

Policy

Tracmin Pty Ltd (trading as Tracmin) will implement and monitor a systematic approach to the management of both electronic and paper-based records in accordance with the regulator and state-based funding requirements, and in alignment with the Standards for RTOs 2025. TRACMIN is committed to controlling all documentation created within the organisation to ensure consistency, security, and regulatory compliance.

Objective

TRACMIN defines all administrative record management processes and responsibilities, including document control practices, as determined by TAC, state funding contracts, legislative, and operational requirements. This ensures integrity, accuracy, security, and currency of all records for their full life cycle.

Staff Responsible

This applies to all staff:

- CEO
- Trainers and Assessors
- Administration Staff
- Operations Manager
- Compliance Team

Compliance Standards

This policy relates to the Standards for RTOs 2025 and state-specific funding and regulatory requirements.

Related Policies/Templates/Documents

- P-001.4 Enrolment Policy and Procedure
- P-006.4 Complaints and Appeals Policy and Procedure
- P-028.4 Advertising and Marketing Policy and Procedure
- P-033.4 Fees, Charges and Refunds Policy and Procedure
- P-039.4 Privacy & Personal Information Policy
- P-043.4 Issuing AQF Certification Documentation Policy
- P-051.4 Validation Policy and Procedure
- P-052.4 Cancellation, Withdrawal and Transfer Policy
- P-054.4 Governance Policy
- P-057.4 Training and Assessment Policy and Procedure

Definitions

Assessment refers to the process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard expected in the workplace, as expressed by the relevant endorsed industry/enterprise competency standards of a training package or by the learning outcomes of an accredited course.

(Source: <https://www.asqa.gov.au/resources/general-directions/retention-requirements-completed-student-assessment-items>)

Assessment tools include the following components—context and conditions of assessment, tasks to be administered to the student, an outline of the evidence to be gathered from the candidate and evidence criteria used to judge the quality of performance (i.e. the assessment decision-making rules). This term also takes in the administration, recording and reporting requirements, and may address a cluster of competencies as applicable for holistic assessment.

(Source: <https://www.asqa.gov.au/resources/general-directions/retention-requirements-completed-student-assessment-items>)

Completed student assessment items refers to the actual piece(s) of work completed by a student or evidence of that work, including evidence collected for an RPL process. An assessor's completed marking guide, criteria, and observation checklist for each student may be sufficient where it is not possible to retain the student's actual work. However, the retained evidence must have enough detail to demonstrate the assessor's judgement of the student's performance against the standard required.

(Source: <https://www.asqa.gov.au/resources/general-directions/retention-requirements-completed-student-assessment-items>)

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

(Source: <https://www.asqa.gov.au/standards/appendices/glossary>)

Record means a document, or an object, in any form (including any electronic form) that is or has been kept by reason of:

- Any information or matter that it contains or that can be obtained from it; or
- Its connection with any event, person, circumstance or thing.

(Source: The Archives Act 1983)

RPL refers to recognition of prior learning.

(Source: <https://www.asqa.gov.au/resources/general-directions/retention-requirements-completed-student-assessment-items>)

RTO refers to ASQA or TAC registered training organisation.

(Source: <https://www.asqa.gov.au/resources/general-directions/retention-requirements-completed-student-assessment-items>)

Securely retained records mean to retain records in a manner that safeguards them against unauthorised access, fire, flood, termites or any other pests, and which ensure that copies of records can be produced if the originals are destroyed or inaccessible. Records may be in hard copy or electronic format.

(Source: <https://www.asqa.gov.au/resources/general-directions/retention-requirements-completed-student-assessment-items>)

Student Identifier has the meaning given in the Student Identifiers Act 2014.

(Source: <https://www.asqa.gov.au/standards/appendices/glossary>)

1. Records Management

- TRACMIN is responsible for the collect, storage, maintenance, disposal, and retention of all paper-based and electronic records.
- TRACMIN only collects records that it is required to do as determined by the regulator and any state-based funding contract. TRACMIN will consider the following when collecting and keeping records:
 - What should I keep?
 - How long should I keep it?
 - How will I keep it (paper-based or electronic)?
 - Who is responsible for the record?
 - Who can access the record?
 - How should I destroy or de-identify the record?
 - How will I monitor that the record management system is working?
- TRACMIN will maintain records in accordance with the student life cycle which includes:
 - Pre-enrolment and informed decision-making
 - Enrolment and induction
 - Training and Assessment
 - Monitoring and support
 - Completion and continuous improvement
- From 1 July 2025, ASQA requires that TRACMIN will ensure that it securely retains, and is able to produce at audit, all completed student assessment items for each student for a period of **TWO (2)** years from the date on which the judgement of competence for the student was made.

WA ONLY:

- a) The Service Provider must store and ensure the security of all relevant records held in its custody. The Service Provider must keep accurate, complete and current records relating to the Contract including:
- (i) The type of Training Services, including separate tasks, supplied to the Corporation during the Term.
 - (ii) The time that the Service Provider spent providing the Training Services during the Term.
- b) The name and title of all Associates who provided the Training Services or were responsible for supervising the provision of the Training Services.
- c) The Service Provider must comply with the directions of the Corporation in relation to the keeping of Records whether those directions relate to the period before or after the expiry of the Term.
- d) Records must be able to substantiate that Training Services and outcomes claimed for payment have been delivered whilst meeting all contractual obligations.
- e) The Service Provider must keep all financial, enrolment, participation and assessment records related to the Contract in a way that will enable them to be conveniently inspected by the Corporation.
- f) The Service Provider shall keep accounting records that allow income and expenditure related to the Contract to be identified separately, that is, by each separate line item.
- g) The Service Provider must do everything necessary to obtain any third party's consent which is required to enable the Corporation to have access to Records under this clause 13.
- h) If the Corporation requests from the Service Provider information or documentation (or access to documentation) which is in any way relevant to the Contract (including its performance or non-performance), the Service Provider must promptly comply with such request, ensuring that the information and documentation is provided (or to which access is provided) is in all respects true and correct, up-to date, complete and in no way misleading or deceptive.
- i) This clause 13 survives the End by five (5) years.

(Source: Purchase of Training Services - General Provisions (Conditions of Contract) | June 2022 (Version 1.0))

2. Storage & Retention of Records

- TRACMIN will take all reasonable steps to protect and safely store all records in a central and secure location and ensure that:
 - Records are stored in conditions suitable for the length of time they must be held.
 - Electronic records are maintained using CAP (Central ASG Platform) – Online Enrolment System, TRACMIN's student management system (SMS) and document management system (Novacore)
 - The any regulated/licencing record retention requirements are met.
 - Storage of government funded records must adhere to the requirements of the government funded contract/agreement.
 - All records are kept in a manner that ensures the privacy of any personal and sensitive information.
- TRACMIN will ensure that all records are saved in the student management system (aXcelerate) which is a Cloud based program.
- TRACMIN does not allow any records to be stored in any staff members email account and will schedule regular purging of all deleted emails.
- TRACMIN will retain registers of AQF qualifications they are authorised to issue and of all AQF qualifications issued.

- TRACMIN will retain records of AQF certification documentation issued for a period of **THIRTY (30)** years.
- TRACMIN will provide reports of records of qualifications issued to its VET regulator on a regular basis as determined by the VET regulator.
- TRACMIN will retain sufficient data to be able to reissue a qualification or statement of attainment during a **THIRTY (30)** year period.
- TRACMIN will securely maintain records of all complaints and appeals and their outcomes.

WA ONLY:

Clause 1.10 Evidence of Participation

- a) upon the corporations' request, the service provider must provide evidence of participation to prove a student's participation in any unit of competency (UoC) for which funding has been claimed.
- b) The service provider must retain both evidence of commencement and evidence of final assessment in any UoC for which funding has been claimed, for a period of **FIVE (5)** years after the end.
- c) The evidence of student participation retained by the service provider must align to the delivery mode reported through the corporations online reporting system.
- d) Proof of student participation must meet the standards contained in Appendix A of the contract.

(Source: Purchase of Training Services - Business Rules | June 2022 (Version 1.4))

3. Access to Records

- TRACMIN will ensure that students have access to their records that TRACMIN has collected from them upon request.
- Any student or third-party requesting records held by TRACMIN will be required to complete a **F-316.4 Student Information Release Form** that **MUST** be signed by the student to allow the information to be released.

4. Monitoring, Review & Version Control of Records

- All record management and maintenance systems and practices are monitored by the Compliance Team as part of their quality assurance process.
- The Compliance Team will conduct an internal records audit to ensure compliance is being maintained and for continuous improvement opportunities.

5. Transfer of Records

- If for any reason TRACMIN ceases training and assessment operations the relevant regulator must be contacted and make arrangements to transfer all student records.

Procedure		
1. Student Records		
Action / Task	Responsible	Timeline
1.1 All students enrolled must have either retain a paper-based copy and/or electronic file which forms the Student Record. As a minimum each student record must include the following completed documents as applicable: - Student Application Form (F-005.4) - Suitability Discussion Form (F-305.4) - Photo identification - Statement of fees (F-048.4) - Invoice (if applicable) - Online LLN Report - Health Practitioner Form (if applicable) (F-932.4) - Assessments - Cancellation Form (if applicable) (F-105.4) - Completion Form (if applicable) (F-105.4) - Copy of Statement of Attainment/Certification/Testamurs and record of results - Course Credit Application Form (if applicable) (F-315.4) - Financials such as payments and refunds (if applicable) - Any state specific required records as part of the state funding contract requirements. - Any further notes of information about the student including disciplinary matters.	Administration Staff Operations Manager	During enrolment
1.2. The student record (paper and electronic) is to be maintained by the Administration Staff and they must: - Ensure all student files (including enrolment information, suitability discussion information, assessments, assessment summary reports, attendance records, are stored in a secure area during enrolment and the student's life cycle.) - Ensure any form of Student ID or proof of funding eligibility – including but not limited to for example: License, Passport, Health Care Card, or Medicare Card provided that has an expiry date must be uploaded to the Student Management System with the expiry date set. - ID or proof of funding eligibility must be current at time of enrolment/commencement and/or where state funding contract requires it to be current. - Undertake ongoing quality checks to ensure all records and completed accurately and are included in the file during the student life cycle.	Administration Staff	Ongoing

Action / Task	Responsible	Timeline
- Complete F-115.4 Student File Audit Checklist during the following: - At Compliance request as part of the Internal Audit Monitoring - Before any SOA or Certificate is produced - Before a student is completed and/or cancelled - As part of the administration process, before closing a file and archiving. - Complete training records must be retained onsite for a minimum of three (3) months in case the file needs to be recalled refer to: 4. Period of Retention Procedure.		
1.4 Accessing personal records is permitted following the steps outlined below: - Students enquire to access their file and complete an F-316.4 Student Information Release form and provide photo ID. - Administration receives the request for processing and to leave a contact note and upload into the SMS, including photo ID. - Where records are to be mailed, they will only be mailed to the address that is held on file unless alternate change of address information is provided in writing and TRACMIN Admin makes the correction to the student file. - Once approved, Administration must arrange for provision of records via mail, email or providing time to view and photocopy (fees for photocopying apply) Further information please refer to P-039.4 Privacy and Personal Information Policy and Procedure.	Students Administration Staff	On request
1.4 Archiving student records must be completed within 3 months of completion, or at the discretion of the Operations manager if longer timeframe required by following the process outlined below: - Student File audit checklist to be completed. - The box number to be recorded electronically on the SMS prior to closing the file. - Student files are archived into a numbered box. - Attribute report to be printed. - Attribute report to be included on the inside of the archive box lid. - Cross check that everyone is in the box prior to closing the lid. Attribute number, commencement date, qualification, student name, organization is recorded on TRACMIN's archive register	Administration Staff & Operations Manager	At the end of the student life cycle

2. Individual Responsibilities for Recording		
2.1. TRACMIN CEO is responsible for ensuring all financial and business-related records are maintained which includes although not limited to: - Financials including forecasts, budgets, annual reports. - Strategic and business plans. - Business registration records - Information on Financial Viability Risk Assessment Requirements - Public liability insurance - Minutes of meetings and/or other forms of evidence relating to governance and business operations.	RTO CEO	Ongoing
2.1 The State and Operations Managers are responsible for ensuring all records which relate to training and assessment activities are stored, maintained, and archived including: - Student files - Training and assessment strategies, resources and other materials required to conduct training and assessment. - Staff records including professional development and credentials. - Evidence of TRACMIN SMS - Client records - AVETMISS Data - Outcomes of training and assessment - Appeals - Complaints - Funding arrangements - Supplier information - Marketing materials - Financials - Payments and refund information	State Manager Operations Manager	Ongoing
2.2. The National Quality and Compliance Department are responsible for storage, maintaining and archiving all required records to ensure compliance against the Standards for RTOs 2025.	NCQD	Ongoing

4. Periods of Retention

The table provided outlines TRACMIN retention periods required for the different types of records:

Note: This procedure should be read in conjunction with TRACMIN State funding contract.

Type of Record	Required For	Period of Retention
Completed assessments (hard copy or electronic)	TAC – For training delivered/assessed on or after 1 July 2025	Two (2) years from the date the student completed the training product.
	TAC – For training delivered/assessed prior to 1 July 2025	Six (6) months from the date the student completed the training product.
	WA Funding	5 years
Participation and progression of training for students in funding contracts	WA Funding	5 years
Participation and progression of on-the-job training for students in funding contracts	WA Funding	5 years
Student enrolment, eligibility and AVETMISS Data	WA Funding	5 years
Trainer files	WA Funding	5 years
Audit records	TAC	Seven (7) years
RTO management records (all versions)	TAC	Seven (7) years
Administration documents, form, policies, and procedures including Retired / Obsolete	TAC	Seven (7) years
Assessment resources / templates	TAC	5 years
	WA Funding	5 years
AQF Certification	TAC	30 years
	WA Funding	5 years
Student files	TAC	Onsite in hard copy for a period of three (3) months in case the file needs to be retained.
Student financials	TAC	7 years
Evidence of contribution fees paid	WA Funding	5 years
Complaints and/or appeals	TAC	7 years
Staff records	TAC	7 years from the time employment with TRACMIN is ceased.

5. Monitoring, Review & Version Control of Records		
All records, including storage of retired and/or obsolete documents are maintained electronically through TRACMIN Compliance Management System (CMS) – Novacore. The Compliance Team are responsible for the management of this system.	CQD	Once approved by NCQM
Identification of newly created documents - The identification of new documentation required to assist in the operation of TRACMIN must be consulted with senior management to determine the appropriateness from an operational perspective and necessary compliance requirements. - Approval will be obtained prior to implementation by Compliance Team. Effective Date and Review Date of Controlled documents - All controlled documents will specify an effective date and a scheduled review date. The Compliance Team will determine the applicable duration and review frequency at the time of creation, based on the document's purpose, relevance, and regulatory requirements. The Compliance Team may adjust review timelines as needed to ensure documents remain current and fit for purpose. Policies and procedures creation/review - Each policy and procedure must be developed using the latest RTO template to maintain consistency in style, format, and document control properties. - Policies and procedures are developed and approved by the Compliance Team. All new or reviewed policies and procedures, forms, manuals, TASs, brochures, curriculum materials, or other controlled documents will be communicated via email to all Training Staff. It is the responsibility of the receiver to communicate all changes to members of staff who will be impacted by the change. Controlled document identification Each controlled document created is required to display the following properties as a standard identifier control measure: - All RTO documents will maintain their own version control identifier. - In the footer as part of the version control process: version control date, approval date, review date and page number. Policies and procedures - All RTO policies and procedures will be identified with a document name, and a unique prefix and number such as P-XXX - All existing policies and procedures will include a document revision history identifier outlining the changes made, by whom, when published including the version number. - All policies and procedure will maintain a version control identifier in the footer of the document.		

Training and Assessment Strategies ▪ All approved TAS documents are allocated a TAS ID number and registered on the TAS Register maintained by Compliance. ▪ TAS documents are to be created by Compliance only. Course Brochures ▪ All course brochures are to be controlled by allocating a brochure code and registered on the Brochure Register maintained by Marketing Manager & Compliance Team. At no time are brochures or other forms of marketing material to be developed by the individual RTO. Refer to P-028.4 Advertising and Marketing Policy and Procedure. Assessment Tools ▪ All assessment tools are to include a version control number, date published and review date within the footer of the document. All current versions will be uploaded into Novacore and be made available to access in Sharepoint. At no time should assessment resources be developed and/or modified by TRACMINs. ▪ Refer to P- 057.4 Training and Assessment Policy and Procedure. General RTO Forms ▪ All RTO forms will be identified with a document name, and a unique prefix and number such as F-XXX. ▪ All forms will contain a version control measure located in the document footer including the version control number, published date and review date. ▪ All current versions are uploaded into Novacore and be made available for access in Sharepoint. At no time should a form be produced for operational purposes without approval from Compliance. Documents and manuals ▪ Templates, information sheets and manuals are identified with a unique prefix, number, and name for example: M-XXX for manual, D-XXX for documents ▪ All documents will contain a version control measure located in the document footer including the version control number, published date and review date. ▪ All current versions are uploaded into Novacore and are made available for access in Sharepoint. ▪ At no time should a form be produced for operational purposes without approval from Compliance Team.		
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Testamurs, Records of Results and Statements of Attainment - All AQF documentation is provided with a certification number, date of award, and date of issuance. - All Testamurs, Records of Results, and Statements of Attainment must be created using the templates built into the Student Management System (SMS). Maintaining Version Control - Novacore is used to store, manage, and review all versions of all controlled documents. - When updating a controlled document, the version number of the document will automatically be updated. - If the changes made are a Major Change (i.e. a complete re-write of the document or a significant change to a process or document), the version will increase to the next whole number (e.g. from Version 1.2 to Version 2.0) - If the changes made are a Minor Change (i.e. correcting a typing error, adding new fields to a form, etc.) the version will increase by .1 (e.g. from Version 1.2 to Version 1.4) Whenever updating a Controlled Document, revision notes are to be left indicating what changes are being made. Dates of changes made are automatically footprinted. Maintenance of Retired and/or Obsolete Documents - Storage of retired and/or obsolete documents is maintained electronically through TRACMIN CMS – Novacore. - Each document is archived under its relevant folder. Note that historical versions can be retrieved if required.		
6. Transfer of Records		
- In the event TRACMIN ceases operations for any reason the Regulator must be notified electronically providing the regulator: - Student records within 30 days of the day the withdrawal takes effect.	CEO and NCQM	During withdrawal

Document Revision History

Version Number	Author	Date Published	Description
3.0	Pippa Price	05 August 2020	Created for specific RTO from original policy P-003 (V3.0).
3.1	Fiona Dunkerton	December 2021	Minor updates to content & formatting
3.2	Fiona Dunkerton	October 2022	Scheduled review; minor updates to content & formatting
4.0	Rebekah Faleafaga	Oct 2025	Updated as per current requirements.
3.4	Fiona Dunkerton	Sept 2024	Scheduled review; cosmetic updates only.
4.0	Rebekah Faleafaga	Oct 2025	Rehauled. Superseded P-140.4 Controlled Docs P&P and merged into P-003 as a section. Transition to NVR SRTO Standards 2025.