

Information Management Policy

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Information Management Policy and Compliance Requirements Mapping

Policy Content	Compliance Requirements
	Information and Transparency
Privacy	Information Management – Personal Information and Privacy Laws
Records	Information Management – Retention of VET Student Assessment Records
Issuing of Qualifications	Integrity of Nationally Recognised Training Products - AQF Certification Documentation
Student Identifiers	Integrity of Nationally Recognised Training Products – Student Identifiers
Transition Training Products	Integrity of Nationally Recognised Training Products

Privacy

Achievers College is bound by the Terms of the Privacy Act of 1988 and the Australian Privacy Principles (APP) as identified in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and is committed to respecting the privacy of individuals who receive a service through its programs.

We are also aware of our statutory responsibilities under the Data Provision Requirements 2011 and National VET Data Policy to meet the AVETMISS¹ requirements. This includes ensuring the data is securely retained for 30 years.

Further, we will ensure that all students are informed on enrolment regarding how their personal information collected by or on behalf of governments may be used. Our Enrolment Forms include a specific, legislated Privacy Notice and Student Declaration.

Purpose of collection

We collect information for the following purposes relating to our business activity:

- AVETMISS annual mandatory reporting
- Issuance of certificates
- The collection and verification of USIs
- Feedback about the services provided
- Provision of information to the regulator -ASQA
- Provision of information to funding bodies
- Marketing support services
- Communication with students and other relevant stake holders
- Staff records.

Type of Information Collected

The following information is collected directly from students or employees through enrolment forms, online contact forms, employment records and contracts.

Personal information that is collected and stored:

- Contact details
- Employment details
- Educational background
- Demographic Information
- Competency completion information
- Tax file number in keeping with the TFN guideline
- Financial billing information.

Confidential information that may also be collected and stored:

- ID information and evidence
- Employee details such as resumes, qualifications

¹ Australian Vocational Education and Training Management Information Statistical Standard

- Information relating to complaint or appeals
- Disability status
- Any identified individual needs
- Indigenous disclosure
- Background checks (such as National Criminal Checks or Working with Children checks).

Procedures

- Only personal² information that directly relates to our activity as an RTO or training provider is collected.
- Personal information is only used for the purposes for which it was provided or for directly related purposes.
- Personal information is only collected directly from the individual or their authorised representative.
- All reasonable steps are taken to ensure personal information collected is accurate, up to date and complete; this includes updating information if advised it is out of date or incorrect.
- We disclose information on how the information is shared with the relevant regulatory bodies and government departments.
- We store all information in Axcelerate, a secure, cloud-based Student Management Systems with strong systems of data protection.
- We also have the following processes in place to protect personal information from interference, loss, unauthorised access, modification or disclosure and other misuse. These systems include:
 - The CEO is designated with the RTO's privacy accountability
 - privacy issues are a standing agenda item at Management/Staff/Trainer and Assessor meetings
 - all staff, including casual staff, contractors and third parties, sign confidentiality agreements or have confidentiality clauses included in their service contracts
 - monthly reviews of staff access rights to ensure they remain appropriate
 - logging user access and activity in the IT systems
 - managing and restricting the number of staff with administrator rights to the IT systems.
 - any staff are required to designate strong passwords for access to data and documents and change their passwords regularly
 - any staff are made aware passwords are not to be shared
- Personal information is destroyed or deleted when it is no longer required.
- We ensure individuals have lawful access to their personal information
- In certain circumstances where confirmation of identity is not legally required individuals can choose to remain anonymous, or to use a pseudonym. However, they will be made aware that choosing to do so may limit the options there are to deal with a given situation.
- We do not disclose information to overseas entities.

² For the purposes of this Policy personal information includes Personal Information and Sensitive Information as follows:

Personal information includes Contact details; Employment details; Educational background; Demographic Information; Records of Training and Assessment

Sensitive information includes Identity records; HR information, Disability or Welfare Recipient status information relating to complaints and appeals, cultural background, background checks

- Personal images for advertising, promotion or any other purpose are only used when written permission has been obtained.
- Personal information is only used for direct marketing purposes where it could be reasonably expected that the individual would be aware that the information would be used in that way.
- The CEO is responsible for checking that all students read and sign the designated Privacy Notice and Student Declaration.
- Staff, consultants and any third parties are informed of privacy requirements at induction or commencement.
- Privacy requirements are included in staff workshops and professional development activities.

Contact information

Anyone wanting more information regarding our privacy processes should contact the CEO on 0412 0298024 orinfo@achieverscollege.com.au.

Complaints

Any complaint regarding how we handle personal information will follow the Complaints and Appeals Process. This is publicly available on our website and in Student Handbooks.

Records

- Student Records
- Staff Records
- Data Reports
- Pre-enrolment and marketing information

Monitoring

- The CEO is responsible for monitoring any privacy issues.
- Privacy is a standing agenda item at Management/Staff/Trainer and Assessor Meetings, and staff are encouraged to discuss issues as they arise or as funding requirements, legislation or compliance-changes are identified.
- Compliance with legislation is included as part of the risk management process.
- Internal audits of information management processes occur annually.
- External audits will be conducted by as a part of our registration as an RTO at least every three years.
- Any complaint upheld related to a privacy matter will require a review of the systems we have in place to protect privacy.

Any of the above may result in changes to this policy. Any changes will be communicated to staff, any third parties and other stakeholders via internal communications, meetings, training and documentation. It will also be publicly published on our website. Student Handbooks will be updated accordingly.

Record Keeping

Achievers College is committed to implementing quality systems of records management that ensure retention, archiving, retrieval and transfer of records meet legislative requirements and the Standards.

We will ensure all documents and electronic records are kept in a safe, secure and confidential manner as required by Privacy Act 1998.

Procedure

Storage and Retention

All data and staff and student records will be maintained and stored as paper or electronic files in accordance with legislative requirements. Current electronic records will be password protected, and paper records will be filed in locked filing cabinets. Only staff whose duties relate to student administration or welfare will have access to student records.

Archived records will be stored and retained as follows:

- Electronic – backed up to SMS/ AXcelerate cloud storage system.
- Paper – stored in a locked, fire/ flood/pest safe storage facility.

The following records will be retained

- **Student information:** to be retained for a minimum of 2 years. This includes enrolment form, USI Privacy Notice (if applicable), correspondence, notes of meetings, fees paid and refunds made, deferrals or withdrawal requests, complaints and/or appeals records including outcome of complaint/appeal. If trainee – copy of training plan.
- **Records of AQF certification documentation** issued will be retained for a period of:
 - seven years if a student completes a training product on or after 1 January 2015
 - thirty years if a student completes a training product before 1 January 2015
- **Completed student assessment items** (including RPL): to be retained for at least two years following the VET student's completion of the training product.
- **Third party arrangements:** to be retained for 5 years. This includes copies of agreements or MOU's, copies of notification to ASQA, correspondence and evidence of monitoring of services delivered.
- **Funded programs:** data and records will be collected and retained according to the specification and guidelines of any funded program we deliver.
- **Management and administrative records:** to be retained for a minimum of five (5) years.

Archiving

- When course documents are archived, they will be stored in a manner which makes them readily accessible by clearly marking the year, course name and start date.
- Student files will be archived by year or are attached to the course documents.

Student Records

- All reasonable steps will be taken to ensure that the personal information collected is accurate, up to date and complete; this includes updating information if advised it is out of date or incorrect.
- Unique Student Identifiers will be collected from all students at enrolment.
- On reasonable request, students can have access to their records.
- Qualifications and Statements of Attainment will be reissued on reasonable request with relevant fee payment providing an USI has been provided by the student.
- Any third parties will be given access to student information only on receipt or written consent from the student; this includes employers.
- Access to student records may be provided where required by government bodies or law enforcement agencies. In all other instances students will be informed with who and why their personal information will be shared.

General Record Keeping

- Up-to-date employment records will be kept for all staffs
- Qualifications and records of professional development will be maintained for all staff and contracted trainers and assessors
- All Certificates, Statements of Attainment and any duplicates issued will be recorded in the Certificates register.
- Version control is applied to all documents according to the Version Control Policy and will ensure that only the latest versions are issued or reissued.
- If in the event, we cease business we will ensure all records are transferred to the relevant agencies

AVETMISS Reporting

- In accordance with the Data Provision Requirements 2012, we are maintaining the capacity to generate AVETMISS compliant data reports annually for NCVET and upon request for ASQA. For this purpose, we utilize Axcelerate.

Version Control

- Version control is applied to all documentation and the release and availability of documentation that is approved for use is tightly controlled.
- The key documents related to the registration of the RTO and the scope of registration are listed below and are subject to Version Control with file name and version date clearly identified in the footer of the document. These are controlled documents:
 - policies and procedures
 - training and assessment strategies
 - course information manuals and fee schedules
 - assessment tools
 - administrative forms
 - other compliance documents
- Version controlled documents are held on the Cloud/Achievers College one drive.
 - Documents may only be amended with the approval of the CEO or delegate.

Monitoring

- The CEO is responsible for ensuring record keeping meets the standards set in this policy.
- Internal audits of information management processes occur annually

- External audits may be conducted by as a part of our registration as an RTO or by a VET consultant at least every three years.
- Any complaint upheld related to a record keeping matter will require a review of the systems we have in place.

Records

- Records will be retained and archived as detailed above.

Issuing of Qualifications

Achievers College will issue qualifications according to its scope of registration and as specified in the Integrity of Nationally Recognised Training Products Compliance Requirements.

Specifically, we will issue AQF certification documentation within 30 days to a student who has completed the Qualification or unit(s), has been assessed as competent in accordance with RTO procedures and the requirements of the training product and has paid all agreed fees owing.

We recognise AQF certification documentation issued by any other RTOs.

Procedure

- We will use a master template for standardising certification document design, and this will be updated as national requirements change.
- Only the CEO has authority to sign certification documentation.
- Certification documentation can only be generated from the Student Management System after results are entered into the Student Management System. The assessor is responsible for providing Assessment Outcome Reports that clearly show the judgment of competency at the unit level.
- Certification documents will be issued within 30 days of completion of the training program for all students who have paid fees in full.
- One staff member will manage certificate production, but others will be trained to ensure continuity during absences.
- All issued certificates are recorded in the Certificate Register, which lists student names and certificate numbers by date. This controlled document is available for public inspection and audit.
- Certification documentation is issued individually to students in their own name and are intended for the private use of that student. Any other use or distribution must be approved by that student.
- Certification documentation will only be issued to students who have provided a USI unless an exemption applies under the Student Identifiers Act 2014.
- Replacement certification documentation will be issued after verification of the person seeking the certificate and payment of the scheduled fee.
- Transcripts of Results may be issued on the reverse side of qualifications or as a separate document.
- Where a third-party arrangement exists for training and assessment delivery, the responsibility for issuing the certification documentation remains our responsibility; certificates will not be issued by the third party.
- Delegated staff will update the Certificate Register and copy the signed certificate and transcript prior to sending or collection.
- Records of AQF certification documentation issued will be retained for a period of:
 - seven years if a student completes a training product on or after 1 January 2015
 - thirty years if a student completes a training product before 1 January 2015
- Records of AQF certification documentation are accessible to current and past VET students on request.
- For a certification documentation to be reissued the following applies:
 - a written request for a replacement certificate must be submitted. The identity of the applicant must be checked and verified
 - a fee is charged according to the current fee schedule and payable by the applicant

- the archived document and certificate register are the master references for re-issue of qualifications.
the re-issued certificate will show the original qualification
- Records of certification documentation issued will be provided to ASQA as requested.
- Student Identifiers (USIs) will not be included on Certificates.

Issuing AQF Qualifications

All AQF qualifications (Testamur) will comply with the AQF Qualifications Issuance Policy and include the following information:

- the name, National RTO code and logo of the issuing organisation
- the code and title of the awarded AQF qualification, and
- the NRT Logo in accordance with the NRT Logo Conditions of Use Policy
- the authorised signatory
- the issuing organisation’s seal, corporate identifier or unique watermark
- the words ‘The qualification is recognised within the Australian Qualifications Framework’ or any AQF logo authorised by the AQF Council

The following elements are to be included on the Testamur as applicable:

- the industry descriptor, e.g. Engineering
- the occupational or functional stream, in brackets, e.g. ‘(Fabrication)’
- where relevant, the words, ‘achieved through Australian Apprenticeship arrangements’
- where relevant, the State/Territory Training Authority logo (only where use of the logo is directed by State/Territory Training Authorities)
- where relevant, the words, ‘these units/modules have been delivered and assessed in <insert language>’ followed by a listing of the relevant units/modules

Issuing Statements of Attainment

All statements of attainments will comply with the AQF Qualifications Issuance Policy and include the following information:

- the name, National RTO Code and logo of the issuing organisation
- a list of units of competency (or modules where no units of competency exist) showing their full title and the national code for each unit of competency
- the authorised signatory
- the NRT Logo with the NRT Logo Conditions of Use Policy
- the issuing organisation’s seal, corporate identifier or unique watermark
- the words ‘A statement of attainment is issued by a Registered Training Organisation when an individual has completed one or more accredited units’

The following information will be included on the statement of attainment as applicable:

- the words ‘These competencies form part of [code and title of qualification(s)/course(s)]’
- the words, ‘These competencies were attained in completion of [code] course in [full title]’
- where relevant, the State/Territory Training Authority logo (only where use of the logo is directed by State/ Territory Training Authorities)
- where relevant, the words, ‘these units / modules have been delivered and assessed in <insert language>’ followed by a listing of the relevant units/modules.
- comply with the AQF Qualifications Issuance Policy.

Nationally Recognised Training Logo

When issuing AQF Certificates, we will only use the Nationally Recognised Training Logo in accordance with the Nationally Recognised Training Conditions of Use Policy.

Monitoring

- The CEO is responsible for ensuring that qualifications are issued as set out in this policy.
- Internal audits of the qualification issuing process occur annually.
- Any complaint upheld related to the issuing of qualifications will require a review of the systems we have in place.

Records

- Certificate Register
- Copies of certification documentation
- Records of Outcomes Reports
- Position Descriptions

Student Identifiers (USI)

Achievers College will implement the national requirements for the Unique Student identifier (USI) and will adhere to all legislative requirements under the USI Student Identifiers Act 2014 and Standards for NVR Registered Training Organisations 2015 and any amendments; this includes all Privacy requirements.

We understand that if we fail to collect and report USIs for all students it will impact on our ability to lodge our annual AVETMISS data and put us in breach of the requirements of the Standards and the National VET Data Collection obligations.

Procedure

- All students will be provided with information regarding the use of USIs and how to apply for them prior to enrolment. This information will be on our website and in our Student Handbooks.
- All students will be asked for their USI on enrolment.
- All students will be notified that we will be unable to award certification documentation unless a USI is provided and verified for any training product no matter its length of delivery.
- It is expected most students will be able to manage their own USI through the USI website. However, where a student is unable to obtain their own USI they can authorise a staff member to obtain it on their behalf by signing the [Privacy Form](#).
- USI will be verified at enrolment with the Registrar (www.usi.gov.au).
- Any USIs which are not successfully verified by the Registrar will not be used/recorded until the issue has been identified and rectified.
- An USI must have been verified before issuing certification documentation. Attainment.
- Information gathered to create a USI will be destroyed upon completion in line with the Privacy Policy. (Privacy Act 1988).
- The privacy of USI will be protected within all administrative tasks.
- Students will be informed as to when their new credentials will appear on their USI record.
- Staff will be trained in all aspects of USI administration and access and all computer security checked to ensure all unauthorised access is blocked.
- The CEO or delegate will be designated to administer the USI system.

Exemptions

The following students only are exempt from providing USIs:

- International students undertaking their entire VET course outside Australia (also known as offshore training).
- Students who have completed their VET training prior to 1 January 2015 but have not yet been issued with a qualification or statement of attainment in respect of that training.
- Students who have applied for and obtained an individual exemption in writing from the Student Identifiers Registrar because they have a genuine personal objection to being assigned a USI.

If a student is provided with an exemption, they will be informed that prior to either the completion of the enrolment or commencement of training and assessment, whichever occurs first, that the results of the training will not be accessible through the Commonwealth and will not appear on any authenticated VET transcript prepared by the Registrar.

Records

- The Student Management System – USI data entry.

Transition Training Products

Achievers College is committed to managing our scope of registration and transitioning to revised training products in a timely fashion to meet the Compliance Requirements– Integrity of Nationally Recognised Training Products. We recognize the importance of staying updated on changes to training packages to ensure enrolling and existing students are transitioned within the specified timeframe.

Procedure

We will put the following procedures in place to ensure that all training products we deliver are current:

- The CEO or delegate will be responsible for:
 - checking the National Training Register and reporting any changes to training products
 - subscribing to training.gov.au to receive notifications of changes on all training products on scope
- reporting any changes to training packages and any transition management issues at Management Meeting/Staff/Trainer Meetings as per the Standing Agenda requirement.
- The Management Team will decide on the appropriate actions to be made regarding transition arrangements. This will include
 - setting a transition date for the product and corresponding dates for marketing and enrolment to ensure no new VET students are enrolled in the superseded training product from the period commencing one year from the date the replacement training product was released on the National Register
 - setting training and assessment completion dates for existing students in the superseded training or dates to transfer students into the replacement training product.
- Where an AQF qualification is no longer current and has not been superseded, we will set dates to ensure all students' training and assessment is completed and the relevant AQF certification documentation is issued within a period of two years from the date the AQF qualification was removed or deleted from the National Register.
- Where a skill set, unit of competency, accredited short course or module is no longer current and has not been superseded, we will set dates to ensure all students' training and assessment is completed and the relevant AQF certification documentation is issued within a period of one year from the date the training product was removed or deleted from the National Register.
- During the transition period we will review training product changes and the Training Package Companion Volume Implementation Guide on the national register and assess the impact these changes will have on licensing, resources, equipment, training and assessment strategies and our capacity to deliver.
- Where the new Training Product is equivalent to the old one and the decision is to keep it on scope, the Training and Assessment Strategy will be revised and amendments made to all documents including training and assessment resources, pre-enrolment information, marketing material, websites, the student management system and student/ trainer information. This will be as per the Training Package Transition Checklist.
- Where the new Training Product is not deemed equivalent, an application to add to scope will be submitted to ASQA. On notice that scope has been updated, Training and Assessment Strategies and resources will be updated to reflect any changes in the packaging and course

delivery requirements. All other documentation and electronic data and systems will also be updated as per the Training Package Transition Checklist.

- It is noted that the above arrangements do not apply where a training package includes the requirement to deliver a superseded unit of competency.
- Students, trainers and assessors and other stakeholders will be kept informed of changes to scope or registration and transition arrangements and their implications for them by email and updates on our websites.
- Students who have not completed training and assessment in all units of the superseded Qualification by the end of the transition period will be transferred to the replacement units. Mapping of new units to old will occur and the student will be given the opportunity to engage in training and assessment to ensure any identified gaps are met. Where units are deemed equivalent, they will be issued with Credit Transfer for the new units.
- Trainers and Assessors will be provided with Professional Development regarding the transitioning arrangements, the changes in training package requirements and their impact on course delivery and on training and assessment resources.
- Trainers and Assessors will have the opportunity to upgrade their qualification to meet the new training package requirement when necessary.

Records

- Minutes of Management Meetings
- Evidence from the Student Management System demonstrating that no students were enrolled in a superseded training product beyond the relevant date.
- Copies of Certificates and Statement of Attainment showing none were issued for superseded training products beyond the relevant date.
- Version control of Training and Assessment Strategies and other relevant documents showing use of current training product codes and names.
- Updated Training Package Transition Checklists

Supporting Documents

VET Compliance Manager Position Description

Related Policies

- Student Information Policy
- Complaints and Appeals Policy
- Risk Management Policy

References

- [The Privacy Act 1988](#)
- [Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#)
- [Australian Privacy Principles](#)
- [National Vocational Education and Training Regulator \(Data Provision Requirements\) Instrument 2020](#)
- [National VET Data Policy](#)
- [NCVER Standard enrolment questions example form including Privacy Notice](#)
- [Schedule 5 The AQF qualifications issuance policy within the VET sector](#)
- [Student Identifiers Act 2014](#)

- [Application for exemption of USI](#)
- [Australian Government: USI website](#)