

Data and Records Management Policy

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Responsible Officer	RTO Manager		
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Related Documents	<i>BTS Privacy Policy</i> <i>NCVER Privacy Notice</i> <i>Complaints and Appeals Policy</i> <i>Student Records Request Form</i> <i>Student Information Release Form</i>		
Version	Authorised by	Approved	Effective Date
1.0	Chief Executive Officer	17/06/2025	23/06/2025

1. Context

This Policy outlines Barrington Training Services (BTS)'s approach to managing data and records to ensure compliance with the Standards for RTOs and the VET Quality Framework. It supports the integrity, accuracy, and security of all training and operational records.

It also details BTS's procedures for the collection, storage, and disposal of student records, including the systems and safeguards in place to maintain their accuracy and confidentiality. Additionally, the policy defines the principles, roles, and responsibilities that guide effective recordkeeping practices across the RTO.

2. Definitions

Refer to the *Explanation of Terms* document.

3. Scope

This Policy applies to all BTS staff, contractors, and third-party providers involved in the creation, management, storage, and disposal of records related to training delivery, student outcomes, and RTO operations.

4. Principles

BTS's approach to data and records management is guided by the following principles:

- **Compliance.** All records are created, managed, maintained and disposed of in accordance with legislative and regulatory requirements, policies and recognised standards of best practice.

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- **Integrity.** Records must be accurate, complete, and protected from unauthorised access, alteration, deletion or misuse.
- **Accountability.** Levels of responsibility are established regarding recordkeeping as relevant to all functions, processes, activities and transactions.
- **Retention.** Records will be retained for the minimum periods required by legislation and regulatory bodies.
- **Confidentiality.** Personal and sensitive information will be handled in accordance with the Privacy Act 1988 (Cth) and the BTS Privacy Policy.
- **Accessibility.** Records must be readily retrievable for audit, review, and student access.

5. Policy details

BTS is committed to maintaining accurate, secure, and accessible records that demonstrate compliance with legislative and regulatory requirements and support quality training outcomes. This includes ensuring the security, accuracy, and confidentiality of student information at all times.

Effective management of student records is essential to:

- Protect the rights of current and former students,
- Support the delivery of consistent and equitable services, and
- Fulfil BTS's legal and operational obligations.

All student data is managed in accordance with the **BTS Privacy Policy**, which should be read in conjunction with this policy. Personal information will not be disclosed to third parties without the student's written consent, unless required by law or as outlined in the **BTS Privacy Policy** and the **NCVER Privacy Notice**.

5.1. Creation of records

- a) All BTS staff are expected to create and maintain clear, complete, and accurate records related to BTS's operations and any activities for which they are directly responsible. This includes, but is not limited to, managing student records and training and assessment-related records, documenting meetings, conversations, interviews, and decisions made.
- b) Records must be entered into the appropriate recordkeeping systems when they are created or received.
- c) Where feasible, records are created and stored in electronic format to ensure accessibility and efficiency.
- d) To ensure consistency and accuracy across systems, the BTS Team adhere to an approved **naming convention** for all business and student records. Naming conventions

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are set by the responsible manager (or agreed between managers where cross-functional) and communicated in writing to staff members responsible for creating records.

- e) All records created by BTS staff members in performing their duties are BTS property and should be clearly identifiable as such.
- f) Some records may require the inclusion of additional information for identifying different iterations or versions of a record. Staff will include and update the following information as applicable in the body of the document: Document owner/custodian, Last update, Version number.

5.2. Records management systems and storage

- a) BTS will manage all records in accordance with the **Record Retention Matrix** outlined in **Appendix 1** of this Policy.
- b) BTS utilises a secure **Learning Management System (LMS)** that complies with the reporting and data retention requirements of the Standards for RTOs. This system stores student records, including enrolment applications, forms, ID documents, and relevant supporting documentation, and it is maintained by an external service provider, who is responsible for regular data backups and ensuring the availability of student records as required by regulatory authorities.
- c) All learning resources, assessment materials, student submissions, results, and trainer feedback are securely stored within BTS's Learning Management System (LMS).
- d) Sensitive physical records, such as student and staff files, are stored in secure, access-controlled areas within the Head Office and relevant campus administration offices. Access to these records is restricted to authorised personnel only.
- e) For electronically stored records—whether within the LMS or other platforms—access is controlled through secure login credentials (username and password) and is limited to staff based on their roles and responsibilities.
- f) In addition to the SMS, BTS uses platforms such as JotForm and Microsoft 365 for specific administrative and operational functions. All other electronic records and databases are hosted on BTS's internal IT servers, with regular backups managed by the BTS Tech Support to ensure data integrity and disaster recovery readiness.
- g) Records and information management requirements are assessed and identified during system acquisition or development, with evidence retained of this assessment.
- h) Records and information management requirements are identified and assessed when entering into cloud or similar service arrangements.

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5.3. Access to students and staff records

BTS ensures that all records relating to students and staff are treated as confidential and are only accessible to authorised personnel whose roles require such access.

a) Access requests

- Students may request access to their personal records by submitting a written request to the BTS Team, using the **Student Records Request Form**, available on the Student Information page of the BTS website.
- Staff may request access to their personnel records by submitting a written request to Human Resources.

Upon receiving a request:

- The relevant administrative team will prepare the file and arrange a suitable date and time for the individual to view their records.
- No original documents may be removed from the file.
- If copies of specific documents are requested, BTS may, at its discretion, provide photocopies. These will be processed and delivered within five (5) working days.

b) Correction and disputes

- Individuals have the right to request corrections to factual inaccuracies (e.g., name, address, date of birth).
- If there is disagreement with the content of a record, the individual may:
 - i. Request an amendment (for factual errors), or
 - ii. Lodge a formal complaint. The matter will be reviewed, and a determination will be made in accordance with the **Complaints and Appeals Policy**.

c) Confidential information

Before access is granted, any information deemed confidential—such as notes from private counselling or support sessions—will be removed from the file to protect the privacy of all parties involved.

5.4. Access to academic progress records

- a) Students at BTS have the right to access their academic records to verify that their progress has been accurately recorded and reported.
- b) BTS maintains all academic data in the Learning Management System (LMS) as well as in BTS's internal IT servers.

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- c) Students can access their current academic results directly through the LMS student portal, which provides real-time visibility of their progress and assessment outcomes.
- d) If a student requires a formal academic progress report or has questions regarding their academic records, they must submit a written request using the **Student Records Request Form**, available on the Student Information page of the BTS website. Upon receipt of the request, a report will be generated and provided within five (5) working days.

5.5. Recordkeeping

- a) Student records requiring long-term or permanent retention are identified and managed appropriately. When no longer active, these records are securely transferred to the BTS archives.
- b) Electronic copies of all testamurs, records of results, academic transcripts, and statements of attainment are securely stored in each student's file.
- c) Recordkeeping requirements are considered in the development or acquisition of all BTS business systems. Special attention is given to outsourced, cloud-based, or third-party service arrangements, including the secure management of records during system transitions or data migrations.
- d) Backup systems are in place to ensure that copies can be retrieved if original records are lost, damaged, or inaccessible.

5.6. Disposal of records

- a) Business and student records are disposed of in accordance with applicable legislation, BTS policies, and recognised best practice standards.
- b) Electronic and physical records must not be disposed of without first undergoing a formal appraisal process and receiving approval from the designated authority. All record destruction activities must be properly documented, ensuring compliance with legislative and organisational requirements.
- c) The Chief Executive Officer and the members of the BTS Management Team only have the authority to dispose of BTS records.
- d) Disposal of certain records may need to be recorded, e.g. records of results, students' submitted assessments, student administration records, or financial records.

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6. Breaches

If a staff member is found to be in breach of this Policy, she or he may be subject to disciplinary action in accordance with the relevant Code of Conduct and Misconduct Procedure.

7. Appeals

Appeals concerning any decision taken in relation to this Policy should be made under the relevant Complaints and Appeals Policy, which can be accessed from the BTS website.

Document History:

Version	Date	Author	Reason	Sections
0.1	13/06/2025	Ivan Negro	Document Creation	All
1.0	17/06/2025	Allen Barry	CEO Approval	All

This document is UNCONTROLLED once printed.

Appendix 1 – Records Retention Matrix

Student records

Record	Description	Responsibility	Location	Minimum Retention
Student administration records	Enrolment application forms, USI, ID documents	Admin Team RTO Coordinator	LMS, Microsoft 365, and internal IT servers	30 Years
Student contact details	Personal contact details, including emergency contacts and employer/supervisor if applicable	Admin Team	LMS, Microsoft 365, and internal IT servers	While the student is enrolled + 2 years
Student attendance records	Class rolls, attendance logs	Admin Team Trainers and assessors	LMS, Microsoft 365, and internal IT servers	7 years
Student traineeships records	Training contracts, Training Plan Proposals, Training Plans, Progress reports	Admin Team	LMS, Microsoft 365, and internal IT servers	7 years (or as per funding authority)
Work placement records	Work Placement Agreements, Logs, Workplace Supervisor Reports	Admin Team RTO Coordinator	LMS, Microsoft 365, and internal IT servers	7 years
Student financial records	Fee payments, refunds, and invoices	Admin Team Finance Team	LMS, Microsoft 365, and internal IT servers	7 years (ATO requirement)
Assessment and academic progress-related records	Assessment tools, submissions, results, feedback	Admin Team Trainers and Assessors RTO Coordinator	LMS, Microsoft 365, and internal IT servers	2 years after the student has completed the training product
Credit transfer and RPL records	Application, supporting evidence, outcomes	Admin Team Trainers and Assessors RTO Coordinator	LMS, Microsoft 365, and internal IT servers	30 years
AQF certification documentation issued	Testamurs, records of results, statements of attainment	Admin Team Trainers and Assessors RTO Coordinator	LMS, Microsoft 365, and internal IT servers	30 years
Complaints and appeals	Lodgement forms, investigation notes, outcomes	Admin Team Trainers and Assessors RTO Coordinator	LMS, Microsoft 365, and internal IT servers	5 years from the date the complaint or appeal was lodged

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Academic records

Record	Description	Responsibility	Location	Minimum Retention
Training and Assessment resources (LG, TG, Assessment Tasks, TAS, Unit Mappings)	All academic material, whether in the form of a qualification, training package or individual units/modules	L&D Team RTO Coordinator RTO Manager	LMS, Microsoft 365, and internal IT servers	Continuous
Validation & Moderation	All material relating to the validation and moderation of a course/qualification/unit, or module	L&D Team RTO Coordinator RTO Manager	LMS, Microsoft 365, and internal IT servers	Life of training product + 2 years
Trainer/Assessor File	CVs, qualifications, PD logs	RTO Coordinator RTO Manager	Microsoft 365 and internal IT servers	7 years after the engagement ceases
Records of Sessions / Timetables and associated information	Timetable indicating the units/modules, delivery hours, and locations	Admin Team RTO Coordinator	LMS, Microsoft 365, and internal IT servers	Continuous
Academic Meetings	Agendas & Minutes of each meeting	Meeting Chairperson	Microsoft 365 and internal IT servers	7 years

Management records

Record	Description	Responsibility	Location	Minimum Retention
Management Team meetings	Agendas & Minutes of each meeting. Quality assurance, compliance, and improvement discussion	Meeting Chairperson RTO Manager	Microsoft 365 and internal IT servers	7 years
Quality meetings				
Governance and operational records	Policies, procedures, insurance, and business, strategic, financial plans	CEO RTO Manager	Microsoft 365 and internal IT servers	7 years
Internal and External Audits	Audit reports, findings, responses	CEO RTO Manager	Microsoft 365 and internal IT servers	7 years

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AVETMISS and Quality Indicators Reports	Data submissions and annual reports	RTO Coordinator RTO Manager	Microsoft 365 and internal IT servers	7 years
Quality Assurance, Continuous improvement and Compliance	QMS, plans, logs, reviews, and improvement actions	CEO RTO Manager	Microsoft 365 and internal IT servers	7 years
Regulatory bodies' communications, updates, and shared documents	Emails, letters, updates, and shared documents from regulators	CEO RTO Manager	Microsoft 365 and internal IT servers	7 years

Staff records

Record	Description	Responsibility	Location	Retention
Academic and Administration Staff records	All records relating to recruitment, qualifications, experience, employment, payroll, appraisals and PD, and issues arising during employment	HR Department RTO Manager	Head Office, Microsoft 365 and internal IT servers	7 years after the employment ceases
Insurance claims	Work compensation	HR Department	Head Office, Microsoft 365 and internal IT servers	75 years from the employee's date of birth

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