

# POLICY # 11

## RECORDS MANAGEMENT

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**INTERACTION**

# **Records Management, Privacy and Data Security Policy and Procedure**

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**STANDARD OPERATING PROCEDURE (SOP)**

**RELEVANT INTERNAL FORMS**

# Records Management, Privacy and Data Security Policy and Procedure

## 1. The purpose of this policy

The Record Management Policy of Interaction RTO outlines the requirements and procedures for the management and retention of records in compliance with the 2015 RTO Standards and other applicable legislation. This policy aims to ensure that accurate, complete, and accessible records are maintained to support the delivery of quality vocational education (and non-vocational) capability development training programs, and to meet regulatory and contractual obligations.

The purpose of the Record Management Policy is to:

- Establish guidelines for the creation, capture, management, maintenance, retention and disposal of records and encompasses all records generated, received, and maintained by Interaction in the course of its operations, regardless of format or medium, to ensure compliance with the 2015 RTO Standards.
- Enable efficient retrieval and retrieval of records for operational, regulatory, and contractual purposes while safeguarding the integrity, confidentiality, and accessibility of records and the privacy of information that all students and clients.

'Record' is defined, for this policy as information or data in any format (physical or electronic) that is created, received, maintained, or disposed of by Interaction vocational education (and non-vocational) during the conduct of its business.

## 2. Policy principles

This policy is built on the following principles:

**Compliance:** Records shall be managed in accordance with the ASQA Standards for Registered Training Organisations 2015, as well as other relevant legislations and industry best practices, particularly Clauses 1.2, 1.5, and 1.6 that stipulate that the RTO must have an effective system for collecting, storing, and providing access to accurate and complete records.

**Accessibility:** Records shall be organised, indexed, and stored in a manner that ensures their timely retrieval and accessibility to authorised personnel.

**Accuracy and Integrity:** Records shall be accurate, complete, and maintained in a manner that prevents unauthorised alteration, damage, or loss. Regular auditing will ensure that records are being kept in accordance with this policy. Any identified non-

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compliance or deficiencies will be addressed promptly through corrective actions and process improvements.

**Retention and Disposal:** Records shall be retained for the required retention periods as specified by ASQA and other relevant legislation, with particular reference to Clause 1.8: 'The RTO must maintain records of all completed student assessments, including evidence of competency' and Clause 1.10: 'The RTO must retain records of students' participation, progress, and achievements for at least 30 years'. When records are due for disposal, they shall be securely and permanently destroyed.

## 2. Record Management Procedures

### **Record Creation and Capture**

- Interaction RTO will establish procedures for the timely creation and capture of records in accordance with regulatory and contractual requirements.
- Records will be accurately and comprehensively documented to ensure their reliability and usability for operational and reporting purposes.

### **Record Maintenance and Retention**

- Records will be stored securely to prevent loss, damage, or unauthorised access.
- Currently the records are stored on the Interaction in a securely locked facility.
- Interaction will establish a record retention schedule that outlines the minimum retention periods for different types of records based on regulatory and contractual requirements.
- The retention schedule will consider any specific legal or industry requirements applicable to certain record types.
- Records will be retained for the specified retention period and disposed of securely and confidentially once the retention period has expired.

### **Record Accessibility and Retrieval**

- Procedures will be established to facilitate the efficient retrieval of records as needed for operational, regulatory, and contractual purposes.
- Access to records will be controlled and restricted to authorised personnel to ensure confidentiality and compliance with privacy laws.
- Records will be indexed, organised, and stored in a manner that enables easy and timely retrieval.

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### **Record Security and Confidentiality**

- Measures will be implemented to safeguard the security and confidentiality of records.
- Access controls, encryption, backup procedures, and physical security measures will be employed to protect records from unauthorized access, loss, or damage.
- Access to records shall be restricted to authorised personnel based on their roles and responsibilities. Adequate security measures shall be implemented to protect records from unauthorised access, theft, loss, or damage.

### **Record Disposal**

Records that have reached their retention period shall be securely and permanently disposed of through appropriate methods, such as shredding, erasure, or incineration. Disposal shall be conducted in compliance with relevant privacy and data protection regulations.

## **3. Privacy**

Interaction RTO recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. This approach reflects the privacy values embedded in the Privacy Act 1988 (Cth).

Interaction has adopted the following principles contained as minimum standards in relation to handling personal information and will, at all times adhere to the following.

- Collect only information which the organisation requires for its primary functions.
- Ensure that stakeholders and clients are informed as to why we collect the information and how we administer the information gathered.
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent or as required by law
- Store personal information securely, protecting it from unauthorised access.
- Provide stakeholders and clients with access to their own information, and the right to seek its correction in compliance with the *Freedom of Information Act 1982*.

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## STANDARD OPERATING PROCEDURES (SOP)

### Procedures

- As outlined in relation to clauses 1.8 to 1.12 of the VET standards, we securely retain all completed assessment items relating to each unit or module for six months from the date the decision on competence for the individual unit or module was made.
- Completed assessment items, such as assignments, should not be handed back to students until the six-month period has expired, though they may be provided with a copy.
- Records of certificates issued should be kept electronically for 30 years.

### Reporting

There will be quarterly internal audits. These audits will review all the items under Policies #4 ('Internal Audit Procedures' and #5 ('Quality Control and Continuous Improvement') using the form listed below as well as, for this specific policy, enrolment and credentialling with specific reference to records management.

### Relevant Internal forms

There is no specific internal form linked to this policy; however, the 'ASQA Self-Assessment Tool' will form our guiding document and be saved on Sharepoint in the relevant folder under 'Management and Governance'.

<https://www.asqa.gov.au/rto/users-guide-standards-rto-2015/self-assessment-tool>

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