



PP34 – Data Privacy and Record Keeping Policy

1. Purpose

This policy ensures that the RTO manages student and staff records in a manner that protects personal information, meets legislative data privacy obligations, and aligns with Clause 10 of the Standards for RTOs 2025. The policy also ensures that record keeping practices support transparency, accuracy, and regulatory compliance.

2. Scope

This policy applies to:

- ✚ All personal and training records of students
- ✚ RTO staff, contractors, and third parties who handle personal or sensitive information
- ✚ Storage, access, and disposal of physical and digital records

3. Definitions

Term	Definition
Personal Information	Information or opinion that identifies or could identify an individual (e.g., name, address, date of birth, USI)
Sensitive Information	A subset of personal information including health, disability, racial background, or religious beliefs
AVETMISS	The data standard used to collect VET sector data
NCVER	National Centre for Vocational Education Research
USI	Unique Student Identifier – mandatory for all nationally recognised training
PRISMS	Provider Registration and International Student Management System used for international student reporting

4. Legislative References

- ✚ Standards for RTOs 2025 – Clause 10
- ✚ National Vocational Education and Training Regulator Act 2011
- ✚ Australian Privacy Principles (Privacy Act 1988)
- ✚ Archives Act 1983





- ✚ Data Provision Requirements 2020
- ✚ AVETMISS and USI Reporting Requirements

5. Policy Statement

The RTO is committed to:

- ✚ Protecting the privacy of personal and sensitive information it collects
- ✚ Meeting all legislative requirements for the retention, storage, and security of records
- ✚ Ensuring students have access to their records upon request
- ✚ Retaining training and assessment records for at least 30 years
- ✚ Retaining other required records (e.g., complaints, appeals, enrolment records) for a minimum of seven years, or as otherwise legally required
- ✚ Implementing strict access controls and secure disposal practices

6. Procedure – Step-by-Step

Step	Action	Responsible Person	Timing
1	Collect personal information only where necessary (e.g., enrolment, LLN, AVETMISS, USI)	Admin Officer / Student Support	At enrolment
2	Ensure all personal data is collected with consent and privacy notice is provided	Admin Officer	During enrolment
3	Store physical records in locked cabinets and digital records in password-protected systems with backups	Compliance Manager / IT Support	Ongoing
4	Provide students access to their personal and training records upon written request	Compliance Manager	Within 10 business days
5	Regularly review access controls and restrict data handling to authorised staff only	Compliance Manager	Quarterly
6	Back up digital data daily and store backups securely off-site or in a secure cloud	IT / Compliance	Daily
7	Archive training and assessment records securely for 30 years	Admin Officer / Compliance	Ongoing
8	Retain financial, complaint, appeal and enrolment records for 7 years minimum	Admin Officer	Ongoing
9	Securely dispose of expired paper records by shredding or certified destruction	Admin / Compliance Manager	As required





Step	Action	Responsible Person	Timing
10	Train all staff annually on data privacy responsibilities and breach response	Compliance Manager / CEO	Annually
11	Report any data breaches to the CEO and investigate in line with the Notifiable Data Breaches Scheme	Compliance Manager	As required

7. Related Documents

- ✚ Student Enrolment Form
- ✚ Privacy Notice
- ✚ Access to Records Request Form
- ✚ Complaints and Appeals Register
- ✚ Records Management Procedure
- ✚ RTO Data Retention Schedule
- ✚ Staff Confidentiality Agreement





8. Flow chart

Data Privacy and Record Keeping Process





(Clause 9 and Clause 11), the AQF Qualifications Issuance Policy, and the NRT Logo Conditions of Use. It supports timely, accurate, and lawful certification of VET student achievements.

2. Scope

Applies to all certification issued by the RTO for:

- ✚ AQF qualifications
- ✚ Statements of attainment
- ✚ This includes full qualifications, partial completion of units, and withdrawal situations where at least one unit is completed.

3. Definitions

Term	Description
AQF	Australian Qualifications Framework
Qualification	A nationally recognised credential for completion of a training product
Statement of Attainment	A formal record of partial completion or withdrawal where one or more units are completed
SMS	Student Management System, used to generate official documentation
NRT Logo	Nationally Recognised Training logo for use on compliant certificates

4. Legislative and Regulatory References

- ✚ Standards for RTOs 2025 – Clause 9 and Clause 11
- ✚ AQF Qualifications Issuance Policy
- ✚ NRT Logo Conditions of Use Policy
- ✚ National VET Regulator Act 2011
- ✚ Student Identifiers Act 2014

5. Policy Statement

The RTO will only issue AQF certification documentation to individuals who:

- ✚ Have been formally assessed as competent in accordance with the training package rules;
- ✚ **Have completed either:**
 - A full AQF qualification, or





- One or more units of competency from an AQF qualification and subsequently withdrawn from the qualification;
- ✚ Have met all agreed fee payment requirements;
- ✚ Have had their student and assessment records verified for compliance;
- ✚ Will receive their certification within 30 calendar days of completion of assessment, subject to the above conditions.

All certification is generated through the SMS to maintain standardised, accurate, and compliant document control.

6. Certificate Issuance Conditions

6.1 AQF Qualifications Must Include:

- ✚ RTO's name, registration code, and logo
- ✚ Code and full title of qualification (as on training.gov.au)
- ✚ NRT logo (as per logo policy)
- ✚ Signature of an authorised signatory
- ✚ RTO's seal, identifier, or unique watermark
- ✚ **Statement:** "The qualification is recognised within the Australian Qualifications Framework" or AQF logo
- ✚ **If applicable:**
 - Industry descriptor
 - Occupational/functional stream in brackets
 - "Achieved through Australian Apprenticeship arrangements"
 - Language delivery statement for multilingual delivery

6.2 Statements of Attainment Must Include:

- ✚ RTO's name, registration code, and logo
- ✚ Full title and code of each unit/module
- ✚ NRT logo (as per logo policy)
- ✚ Signature of authorised signatory
- ✚ RTO seal, identifier, or watermark
- ✚ **Statement:** "A VET statement of attainment is issued by an NVR registered training organisation when an individual has completed one or more accredited units or modules."
- ✚ **If applicable:**
 - Statement of qualification the unit(s) belong to





- Statement of attainment from partial course
- Language delivery statement for multilingual delivery

7. Procedure – Step-by-Step

Step	Action	Responsible Person
1	Verify Completion: Confirm student has either completed all units of an AQF qualification or completed some units and formally withdrawn from the course.	Admin Officer and trainer
2	Compliance Check: Review enrolment, completed assessments, PTR (Pre-training review), fee status, and USI.	Compliance Manager
3	Confirm Fees Paid: Ensure all course-related fees have been paid in full.	Accounts Officer
4	Generate Certificate: Use SMS to generate Testamur + Record of Results or Statement of Attainment. Ensure correct inclusion of required information and logos (as per (Compliance Standards) Section 11 and AQF policy).	Admin Officer/ Compliance Manager
5	Final Sign-Off: Check USI, product codes, trainer declaration, and eligibility type.	Compliance Manager
6	Issue Certificate: Email digital copy, file PDF, and provide hard copy. SMS keep the log of issued Testamur.	Admin Officer
8	Re-issue Requests: Process within 10 business days with proof of ID after the re-issue fees.	Admin Officer

8. Compliance Assurance

Before issuing a certificate, the following must be verified:

- ✚ Student has completed the full qualification or eligible units.
- ✚ All assessments are valid and completed.
- ✚ Student has withdrawn but has completed at least one unit – issue SoA.
- ✚ All documentation complies with (Compliance Standards) Section 9-11 (logos, wording, signatures).
- ✚ Certification is not issued until all **fees** are paid.
- ✚ AQF Logo and NRT Logo are applied in accordance with guidelines.

9. Non-Compliance Handling

- ✚ If any non-compliance is discovered post-issuance, the certificate will be revoked and a replacement issued once compliance is ensured
- ✚ Errors are logged in the Continuous Improvement Register





10. Related Documents

- ✚ Student Management System (SMS)
- ✚ Certification Register- SMS
- ✚ PP3 – Assessment Tools and Systems Policy
- ✚ PP31 - Enrolment Policy
- ✚ PP32 - Fee Management and Refund Policy
- ✚ Compliance Audit Checklist (certificate Issue)
- ✚ SMS User Guide for Certificate Generation

[Fact sheet - Sample forms of AQF certification documentation.pdf](#)

11. Flow chart



Certification Issuance Policy

Verify Completion

Confirm student's course status



Compliance Check

Review enrolment and assessments

Generate Certificate

Create digital and hard copies



Confirm Fees Paid

Ensure all fees are settled

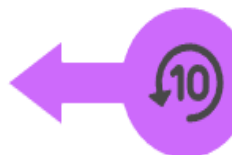
Final Sign-Off

Check eligibility and declarations



Issue Certificate

Distribute digital and hard copies



Re-issue Requests

Process re-issue requests within 10 days