

**Audit Guide – Clause 3.6**

- 3.6. The RTO meets the requirements of the Student Identifier scheme, including:**
- a) verifying with the Registrar, a Student Identifier provided to it by an individual before using that Student Identifier for any purpose;**
  - b) ensuring that it will not issue AQF certification documentation to an individual without being in receipt of a verified Student Identifier for that individual, unless an exemption applies under the Student Identifiers Act 2014;**
  - c) ensuring that where an exemption described in Clause 3.6 (b) applies, it will inform the student 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; and**
  - d) ensuring the security of Student Identifiers and all related documentation under its control, including information stored in its student management systems.**

**What is this clause about:** This clause requires the RTO to comply with the requirements of the *Student Identifiers Act 2014*. Introduced in January 2015, this legislation requires that all learners awarded a nationally recognised outcome must hold a valid Unique Student Identifier. To understand the USI requirements, visit the following site and read everything: <https://www.usi.gov.au/training-organisations>. Most student management systems have an inbuilt capability to verify and create a learner's USI. The learner and the RTO can also undertake these functions on the USI system if they are registered to do so. The key things that will be subject to review during a regulatory audit are: That you inform learners about their USI obligation (including exemptions) prior to their enrolment, that you apply a process to collect and verify a learner's USI, that no AQF certificates are issued without verifying the learner's USI and that you apply suitable security arrangements to protect access to a learner's USI information.

A little-known fact is that the USI under the *Student Identifiers Act 2014* is categorised as sensitive information as defined in the *Australian Privacy Principles*. The USI is classed as biometric information that is to be used for certain purposes. The RTO has a legal obligation to ensure that the learner's USI is never distributed to unauthorised persons and its access within the RTO is closely restricted only to those who are authorised and have a need to access the information. Read more about the learner's Privacy and the Unique Student Identifier at the following link ([click](#)).

<p><b>Evidence to prepare:</b></p> <ul style="list-style-type: none"> <li>– Evidence of pre-enrolment information provided to the learner that informs them about their rights and obligations regarding the USI</li> </ul>	<p><b>You must be able to demonstrate that:</b></p> <ul style="list-style-type: none"> <li>– You provide information to prospective learners (prior to enrolment) about their obligation to hold a USI and of relevant exemptions that may apply</li> </ul>
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<ul style="list-style-type: none"> <li>– Evidence of how the organisation collects a USI from a learner</li> <li>– Evidence of how the organisation creates or verifies a USI on behalf of the learner during the enrolment process</li> <li>– Evidence of how USI details and document verification evidence is being stored to protect the privacy of the learner</li> <li>– Evidence that demonstrates that the USI is not included in any AQF certificates</li> <li>– Access to student management system to verify that no AQF certificates have been issued without holding a valid USI</li> </ul>	<ul style="list-style-type: none"> <li>– You provide information to prospective learners (prior to enrolment) on how the learner can access an authenticated VET transcript from USI system that details their achievements (<a href="#">click</a>)</li> <li>– You have a process to verified the USI either on the USI system or within your student management system before it is relied on to issue AQF certificates</li> <li>– You have appropriate security arrangements to protect the privacy of learners and prevent unauthorised access to the learner’s USI details</li> </ul> <p><b>You should prepare for these types of questions:</b></p> <ul style="list-style-type: none"> <li>– Can you talk me through the process for informing learners about their obligation to supply a valid USI? Can you show me where this information is provided prior to enrolment?</li> <li>– What mechanism do you use to verified a learner’s USI? Can you show me how this works and where you keep details of the verification?</li> <li>– How do you protect access to the learner’s USI? Who else has access to this system?</li> <li>– Have you awarded any AQF certificates since January 2015 without holding a valid USI of the learner? Can we access learner records in your student management system in March/April 2015 to verify this?</li> </ul>

## **Newbery's Audit Guide - Standards for Registered Training Organisations (RTOs) 2015**

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