement Register.
Financial Management and Viability Policy and Procedure
Student Enrolment Policy
Records Disposal Policy