

Records Management Policy

DRAFT FOR MANAGEMENT APPROVAL

Provider	The Bright College RTO 45752 CRICOS 03945D
Campus	Level 2, 440 William Street, Perth WA 6000
Policy version	Draft 4.0
Regulatory review	15 September 2026
Applies to	All applicable domestic and international students
Policy owner	CEO / Academic Manager
Next review	15 September 2027 or earlier if legislation, registration conditions or operations change

Regulatory framework

- National Vocational Education and Training Regulator Act 2011 (Cth).
- National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025 (effective for RTOs from 1 July 2025).
- National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025.
- Privacy Act 1988 (Cth), including the Australian Privacy Principles and Notifiable Data Breaches scheme.
- Student Identifiers Act 2014 (Cth) and current Student Identifiers regulations and requirements.

Compliance note: This draft separates and updates the Version 3.1 policy framework against the regulatory position reviewed on 15 September 2026. Applicable legislation, regulatory instruments, registration conditions and formally approved College documents take precedence if a conflict is identified. Final operational approval and implementation evidence remain the responsibility of The Bright College.

Policy and procedure

- The Bright College's Management is committed to implementing best practice in its records management practices and systems and will ensure that it will co-operate with the National VET Regulator in the retention, archiving, retrieval, and transfer of records procedures consistent with ASQA's requirements.
- The Bright College will provide returns of its client records of attainment of units of competence and qualifications to its VET Regulator on a regular basis, or as determined by the VET Regulator. The Bright College will comply with all Commonwealth requirements for the implementation of a national unique student identifier within all student records.
- The Bright College's Training Coordinator will maintain all student records on The Bright College's AVETMISS capable student records management database.

Records Management Procedures

All staff employed by The Bright College will be required to apply themselves to the following written procedures and safeguard confidential and personal information according to the Privacy Act 1988 (Commonwealth).

- The Bright College's staff will record all student fee payments and details of refunds paid.
- Upon enrolment each student's personal details shall be entered into The Bright College student database.

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- Student personal details and records shall be maintained in a current up to date condition, updating of records will be actioned following advice of changes to details from a student (**Student Change of Personal Details Form**).
- International students currently enrolled at The Bright College will have their contact details (current residential address, email, and contact phone and mobile) entered on to the **Enrolled Student Contact Form**. The list shall be reviewed by the enrolling officer every 3 months for currency and updated.
- International Students will be required to provide The Bright College with the following contact details within 7 days of any changes to their address or contact details. The information be recorded by The Bright College includes:
 - the student's current residential address, mobile number (if any) and email address (if any)
 - who to contact in emergency situations
 - any changes to those details
- The Bright College must maintain records of all Enrolment transfer requests **Application for Release Cancellation of Studies** from overseas students for Enrolment release and the assessment of, and decision regarding, the request for two years after the overseas student ceases to be an accepted student.
- The Bright College retain records of all written agreements as well as receipts of payments made by students under the written agreement for at least 2 years after the person ceases to be an accepted student.
- Student records are backed up and maintained electronically at least weekly at an offsite location (external web based)
- Only The Bright College's staff directly involved with student welfare and or student results will have access to personal student details.
- Upon request and sufficient notice, The Bright College's administrative staff shall provide a student with access to their personal student records for progress information.
- Students may request a reissuance of statements of attainment or qualifications achieved.
- All re-issuance of certification documentation by The Bright College's Management will be based on the verification and authentication of testamurs issued by The Bright College prior to reissuance. (refer to The Bright College's current fees schedule for replacement cost)
- Where a request for a replacement testamur is received from a current or past student the student's identification must be verified by The Bright College's staff with a form of documented personal I.D, such as a driver's license or birth certificate or a passport.
- The student's records of course achievement will then be accessed, and any issued testamur may be reissued in accordance with The Bright College's Qualifications Issuance Policy and current fee structure.
- Upon receipt of written consent by a student, The Bright College's staff will provide a third party with student's personal details.
- Access to student records may be provided where the relevant Standards for Registered Training Organisations or an officer of the law requires The Bright College to do so.
- The Bright College's staff will comply with all **external reporting responsibilities** at the required date to do so. (i.e., AVETMISS and Quality Indicator Reporting) including returns of its client records of attainment of units of competence and qualifications to their VET Regulator on a regular basis (as determined by the VET Regulator)
- Designated RTO staff will maintain up to date records of the employment history and qualifications of all staff employed by The Bright College.
- Designated RTO staff shall ensure that all student assessment results are maintained in an accurate manner providing for the safekeeping of all student assessment results for a term no less than 30 years and providing the CEO with at least one week's written notice before any records are destroyed.
- A register of all student qualification awards will be kept and maintained following the issuance of all qualifications and statements of attainment.
- The detail required in the register will include:
 - a) Student Given Name
 - b) Student Surname
 - c) Student Date of Birth

- d) Qualification Code
- e) Issued Date
- f) Certificate Number
- g) Language
- h) Unit Code(s)

Version Control

The Bright College's Version Control is maintained through The Bright College's Quality Management System (QMS)

Designated RTO staff shall maintain the Previously Completed Forms (PCF's) in all documents that are related to The Bright College's scope of registration and ensure that only the latest versions are issued or reissued to The Bright College's staff. Further communication of the current version of relevant documentation may be communicated utilising the **Version Control Log Form**.

Student Records (Audit records)

The following documents will be required for audit purposes and will be *securely retained for a period of 6 months from the date on which the judgement of competence was made or a qualification was awarded.

These documents will include the following:

- **Attendance records** that show the names of students, the unit/s of competency identifier and/or name,
- Date/s of attendance and signature or initial of trainer/lecturer.
- Records of assessment and/or training record books that show the date of assessment/s, unit/s of competency, student name and outcome of assessment/s.
- Training delivery and assessment policies and strategies for all qualifications/courses.
- **Completed assessment tools and instruments.
- Marking guide criteria
- Recognition of Prior Learning assessment records.
- Complaints, Appeals and the complaints resolution records

**Securely retain: To retain records in a manner that safeguards them against unauthorised access, fire, flood, termites, or any other pests, and which ensures that copies of records can be produced if the originals are destroyed or inaccessible.*

***Completed student assessment items: 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.*

** The Bright College's management will provide for other record-keeping requirements that may apply if The Bright College participates in some training and assessment activities conducted under a government-funded agreement or contract.*

Appeals Records

The Bright College's management will accept appeals against an assessment decision for a period no longer than 3 months following the competency decision. During this period, The Bright College will maintain records of all assessment decisions.

The following documents will be maintained:

- copies of students' completed assessments
- the marking guide criteria,
- training record book
- workplace evidence
- observation checklist for each student.

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Cessation of services

On cessation of services and the discontinuation of its business the CEO shall ensure that all student records are made available to its VET Regulator.

The student records must be provided to the VET Regulator if:

- The Bright College voluntarily withdraws its registration
- The Bright College's registration has lapsed
- The Bright College's registration is not renewed
- The Bright College's registration is cancelled by the VET Regulator.

The Bright College's CEO must do this within 30 days of their registration expiring, or of ceasing to operate.

Records to be forwarded to the VET Regulator will take the form of a digital copy of the records for each student who was enrolled in a course during the period of registration:

- This will not apply if a student is transferring to another provider. In this event, the provider from which the student is transferring is to provide the student's records to the new provider.

The CEO must ensure that the student records are sent in a digital form to the VET Regulator and include the following information for each student:

- family name, first name
- residential post code
- date of birth
- student ID number (if issued)
- enrolment and commencement dates
- code and title of qualification, course or program student enrolled in
- codes and titles of units of competency completed and results (if applicable)
- date the Certificate or Statement of Attainment was issued

The CEO shall ensure that the above student records are submitted to its VET Regulator within 30 days of registration expiring / ceasing operation (in accordance with the National Vocational Education and Training Regulator Act 2011)

VET Quality Framework Compliance Records

The CEO shall ensure that the following documents and records are maintained in an Audit ready condition.

- A description of the legal entity (e.g., corporation, trust, sole trader, incorporated association, partnership, or government entity)
- A current copy of Certificate of Incorporation, Articles of Association or equivalent
- A current copy of the financial viability risk assessment (Refer to the Common Indicators Information Review Checklist)
- All business name registration certificates showing registered business (trading) name(s)
- The legal entity's Australian Company Number (ACN)
- The legal entity's Australian Business Number (ABN)
- A description of the type of training organisation (for example, school, university, community-based adult education, other training provider)
- Address and contact details for:
 - a) The Bright College's head office
 - b) Principal place of business
 - c) Permanent delivery sites or campuses.
- A list of the current staff name and contact details for:
 - a) Executive officers
 - b) High managerial agents; and

- c) any person or entity which exercises a degree of control or influence over the management or direction of the registered training organisation. (Refer to the **Fit and Proper Person Requirements Checklist**)
- d) A list of the correct national code and title of the Training Package, VET qualifications, VET accredited courses, modules, or units of competency that The Bright College delivers or intends to deliver.
- Documentation that provides for the following:
 - a) training and assessment strategy for each VET qualification, VET accredited course, module and unit of competency applied for
 - b) evidence to demonstrate that each trainer and assessor has the necessary training and assessment competencies and the relevant vocational competency for each VET qualification, VET accredited course, module, and unit of competency that they deliver and assess.
 - c) evidence to demonstrate that each trainer and assessor has current industry skills directly relevant to the training/assessment being undertaken
 - d) evidence of the supervisory arrangements for trainers who do not possess the required training competencies; and
 - e) evidence of ongoing access to staff, facilities, equipment and training and assessment materials that are consistent with the requirements of the Training Package or VET accredited course and The Bright College's own training and assessment strategy.
 - f) Documentation that provides for the details of any license/regulatory outcomes of the VET qualification and VET course applied for including details of the licensing body.
 - g) Documentation that provides for advice as to whether The Bright College delivers, or intends to deliver, any training online, interstate, or by distance, and if so, in which jurisdictions.
 - h) Documentation that provides for advice as to whether or not The Bright College delivers, or intends to deliver, any training offshore (overseas).
 - i) Documentation that provides for advice as to whether or not The Bright College offers, or intends to offer, any training to international students, and if so, details of the CRICOS approval.
 - j) Documentation that provides for advice as to whether or not The Bright College intends to apply for, or already receives, Commonwealth, State or Territory government funding for training
 - k) Documentation that provides for advice as to whether or not The Bright College intends to enter into, or is in, a partnership/sub-contracting arrangement for training
 - l) Documentation that provides for advice as to whether or not The Bright College collects, or intends to collect, fees paid in advance from students for enrolment in training.
 - m) Documentation that provides for advice as to whether or not The Bright College delivers, or intends to deliver, training to students under the age of 18, and if so:
 - n) Working With Children Checks for all relevant persons; and
 - o) Policies and procedures for managing these under 18 year old students.
 - p) Documentation that provides evidence of appropriate finance and AVETMISS compliant VET student records management systems
 - q) Documentation that provides evidence of public liability insurance cover.