


# Recordkeeping requirements

This fact sheet provides an overview of Skills First recordkeeping requirements.

 <b>4 rules for records</b>	
<b>Keep records secure</b>	<b>Have good records to protect your business</b>
<b>Make records easily accessible for audit and review</b>	<b>Keep records for 3 years after the student completes or withdraws from training, and then dispose of them if you can</b>



## What's a record?

A record is any document within the meaning of the [Evidence Act 2008 \(Vic\)](#) that a training provider or staff produces or gains possession of in the course of performing its obligations under the contract.

Each record must be in enough detail for us to determine your compliance with the contract.

We've created forms and templates, such as the evidence of eligibility and student declaration form, that help you make records with sufficient detail.



## Examples of records

- Evidence to support your claim for payment, such as:
  - evidence of eligibility
  - evidence of participation
  - evidence of a student's entitlement to a concession or fee waiver
  - evidence of the pre-training review.
- Evidence that training and assessment was appropriate and of high quality.
- Information about Skills First teachers.
- Quotes, invoices and receipts to subcontractors and other third parties.
- Bank statements to confirm fee payment.



## Amending records

All records must be complete, accurate and authentic.

You must not amend records. However, if you discover a minor administrative oversight, you can make a change provided it is:

- true
- accurate
- documented in detail
- clearly explained in a straightforward way.

You must not change records just to comply with the contract or create records retrospectively.



## Easy access for audit

You must promptly provide us with easy access to a record if we ask for it.

You must help us, or anyone we authorise such as an auditor, to locate, access and view records. This includes taking copies of records and responding promptly to requests for access.

Sometimes we may ask for a missing or misplaced record within a short timeframe (for example, 24 hours after an audit). You must not use this time to create a new record or amend ones that have already been audited.

It's in your interests to keep good records. If you don't give us a record that we request within a reasonable or specified time, we could decide it doesn't exist and that the activity it would evidence didn't occur. We may exercise our contractual rights on this basis.

We may also ask you to retain further records if we think they're necessary to show your compliance with the contract.



## Keep records for 3 years

You must keep a record for 3 years after the student completes or withdraws from their program. For example, if a student completed training on 30 June 2022, records related to their training can't be destroyed until 30 June 2025.

But sometimes we may ask you to keep a record for longer.

Also, we can ask you to start keeping a record you are not currently keeping, if we think this is necessary.



## Dispose of records when no longer needed

You must have a process to promptly and securely dispose of records that include personal information if they are no longer needed for any purpose. This is a requirement of the Privacy and Data Protection Act.

Personal information includes any information that identifies the student.

This is particularly important for sensitive information, like government issued documents you retain as evidence of eligibility.

Before disposing of records check whether you still need to keep them for regulatory or other legal reasons.



## Keep records secure

You must have a secure recordkeeping system for both hard copy and electronic records that clearly shows your contract compliance and supports your claims for payment.

Your recordkeeping system must securely protect the records from theft, loss, damage and unauthorised access, use and amendments.

You should have policies to help you prepare for and recover from significant business disruptions.



## Protect student privacy

Protecting your students' personal information and complying with the [information privacy principles](#) is an important obligation you must meet.

### Privacy notice

Make sure your students know about the ways their personal information will be collected and handled when they enrol.

Do this through the Victorian government VET student enrolment privacy notice and your own student enrolment privacy notice. Look in the [Victorian VET student statistical collection guidelines](#) for more information.

## Student privacy concernse

If a student raises a privacy concern with you about retaining their evidence of eligibility, make all reasonable attempts to reassure them of your privacy protection measures.

If the student is still concerned, you can instead retain a declaration that you've sighted the evidence.

Include the name of the authorised delegate, the date they sighted the evidence, the student's name, and the type of evidence sighted in the declaration. Attach it to the student's file.

## Don't retain Centrelink Customer Reference Numbers (CRN)

The CRN is a particularly sensitive form of personal information. It can't be changed if it is subject to a security breach, unlike other forms of identity evidence where a new card or document number can be issued.

Don't keep a copy of the CRN for the purpose of evidencing Skills First concession entitlement.

Instead, keep a written declaration attached to the student's file stating that you've sighted the evidence of concession – and don't record the CRN on the declaration.

Only keep a copy of the CRN if you must do so for other purposes, for example when using Centrelink confirmation e-services.

Read our fact sheet: concessions for more information.

## Other laws

You must comply with all other laws relating to recordkeeping, including:

- [Standards for registered training organisations 2015 \(National Standards\)](#)
- [VRQA guidelines for VET providers](#)
- [Privacy and Data Protection Act 2014 \(Vic\)](#)
- [Privacy Act 1988 \(Cth\)](#)

Under national standards, you must cooperate with the VET regulator in the retention, archiving, retrieval, and transfer of records.

## Further information

- Submit an enquiry via [SVTS](#)
- [Fact sheet: using electronic signatures](#)
- [Fact sheet: evidence of participation](#)
- [Guidelines about eligibility](#)
- Office of the Victorian Information Commissioner: [Information privacy principles short guide](#)
- Office of the Victorian Information Commissioner: [Guidelines to the information privacy principles](#)
- [Fact sheet: concessions](#)