



POLICY NAME	USI Policy			POLICY NO.	2024.22
EFFECTIVE DATE	01/03/2021	DATE OF LAST REVISION	12/05/2025	VERSION NO.	2
ADMINISTRATOR RESPONSIBLE	Sarah Burnett		CONTACT INFORMATION	admin@AHRT .com.au	
APPLIES TO Apply group names to define applicable areas of staff.					
GROUP 1	Trainers and Assessors	GROUP 2	Administration Staff	GROUP 3	Directors and Managers
GROUP 4	Students	GROUP 5	Organisations	GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1	Sarah Burnett		Initial publication	Sarah Burnett
2	Sarah Burnett	12/5/25	Change to reflect new standards and updated information	

APPROVAL AND REVIEW

ADDITIONAL NOTES

## PURPOSE

This policy outlines how AHRT manages student Unique Student Identifiers (USIs) in compliance with the *Student Identifiers Act 2014* and the *Standards for Registered Training Organisations 2025*, particularly Section 12 (Student Identifier requirements). It establishes the RTO's responsibilities for USI creation, verification, reporting, and data security, and ensures all legal obligations (including privacy under the *Privacy Act 1988*) are met. This policy also informs students of their rights and obligations regarding USIs

## SCOPE

This policy applies to all staff involved in student enrolments, data management, and certification at AHRT, as well as all learners (including new, continuing, school-based, and international students) undertaking nationally recognised training with AHRT and covers the processes for collecting, verifying, and reporting USIs, procedures for handling exemptions, and measures to protect personal information.

This policy applies to all VET student enrolments (new enrolments, pre-enrolled and continuing students) in nationally recognised training, except those students who are deemed to be exempt. Exemption categories are:

- An individual who has completed all the requirements for the VET qualification or VET statement of attainment before 1 January 2015.
- Students who demonstrate a genuine personal objection to being assigned a USI.

This exemption can only be granted by the Student Identifiers Registrar as it applies under the Student Identifiers Act 2014.

## POLICY STATEMENT

AHRT will ensure that every student undertaking nationally recognised training provides or obtains a valid USI. The RTO is committed to meeting all requirements of the USI scheme, including the creation, verification, and secure management of USIs, and the timely reporting of USIs and associated training data. No AQF qualification or statement of attainment will be issued to any learner without AHRT being in receipt of a verified USI for that individual, unless a documented exemption applies. The RTO will integrate USI processes into its student management system to maintain data accuracy and to comply with Section 12 of the Standards for RTOs 2025, which mandates timely USI reporting, system integration, and accuracy of student data.

## POLICY DETAILS

From 1 January 2015, as training provider, AHRT is required to collect and report a students' Unique Student Identifier (USI) number.

This applies to:

- New students
- Pre-enrolled students
- Continuing students
- School students completing nationally recognised training.

As an authorised third party in creating a USI on behalf of a student, AHRT is required by law to destroy the personal information it has collected from a student to create a USI on its behalf, as soon as possible after making the USI application.

The Unique Student Identifier (USI) is a ten-digit, government issued student number, required for all students in nationally recognised VET training from 2015. This number links to an online account to provide each student with a single record of all their nationally recognised VET training.

A student must give written permission to AHRT to:

- Create a USI on its behalf
- Search for their USI
- View and/or update details on their USI account
- Disclose their USI to another provider
- View their VET transcript.

Providers do not need a student's permission to verify that their USI is correct. Doing so is a requirement under the Student Identifiers Act 2014.

A student's privacy is protected under the Student Identifiers Act 2014 and the Privacy Act 1988. Training organisations are required to give the student a privacy notice explaining how their personal information will be used.

Students can choose to allow a Registered Training Organisation (RTO) to view their full VET transcript through the USI Organisation Portal. Students can also download their full transcript, or an extract of their transcript, and provide it via email or a hard copy.

Students can permit an education or training provider to view and/or update their details directly through the USI Registry System. This means the provider can:

- View the student's personal information such as their contact details
- Update the student's personal information such as their contact details
- View the student's full VET transcript (applicable for Registered Training Organisations only).

AHRT will ensure:

Prospective students are provided with information about the USI prior to enrolment.

Information provided to prospective students includes:

- The requirement to obtain a USI prior to enrolment by visiting <https://www.usi.gov.au> (except where a USI has already been obtained by the student at a previous enrolment at AHRT or elsewhere).
- The importance of ensuring that the personal details provided in the process of obtaining a USI must be identical to those provided to AHRT at enrolment (i.e. exact name, date and place of birth, gender, contact details, identification documents etc.).
- The need to provide their USI as part of the application process and or on before issuance of AQF certification documentation.

Students who express a genuine personal objection to being assigned a USI will be advised to apply to the Student Identifiers Registrar for an exemption.

Students with a valid exemption from the USI requirement will be informed that they will not be able to access records or results of their training through the Commonwealth register and will not appear on any authenticated VET transcript prepared by the USI Registrar.

Students who complete an application without a USI will be supported to access the website to obtain their USI as part of the application process.

If a student has difficulty with the application of the USI, they may request that a AHRT staff member apply for and create a USI on their behalf. In this case:

- Written permission will be sought and must be provided by the student, prior to AHRT accessing the register and creating the USI.
- Before applying for and creating a USI on behalf of a student, AHRT will provide the student with a USI Privacy Notice explaining how their personal information will be used.
- Evidence gathered as proof of ID (e.g. Australian passport, non-Australian passport (with Australian visa), Australian birth certificate, Australian driver's licence, Medicare card, Centrelink concession cards, citizenship certificate, ImmiCard) for the purpose of creating a USI will be securely held until it is no longer required.

Any personal information provided by the student used for the sole purpose of creating or verifying a USI will be kept confidential and destroyed using secure methods after the process of obtaining or verifying the USI is complete.

If verifying existing USI information, the student will be required to log into their own USI account to set permission for AHRT to access their information.

The information provided by the student is recorded in the student management system (SMS) and verified on the USI Registry:

- where the USI is verified, no further action will be taken. ii. where the USI is missing or is not able to be verified, the student will be followed up by a staff member.

Notify students who are non-exempt and don't have a valid USI recorded that their enrolment may be withdrawn and that they will not be issued any AQF certification documentation until the necessary information has been provided.

Provide a student who does not have a USI in place a USI Privacy Notice explaining how their personal information will be used.

Not provide AQF certification documentation to non-exempt students who have not provided a valid USI as outlined in the Student Identifiers Act 2014.

Prior to issuing AQF certification check that the student has a valid USI before processing the request.  
m. Not include the students USI on any reports, including enrolment, AQF certification documentation or transcripts of results etc.

Handle student personal information in accordance with the requirements of the Privacy Act 1988 and Student Identifiers Act 2014.

Access to the SMS where the USI is stored and verified will be limited to those staff who are required to use the system as part of their daily duties.

AHRT will not:

- Create a USI without the student's permission.
- Activate a student USI account by setting a password and check questions.
- Find, view or update a USI without the student's permission.
- Ask students to disclose their USI account password and check questions.

When applying for a USI on behalf of a student – privacy requirements – AHRT asserts that:

- It will provide the student with a privacy notice.
- The student understands and consents to the privacy notice.
- It has advised the student that if they do not provide all the information requested, or if it is inaccurate, it may affect the Student Identifiers Registrar's ability to provide them with a USI. In accordance with section 11 of the Student Identifiers Act 2014, AHRT maintains that it will securely destroy personal information which it collects from students solely for the purpose of applying for a USI on their behalf as soon as practicable after having made the application or the information is no longer needed for that purpose, unless legally required to retain it.

## USI Exemptions and Special Cases

Under certain limited circumstances, a student or training program may be exempt from the requirement to have a USI. These exemptions are defined by the Student Identifiers Act and associated legislative instruments, and by policies such as the National VET Data Policy. AHRT will only apply an exemption in strict accordance with the official guidelines and will document any exemptions thoroughly. Below we outline possible exemptions and how we handle them:

### Permissible Exemptions:

- **International Students Studying Outside Australia (Offshore):** If an international student undertakes training with AHRT while **located outside of Australia for the entire duration of the training**, they are not required to obtain a USI. For example, if AHRT provides an online course and the student remains overseas (never coming to Australia for any part of the course), that student is exempt from needing a USI. In such cases, AHRT will use the designated code "INTOFF" (International Offshore) in our student management system and AVETMISS reports to indicate that the student is exempt due to being offshore. We will maintain evidence, such as a declaration of the student's location or visa status, to substantiate the use of this exemption if audited. It will be clearly communicated to the student that because they do not have a USI, their training outcome will not appear on any USI-managed VET transcript, and they will rely on the certification issued by AHRT as proof of their qualification.
- **Individual Exemption Granted by the Student Identifiers Registrar:** Individuals who have a genuine personal objection to being assigned a USI (for instance, due to religious or personal beliefs) may apply to the Student Identifiers Registrar for an exemption. If the Registrar approves an exemption, the student will receive a **USI Exemption Letter** confirming this status. Should a student present such a letter to AHRT, we will verify its authenticity and then file it as evidence. For that student, ahrt will not collect or report a USI. Instead, we will use the special exemption code provided (if any) or follow the Registrar's instructions for reporting (the Registrar's letter may outline how to report training for an exempt person). As per the guidance, if a student has an official exemption letter, AHRT does **not** need to ask for further details about the reason for

exemption nor require them to complete the USI privacy notice (since their data won't be entered into the USI system). However, we may still have our own internal privacy acknowledgment since we still collect some personal data for our records. We will respect the student's decision and ensure they are treated equitably in training. Importantly, we will inform the exempt student of the implications: their achievements will not be recorded by the USI Registrar and thus will not be visible on any authenticated VET transcript. The student should keep their certificate and academic records safe, as replacement evidence from the USI system will not be available. Note that under current rules, certain students cannot be exempt even if they wanted to (for instance, anyone seeking Commonwealth financial assistance like VET Student Loans must have a USI, so exemptions of this type are expected to be extremely rare).

- **Provider/Program Exemptions (National Security or Specialized Training):** The National VET Data Policy (section 5.3) allows regulators (like ASQA or state authorities) to grant RTOs an exemption from submitting AVETMISS data (including USIs) for specific programs, typically on the grounds of national security, sensitive defense training, or similar. For example, if AHRT were contracted to deliver a confidential program for defense personnel where even reporting the data is classified, we might be granted a data reporting exemption. In such a case, that cohort of students would effectively be exempt from the USI requirement because their data isn't reported into the national system. If AHRT ever operates under such an exemption, we will maintain documentation of the regulator's exemption decision. We would still issue certificates to students, but as with other exemptions, those students' outcomes would not appear in the USI system. We would also inform those students discreetly that their training won't be in the USI transcript, likely by virtue of the nature of the program. Provider exemptions are generally blanket and initiated by the regulator, so this would be handled in partnership with the authorities.

**Informing and Documenting Exemptions:** In all exemption cases, HART will **inform the student prior to enrolment or at least before training commences** about the consequences of proceeding without a USI. This notification will be given in writing (for example, via an email or letter to the student, or included in a section of the enrolment form that the student signs). The notification will state that because the student will not have a USI, the record of this training **will not be available through the Commonwealth USI transcript system** and cannot be verified through the USI Registrar. We will ensure the student understands this by providing an opportunity to discuss any concerns. For instance, an overseas student might be concerned about how to later provide proof of their Australian qualification – we would advise them to keep their certificate and we could also offer to later verify the qualification directly if an employer or institution contacts us (with the student's consent).

We also **retain evidence** of any exemption in our records: this could be the student's exemption letter, a copy of the regulatory directive for a program exemption, or an email from the student acknowledging they do not need a USI due to being offshore. During audits or quality checks, we will be able to produce this evidence to show why a USI was not obtained for particular students.

### **Record Keeping and Evidence of USI Verification**

AHRT maintains comprehensive records of all actions taken to comply with USI requirements. This ensures accountability and provides evidence for quality assurance or auditing purposes. Key record-keeping practices include:

- **USI Verification Evidence:** For each student, AHRT retains evidence that their USI was verified with the USI Registrar. Our student management system automatically logs a verification status/date for each USI. These system logs show that on a certain date, a staff member verified the USI against the Registrar's database (with a successful result or any error codes if applicable). We treat these system records as evidence of verification. In cases where verification was done via the USI web portal (external to the SMS), staff will save a record of the verification. This might be a screenshot of the portal confirmation or an automated email from the USI system if one is

sent. All such evidence is stored in the student's administrative file (electronically). At a minimum, the student's file will contain a notation like "USI xyz123verified on [date] by [staff name]" which can be shown to auditors. By keeping verification evidence, AHRT can demonstrate that we fulfilled our obligation to verify the USI before using it, as required by the Standards and legislation.

- **Consent Records:** When AHRT creates a USI on a student's behalf, we keep the signed consent form or record of consent. This could be the section of the enrolment form where the student ticked consent, or a separate form specifically for USI creation consent. This document is filed (scanned and stored) with the student's records. Additionally, if the student provided identity document details for USI creation, we note what documents were provided (e.g., "Student provided Medicare card for USI creation") in our secure notes. We do **not** keep copies of identity documents long-term, but we might keep a note or a verification result code to show that we verified the ID. The fact that we have the student's consent on file is important to demonstrate compliance with privacy requirements.
- **Exemption Records:** If any student is exempt from the USI requirement, AHRT will maintain all related documentation. For an offshore international student exemption, we might keep a copy of the student's visa information or a signed statement of their overseas location, to substantiate that exemption. For an individual with a Registrar's exemption, we will keep the **exemption letter** provided to us on the student's file. Our AVETMISS reporting for that student will use the appropriate exemption code, and we will keep notes in the student's record about the exemption (e.g., "Exempt from USI – Registrar's letter dated [date] on file"). This way, if in future there's any question why a certificate was issued without a USI, we have the evidence readily available.
- **Data Submission Records:** AHRT keeps copies of or access to the data files we submit to NCVER or state authorities, which include USIs. These files and the submission confirmations serve as evidence that we have reported the USIs as required. In case a student's transcript is missing data, we can refer back to these submission records to verify that we did include their USI and results. We also keep correspondence with NCVER or any support tickets (for example, if we needed to use the USI Transcript Update Tool to add a USI, we'd keep evidence of that action).
- **Retention Period:** All records relating to USIs are kept in accordance with the general student records retention requirements. Currently, for RTOs, records of issuance of qualifications must be kept for 30 years. Our evidence of USI verification and related documentation will be retained for a similar period as part of the student's record of attainment. Even if some working documents (like a copy of an ID document) are destroyed after use (as required by law), the fact of verification and issuance is kept long-term. If AHRT ceases to operate, arrangements would be made to transfer requisite records to the regulatory authority as per standard teach-out/closure requirements, which would include ensuring USI data reporting is up to date.
- **Confidentiality of Records:** The records described above (verification logs, consent forms, etc.) are considered confidential. We store them securely, and they are only accessed by staff who need to use them for compliance or audits. When providing records to auditors or regulators, we do so in a secure manner, given that these records may contain personal information. All records are subject to our Privacy Policy and procedures.

By diligently maintaining these records, AHRT can **demonstrate compliance** with all aspects of USI requirements at any time. It also helps us internally to track our performance (for example, we can review how quickly USIs were collected in each intake, or how many exemptions were handled, etc., as part of

continuous improvement). Our commitment is that no student will “fall through the cracks” – the records help ensure every student’s USI status is accounted for.

## Student Rights and Information

To ensure transparency and student empowerment, AHRT emphasizes students’ rights and obligations regarding the Unique Student Identifier. The following points are communicated to students through our Student Handbook, orientation sessions, and support services:

- **Right to Privacy:** Students have the right to expect that their personal information, including their USI and any identity documents provided, will be kept private and secure. AHRT will protect students’ USIs as required by law and will not reveal a student’s USI on any public document or to any unauthorized person. The USI system itself is designed with privacy in mind – for instance, an employer or other party cannot look up a student’s USI records without the student’s permission. Students can trust that providing their USI to AHRT is safe and solely for lawful purposes. If students have concerns about how their data is handled, they can refer to AHRT’s Privacy Policy or contact our Privacy Officer for information. The Student Identifiers Act also has provisions that protect students from misuse of their USI; for example, it is an offence for someone to collect a USI or use it without proper authority.
- **Access to USI Account and Training Records:** Every student who has a USI can access their USI account online (via the official USI website). AHRT encourages students to log in to their USI account periodically. Through this account, a student can see a list of all their nationally recognised training outcomes submitted by RTOs. This is often called the **USI Transcript**. Students have the right to view this transcript and use it for their own reference. It can be a valuable tool to track progress, especially if the student has taken courses with multiple providers. If a student notices any discrepancy or missing information in their USI transcript for training delivered by [RTO Name], they have the right to contact us and have it investigated. We will then check our records and submissions and correct any errors so the transcript is accurate. Essentially, students have a right to an accurate record of their training, and AHRT supports that by ensuring data accuracy and helping students resolve issues. Additionally, students can download or print their USI transcript as needed (though note, the USI transcript isn’t a replacement for a certificate but is a supplementary record).
- **Control Over Who Can See Their Records:** Students control third-party access to their USI information. By default, AHRT (or any RTO) **cannot see a student’s complete USI transcript** unless the student gives permission via the USI system. For example, if a student is enrolling and claims credits for prior study at another RTO, AHRT would ask the student to log in to their USI account and grant AHRT access to view their transcript (or the student could just provide a copy of it). This permission is entirely in the student’s hands and can be granted or revoked at any time. Likewise, if a student wants an employer or university to verify their VET qualifications, the student can permit that organization temporary access to their USI records. AHRT makes students aware of these features so they can use them to their benefit. We do not access or use student training records from the USI system unless we have a legitimate need and the student’s consent (e.g., verifying units for credit transfer, which saves the student from needing to source hard copies). This respects the student’s right to privacy and control.
- **Obligation to Obtain and Provide a USI:** Students are obligated under Commonwealth legislation to have a USI for nationally recognised training (unless exempt) and to provide that USI to their training provider. We clearly inform students of this obligation. In practical terms, this means that as part of enrolling with [RTO Name], the student must either already have a USI and

share it with us, or be willing to create one, or allow us to create one for them. This is not just a AHRT policy but a nationwide requirement since 2015. We explain to students that without a USI, we legally **cannot issue** them a formal qualification or statement of attainment. It's also explained that the USI is free to create and will not be used for purposes like tracking income or affecting visa status – it is purely for education records. By making this clear, students understand that obtaining a USI is as important as paying fees or meeting course requirements in order to get their certificate. For most students, getting a USI is a quick task; for those who might struggle (maybe due to language or technology barriers), AHRT's support staff will assist to ensure the obligation is met with minimal stress.

- **Support and Assistance:** AHRT is committed to helping students comply with USI requirements and understand the system. Our support staff can guide students step-by-step through creating a USI if needed. We provide printed and online instructions. If a student forgets their USI, we can help them retrieve it (for instance, by using the "Find USI" tool in the USI Registry System with the student's permission, or by directing them to the website's recovery options). We also address common student questions, such as: "Why do I need a USI?", "Is the USI the same as my student number?", "What happens if I lose my USI?". These are answered in our Student Handbook in plain language. The essence is that AHRT does not just impose the requirement but also educates students on it and helps them through it. This approach aligns with treating students fairly and providing good service.
- **Student Complaints and USI Issues:** If a student believes that AHRT has not correctly handled their USI or personal information (for example, if they think we failed to verify it and that caused a delay, or if they suspect their USI was misused), they have the right to lodge a complaint. AHRT's Complaints and Appeals Policy is available to all students, and a privacy or USI-related complaint would follow the same process: it can be submitted in writing, will be reviewed by management, and a response/resolution provided. We take any such complaints seriously. Additionally, students can contact the Office of the Student Identifiers Registrar for specific USI concerns (the USI website provides contact info for questions and complaints). They can also contact the Office of the Australian Information Commissioner (OAIC) if it's a privacy issue under the Privacy Act. We include these references in our Privacy Notice so students are aware of external avenues. Our aim, however, is to resolve any issues internally swiftly and satisfactorily – for instance, if a student's graduation was delayed due to a USI mishandling, we would expedite the resolution and potentially issue a formal letter for interim proof of completion if appropriate.

## TERMS AND DEFINITIONS

TERM	DEFINITION
AQF Certification Documentation	Is the set of official documents that confirms that an AQF qualification or statement of attainment has been issued to an individual.
Authenticated VET Transcript	Has the meaning given in the Student Identifiers Act 2014.
Privacy Act 1998 (Privacy Act)	Australian legislation protecting the handling of personal information about individuals. This includes the collection, use, storage and disclosure of and individuals personal information.
Standards for Registered Training Organisations (RTOs) 2015	Ensure that training delivered by RTOs meets industry requirements (as set out in training packages and accredited courses) and has integrity for employment and further study, and that RTOs operate ethically and consider the needs of both learners and industry.

Statement of Attainment	Means a statement issued to a person confirming that the person has satisfied the requirements of the unit/s of competency or accredited short course specified in the statement.
Student Identifier	Has the meaning given in the Student Identifiers Act 2014.
Student Identifiers Act	Prevents anyone other than the USI account owner from collecting, using or disclosing USI information without consent unless permitted by the Act.
USI Privacy Notice	Education or training providers applying for a USI on behalf of an individual must give them a privacy notice explaining how their personal information will be used.
Unique Student Identifier (USI)	Is a person's education number for life. It provides an online record of a person's vocational education and training (VET) undertaken in Australia. If a person is at university, TAFE or doing other nationally recognised training, they need a USI.

## Policy Updates

This Policy may change from time to time and is available on our website.

## EXCEPTIONS

Describe exceptions here.

## RELATED POLICIES AND OTHER REFERENCES

New Standards for RTO's 2025 <https://www.dewr.gov.au/standards-for-rtos>

USI Requirements <https://www.education.gov.au/unique-student-identifier-usi/usi-requirements-1-january-2023>

## ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
CEO	Authoring and updating
CFO	Publishing on the internet
Administration Manager	Ensuring all personnel are informed

CONTACTS

List contacts in the table.

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