

vision for the future



RTO ADMINISTRATION

Retention of Evidence

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NATIONAL VET CONFERENCE
GOLD COAST 2021

#2021NVC

WHAT WE WILL COVER

- Overview of record-keeping requirements for RTOs
- Retention of assessment materials
- Issuance and re-issuance of certification
- Good record-keeping practice

[consult dg]

WHAT ARE RECORDS?

NVR Act 2011:

- *VET student records* ... means a document, or an object, in any form (including any electronic form) that is, or has been, kept by a person because of its connection with a current or former VET student of the organisation ...

Standards for RTOs 2015:

- *Record* means a written, printed, or electronic document providing evidence that activities have been performed

[consult dg]

KEY MESSAGE

- The most important records are those that provide '**evidence that activities have been performed**'
- One of the most common causes of non-compliance is not creating and retaining evidence that strategies and procedures have been **implemented**

[consult dg]

WHERE ARE RECORDS PRESCRIBED?

All VET students:

- National Vocational Education and Training Regulator Act 2011
- National Vocational Education and Training Regulator Regulations 2011
- Standards for Registered Training Organisations 2015
- National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020
- Australian Qualifications Framework

[consult dg]

WHERE ARE RECORDS PRESCRIBED?

Overseas students:

- Education Services for Overseas Students Act 2000
- Education Services for Overseas Students Regulations 2019
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- ELICOS Standards 2018

[consult dg]

STANDARDS FOR RTOS

The Standards for RTOs 2015 require a wide variety of records to be created and retained. The most well-understood are:

- Training and assessment strategies
- Trainers' and assessors' qualifications, experience and currency
- Third-party agreements
- Issuance of AQF certification
- Marketing information
- Complaints

[consult dg]

RETENTION OF ASSESSMENT RECORDS

ASQA's General Direction – retention requirements for completed student assessment items is made under section 28(1) of the NVR Act

... securely retain, and be able to produce in full at audit if requested to do so, all completed student assessment items for each student ... for a period of six months from the date on which the judgement of competence for the student was made

For overseas students, the ESOS Act requires that assessment records be kept for two years after the learner's enrolment ceases

[consult dg]

DATA PROVISION REQUIREMENTS

AVETMISS Data (s 7)

- Annual submission of data (Total VET Activity)
- May serve the requirement to maintain records for 30 years

Business Information (s 8)

- Information must also be provided if any of these change

Quality Indicators (s 9)

- Annual summary report

[consult dg]

AUSTRALIAN QUALIFICATIONS FRAMEWORK

AQF Qualifications Issuance Policy

RTOs must:

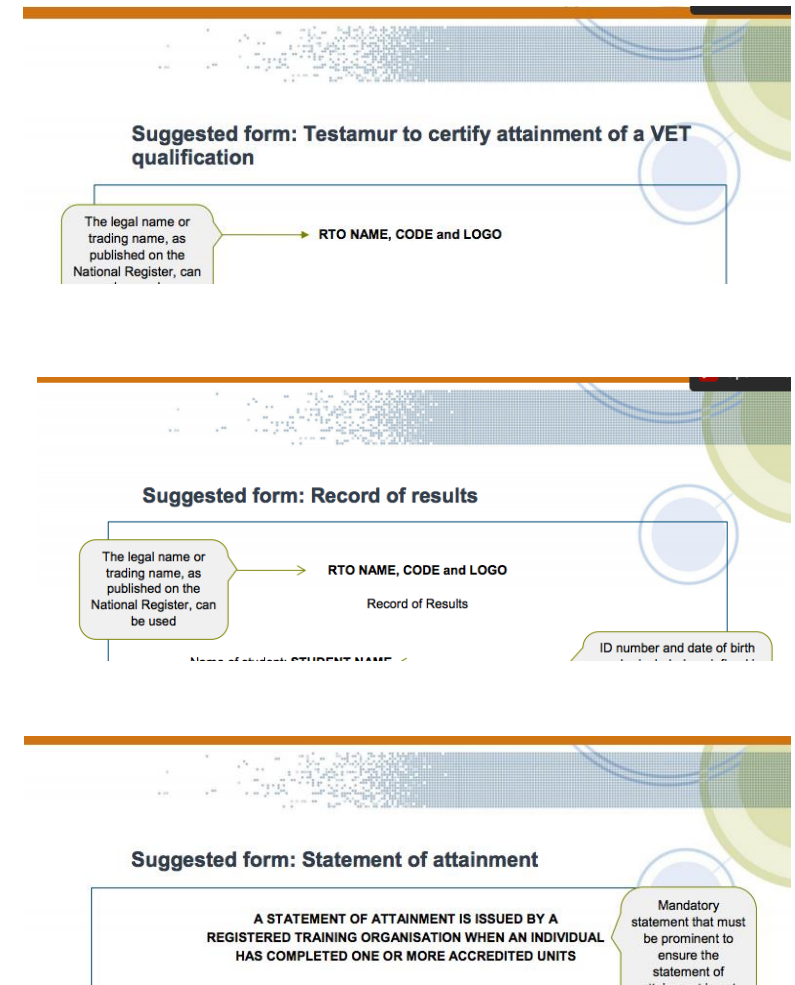
- maintain a register of all AQF qualifications they are authorised to issue
- maintain a register of all AQF qualifications they issue to graduates

The Standards for RTOs require that Statements of Attainment be issued when a learner has completed one or more accredited units (Clause 3.3)

[consult dg]

FORMAT OF AQF CERTIFICATION

- The requirements for what information must be included on AQF certification are governed by both the AQF and the Standards for RTOs
- For detailed guidance, search 'AQF certification samples' on ASQA's Web site
- Requirements for logos are commonly confused:
 - NRT logo – qualifications and statements of attainment only
 - AQF logo – qualifications only



[consult dg]

RE-ISSUANCE OF AQF CERTIFICATION

It is common for RTOs to be requested to provide replacement certification and the AQF requires that RTOs have a policy for this

- Ensure you are only issuing replacement certification to the person it was issued to
- Verify the details of what was originally issued before providing a replacement
- Your RTO's policy should cover how to manage dates on certification and whether to identify the replacement as not being an 'original document'
- Record the details of re-issued certification in your RTO's certification register

[consult dg]

ESOS ACT & REGULATIONS

ESOS Act

- PRISMS data (s 19)
- Record keeping (s 21)
- Agents (s 21A)

ESOS Regulations (s 13)

- Student information
- Agent information

[consult dg]

OTHER REQUIREMENTS

If your RTO is accessing public funding arrangements or delivers courses that result in licenced outcomes, there may be additional record-keeping requirements. These may include:

- Additional periods to retain assessment records
- Additional evidence of identity or eligibility
- Details of attendance at training

[consult dg]

A NOTE ON PRIVACY

While many RTOs are not covered by the Privacy Act, on the basis of being considered a small business (less than \$3M annual turnover), all RTOs are collecting and retaining personal information of learners and other parties.

Even if the Privacy Act does not apply, you should make yourself familiar with and follow the principles that are relevant. A couple of areas where RTOs are most at risk are:

- Retaining identification documents and information insecurely
- Retaining credit card information when it is no longer required

[consult dg]

KEY MESSAGE

- No matter how well your RTO is performing, the time will come when you need to demonstrate this
- Being able to retrieve the evidence of your performance quickly and efficiently will lead to a painless audit
- Good record-keeping practice is essential

[consult dg]

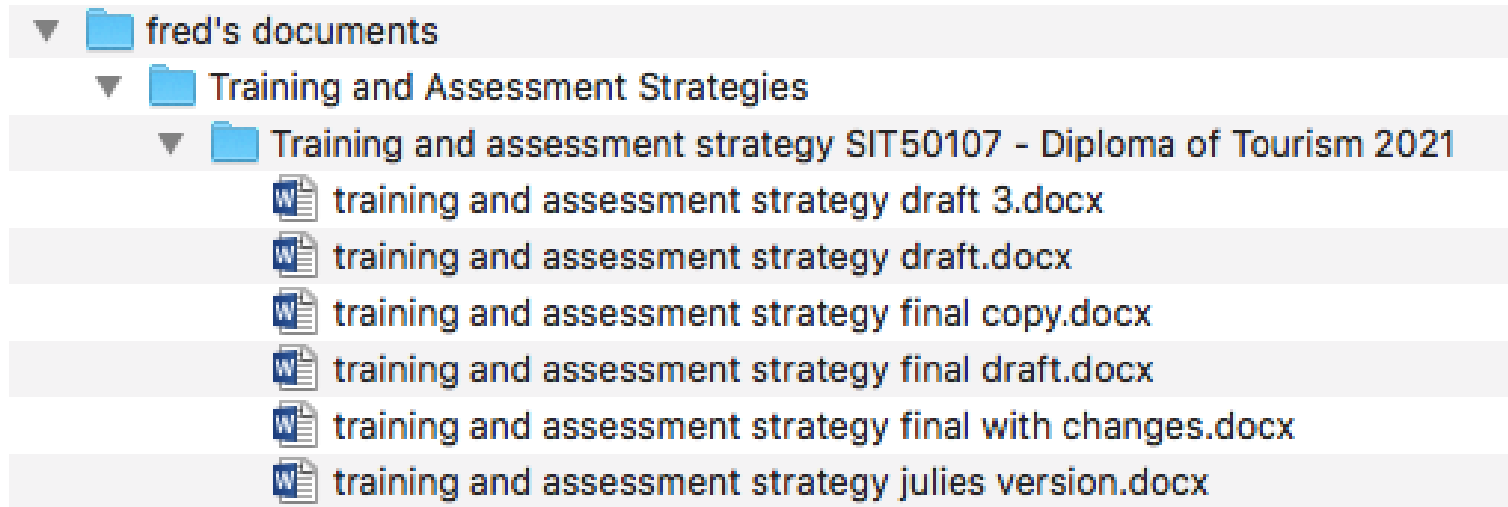
GOOD RECORD-KEEPING PRACTICE

- Records that are not retained in a logical and orderly manner cannot be readily retrieved
- Hard-copy records are generally stored in alphabetical order and/or by date or other reference and can be readily located by 'browsing' if necessary
- People often don't see the need for the same structure when it comes to digital records, but it is even more important to have and implement sound administrative practices for such records
- Relying on search mechanisms to locate files often results in large numbers of matches and sorting through them can be time-consuming

[consult dg]

GOOD RECORD-KEEPING PRACTICE

What's wrong with this picture?

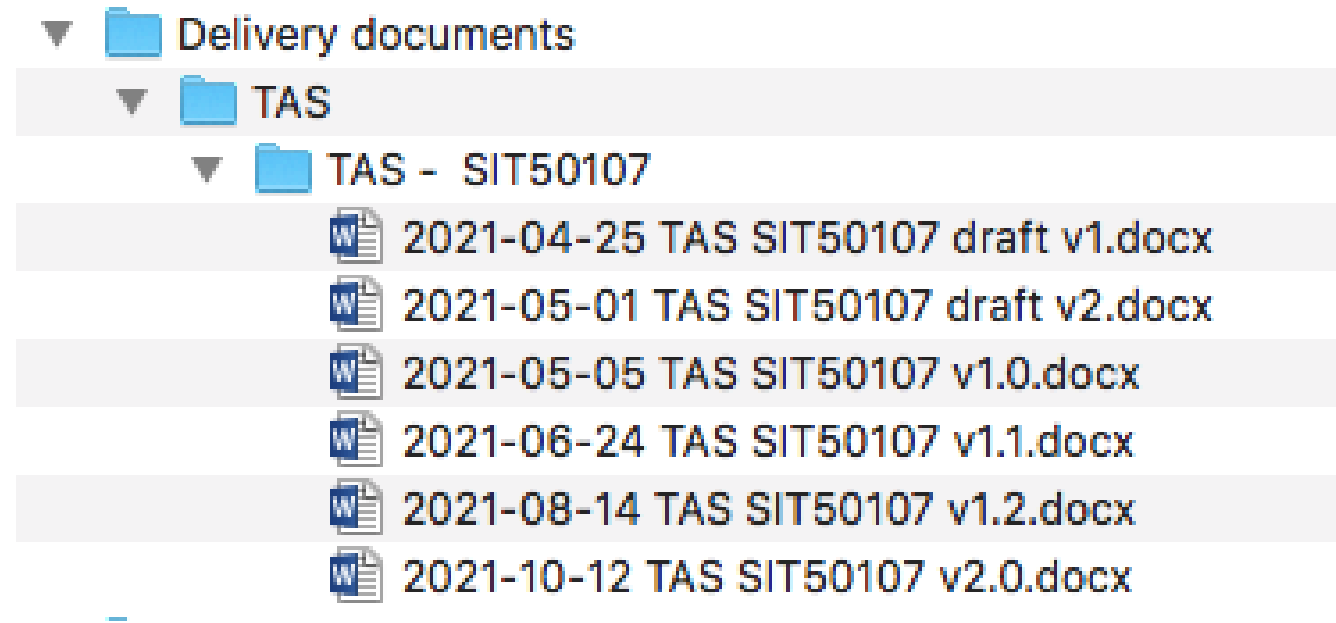


1. No structure and no way to know which is the current document
2. Documents copied can't be identified by filename
3. Excessively long file path

[consult dg]

GOOD RECORD-KEEPING PRACTICE

The same documents, using a structured convention:



1. Easy to see which is the current document
2. Each level of naming contains all relevant information
3. File path is as short as possible

[consult dg]

RETAINING EVIDENCE IN E-MAIL

- Evidence of activities (and other important information) is often contained in a trail of e-mails
- Generally, these records are stored in an individual's mailbox. If that person leaves the organisation, the information is often lost
- When managing digital records, ALL records should be part of a document management system and stored where they can be readily accessed in the future
- You wouldn't just throw important letters in your drawer – e-mail is no different and should be filed appropriately

[consult dg]

USING A SMS

- All RTOs are required to have a student management system and many of these have a range of functions that are not used
- Some functions that are commonly not used include:
 - Managing policies, procedures and templates to ensure only the current version is available to staff
 - Managing Quality Indicator and other surveys, including distribution of surveys and collation of results
 - Managing compliance activities and generating reports on quality improvement tasks resulting from activities such as internal audits

Talk to your SMS vendor about what capabilities exist in your system that you are not currently using!

[consult dg]

WHAT WE COVERED

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[consult dg]

ABOUT [CONSULT DG]

A boutique consulting business, located on the Gold Coast, providing a range of consultancy, advice, development and research services to the vocational education and training sector throughout Australia

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COMING UP **NEXT:**

3.10 - 4.10PM



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MANAGEMENT

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and the Future
of the RTO**

Peter Doukas OAM

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**Online Delivery for
English Language
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