



Skilled Up
Institute

unfold your career

RTO Number: 40471 | CRICOS Code: 03666M



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Privacy Policy 2026



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1.0 Purpose

SKILLED UP is committed to protecting the privacy of individuals and handling all personal information in a responsible and transparent manner. This policy outlines how SKILLED UP collects, uses, discloses, stores, and manages personal information in accordance with its legal and regulatory obligations.

The purpose of this policy and its associated procedures is to ensure SKILLED UP 's compliance with:

- The *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs).
The *Standards for RTOs 2025*, including the *National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025* and the *National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025*.
- The *Education Services for Overseas Students (ESOS) Act 2000* and its associated legislative framework.
- The *National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)*.
- The *Student Identifiers Act 2014 (Cth)*.

Relevant state-based legislation, including the *Privacy and Data Protection Act 2014 (Vic)*, the *Health Records Act 2001 (Vic)* and the National VET Provider Collection Data Requirements Policy

This policy forms a key part of SKILLED UP 's governance framework and its commitment to a culture of compliance and continuous improvement.



2.0 Scope

This policy applies to all personal and sensitive information collected, held, and administered by SKILLED UP. It extends to all SKILLED UP operations and covers information from any individual, including:

- Prospective, current, and past students (both domestic and overseas).
- Staff, contractors, and volunteers.
- Third-party partners, including education agents and work placement hosts.
- Industry and community stakeholders.

3.0 Definitions

- **Accepted Student:** An overseas student who has accepted an offer of a place in a course from a provider and has paid the initial tuition fees or the first instalment of fees. This term is defined under the *ESOS Act 2000*.
- **APP (Australian Privacy Principle):** The 13 principles contained in Schedule 1 of the *Privacy Act 1988* that govern the handling of personal information.
- **ASQA (Australian Skills Quality Authority):** The national regulator for Australia's vocational education and training sector.
- **CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students):** A register that lists all Australian education providers approved to offer courses to people studying in Australia on student visas.
- **ESOS (Education Services for Overseas Students):** The legislative framework governing the provision of education services to overseas students in Australia on a student visa.
- **NCVER (National Centre for Vocational Education Research):** The national professional body responsible for collecting, managing, analysing, and communicating research and statistics on the Australian VET sector.
- **Personal Information:** Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether it is recorded in a material form or not.



- **PRISMS (Provider Registration and International Students Management System):** The system used by registered providers to issue electronic Confirmation of Enrolment (eCoE) certificates and notify the Department of Home Affairs and the Department of Education of changes to an overseas student's enrolment.
- **Sensitive Information:** A subset of personal information that is given a higher level of protection under the APPs. It includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, sexual orientation, criminal record, or health, genetic, or biometric information.
- **TPS (Tuition Protection Service):** A government initiative to assist international students whose education providers are unable to fully deliver their course of study. The TPS ensures that students can either complete their studies elsewhere or receive a refund of their unspent tuition fees.
- **USI (Unique Student Identifier):** A reference number made up of numbers and letters that gives students access to their VET training records and results. The USI is a mandatory requirement for all students undertaking nationally recognised VET training in Australia.

4. Policy

Privacy Principles

- In collecting personal information, SKILLED UP complies with the requirements set out in the Privacy Act 1988, including Australian Privacy Principles 3 and 5 (in accordance with the National VET Provider Collection Data Requirements Policy clause 4.4) Privacy and Data Protection Act 2014 (Vic) and the Health Records Act 2001 (Vic, Education and Training Reform Act 2006 (Vic) and the relevant privacy legislation and regulations of Victoria in which SKILLED UP operates.
- The Victorian Government, through the Department of Education and Training (the Department)'s collection and handling of enrolment data and VSNs is authorised under the Education and Training Reform Act 2006 (Vic). The Department is also authorised to collect and handle USIs in accordance with the Student Identifiers Act 2014 (Cth) and the Student Identifiers Regulation 2014 (Cth).
- Personal information, including sensitive information, is collected from individuals in order that SKILLED UP can carry out its business functions. SKILLED UP only collects and stores information that is directly related to its business purposes and legal requirements of providing nationally recognised training and assessment.
- Sensitive information is only collected by SKILLED UP if a permitted general or health situation applies in accordance with the Privacy Act (16A, 16B) such as, if:
 - The collection of the information is required or authorised by, or under, an Australian law or a court/tribunal order.
 - It is unreasonable or impracticable to obtain the individual's consent to the collection, use or disclosure.
 - It genuinely and reasonably believes that:
 - The collection, use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety.
 - Unlawful activity, or misconduct of a serious nature, that relates to SKILLED UP's functions or activities has been, is being or may be engaged in, and the collection, use or disclosure is necessary for the entity to take appropriate action in relation to the matter.
 - The collection, use or disclosure is reasonably necessary to assist any APP entity, body



or person to locate a person who has been reported as missing.

- The collection, use or disclosure is reasonably necessary for the establishment, exercise or defense of a legal or equitable claim.
- SKILLED UP ensures each individual:
 - Knows why their information is being collected, how it will be used and who it will be disclosed to.
 - Is made aware of any legal requirement for SKILLED UP to collect the information.
 - Is able to access their personal information upon request.
 - Does not receive unwanted direct marketing.
 - Can ask for personal information that is incorrect to be corrected.
 - Can make a complaint about SKILLED UP if they consider that their personal information has been mishandled.
 - Is made aware of any consequences for not providing the information requested.
 - Whether the information is likely to be disclosed to overseas recipients, and if so, which countries such recipients are likely to be located in.
- SKILLED UP retains evidence that the student has acknowledged the following Privacy Notice and Student Declaration as part of their enrolment process: <https://www.education.gov.au/privacy-notice-and-student-declaration>

Collection of information

- Under the Data Provision Requirements 2012, SKILLED UP is required to collect personal information about students undertaking nationally recognised training and disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER). NCVER will collect, hold, use and disclose personal information in accordance with the Privacy Act 1988 (Cth), the VET Data Policy and all NCVER policies and protocols (including those published on NCVER's website at www.ncver.edu.au).
- SKILLED UP is required to provide the Department with student and training activity data. This includes personal information collected in the SKILLED UP enrolment form and unique identifiers such as the Victorian Student Number (VSN) and the Commonwealth's Unique Student Identifier (USI).

SKILLED UP provides data to the Department in accordance with the Victorian VET Student Statistical Collection Guidelines, available,

<http://www.education.vic.gov.au/training/providers/rto/Pages/datacollection.aspx>.

- In general, personal information will be collected through course application and/or enrolment forms, training records, assessment records and online forms and submissions.
- The types of personal information collected include:
 - personal and contact details
 - employment information, where relevant



- academic history
- background information collected for statistical purposes about prior education, schooling, place of birth, disabilities and so on
- training, participation and assessment information
- fees and payment information
- information required for the issuance of a USI.

1. Unique Student Identifiers (USI)

- All students participating in nationally recognised training from 1 January 2015 are required to have a Unique Student Identifier (USI) and provide it to SKILLED UP upon enrolment. Alternatively, SKILLED UP can apply for a USI on behalf of an individual.
- The Student Identifiers Act 2014 authorises the Australian Government's Student Identifiers Registrar to collect information about USI applicants. When SKILLED UP applies for a USI on behalf of a student who has authorised us to do so, we need to collect personal information about the student which will be passed on to the Student Identifiers Registrar. This will include:
 - name, including first or given name(s), middle name(s) and surname or family name
 - date of birth
 - city or town of birth
 - country of birth
 - gender
 - contact details, so the Student Identifiers Registrar can provide individuals with their USI and explain how to activate their USI account.
- To create a USI on behalf of a student, SKILLED UP will be required to verify the identity of the individual by receiving a copy of an accepted identification document. This document will only be used for the purposes of generating the USI and confirming the identity of the individual with the Registrar. Once the USI has been generated and validated, the identity documents used or collected for this purpose will be securely destroyed.
- The information provided by an individual in connection with their application for a USI:
 - is collected by the Registrar as authorised by the Student Identifiers Act 2014.



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- is collected by the Registrar for the purposes of:
 - applying for, verifying and giving a USI
 - resolving problems with a USI
 - creating authenticated vocational education and training (VET) transcripts
 - may be disclosed to:
 - Commonwealth and State/Territory government departments and agencies and statutory bodies performing functions relating to VET for:
 - the purposes of administering and auditing VET, VET providers and VET programs
 - education related policy and research purposes
 - to assist in determining eligibility for training subsidies
 - VET Regulators to enable them to perform their VET regulatory functions
 - VET Admission Bodies for the purposes of administering VET and VET programs
 - current and former Registered Training Organisations to enable them to deliver VET courses to the individual, meet their reporting obligations under the VET standards and government contracts and assist in determining eligibility for training subsidies
 - schools for the purposes of delivering VET courses to the individual and reporting on these courses
 - the National Centre for Vocational Education Research for the purpose of creating authenticated VET transcripts, resolving problems with USIs and for the collection, preparation and auditing of national VET statistics
 - researchers for education and training related research purposes
 - any other person or agency that may be authorised or required by law to access the information
 - any entity contractually engaged by the Student Identifiers Registrar to assist in the performance of his or her functions in the administration of the USI system
 - will not otherwise be disclosed without the student's consent unless authorised or required by or under law
 - The consequences to the student of not providing the Registrar with some or all their personal information are that the Registrar will not be able to issue the student with a USI, and therefore SKILLED UP will be unable to issue a qualification or statement of attainment.



2. Storage and use of information

- SKILLED UP will store all records containing personal information securely and take all reasonable security measures to protect the information collected from unauthorised access, misuse or disclosure. Personal information will be stored electronically in the student management system (Axcelerate) and in paper in certain circumstances. These files will be kept in a secure location (locked filing room where only authorized staff have access to and on Axcelerate (SMS)
- The personal information held about individuals will only be used by SKILLED UP to enable efficient student administration, report data to provide information about training opportunities, issue statements of attainment and qualifications to eligible students, and to maintain accurate and detailed records of student course participation, progress and outcomes.
- SKILLED UP may use the personal information provided by an individual to market other internal products and services to them. An individual may opt out of being contacted for marketing purposes at any time by contacting our office. Information will not be passed onto any third-party marketing companies without the prior written consent of the individual.

3. Disclosure of information

- SKILLED UP will not disclose an individual's personal information to another person or organisation unless:
 - They are aware that information of that kind is usually passed to that person or organisation.
 - The individual has given written consent.
 - SKILLED UP believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious threat to the life or health of the individual concerned or another person.
 - The disclosure is required or authorised by, or under, law.
 - The disclosure is reasonably necessary for the enforcement of criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.
- Any person or organisation to which information is disclosed is not permitted to use or disclose the information for a purpose other than for which the information was supplied to them.
- Personal information may be used or disclosed by SKILLED UP for statistical, regulatory and research purposes as per the VET Statistical guidelines and the standards of RTO 2025. SKILLED UP may disclose personal information for these purposes to third parties, including employers
 - Employers – where students are enrolled in training paid for by their employer.
 - Workplace supervisors – where the student is doing work placement hours, the supervisor may contact SKILLED UP directly to get an update on the progress of the student.
 - Commonwealth and State or Territory government departments and authorised agencies, such as the Australian Skills Quality Authority (ASQA), Skills First,
 - Victorian VET Student Statistical collection guidelines 2024
 - NCVER
 - Organisations conducting student surveys, Researchers.



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- Personal information disclosed to NCVER may be used or disclosed for the following purposes:
 - Issuing a VET Statement of Attainment or VET Qualification, and populating Authenticated VET Transcripts
 - Facilitating statistics and research relating to education, including surveys



- Understanding how the VET market operates, for policy, workforce planning and consumer information
- Administering VET, including program administration, regulation, monitoring and evaluation.
- A summary of these mandatory disclosures is provided in the table below.

Recipient	Information Typically Disclosed	Legal Basis / Purpose	Applicable Student Cohort
National Centre for Vocational Education Research (NCVER)	AVETMISS-compliant student and enrolment data.	<i>Data Provision Requirements 2012.</i> For national statistical analysis of the VET sector.	All VET Students
Department of Home Affairs & Department of Education	Student identity, Confirmation of Enrolment (CoE) status, course progress, attendance, changes to enrolment.	<i>ESOS Act 2000</i> , Section 19. To monitor and enforce student visa conditions via PRISMS.	Overseas Students on a Student Visa
Tuition Protection Service (TPS)	Student identity, contact details, course details, and tuition fee payment records.	<i>ESOS Act 2000</i> , Part 5. To provide tuition assurance in the event of a provider or student default.	Overseas Students on a Student Visa
Student Identifiers Registrar	Student identity and contact information.	<i>Student Identifiers Act 2014.</i> For the creation, verification, and management of the Unique Student Identifier.	All VET Students
Australian Skills Quality Authority (ASQA)	Any information required for regulatory functions, including performance assessments (audits) and investigations.	<i>National Vocational Education and Training Regulator Act 2011.</i> To regulate the VET sector and ensure compliance with the Standards for RTOs.	All Students
State/Territory Training Authorities (e.g., Skills Victoria)	Student and enrolment data as required by funding contracts.	State-based legislation and funding agreements. For the administration and auditing of government-funded training.	Students enrolled under specific funding contracts

Disclosure to Third Parties

SKILLED UP may disclose personal information to third parties in the following circumstances:

- **With Consent:** To an individual's employer or a work placement host, where the student has provided written consent for the disclosure of their progress and attendance information.
- **Third-Party Arrangements:** Where SKILLED UP engages a third party to provide services on its behalf (e.g., an education agent, a specialist support service, or a work placement provider), SKILLED UP will take reasonable steps to ensure the third party is bound by contractual obligations to handle personal information in a manner consistent with this policy and the APPs. These written agreements will clearly define the scope of information to be shared and the purpose of its use, reflecting the accountability requirements of the RTO Standards 2025



4. Marketing

- SKILLED UP may use personal information to provide individuals with information about our courses and services. All direct marketing communications will contain a clear and simple mechanism for the individual to opt-out of receiving future communications. SKILLED UP will not disclose personal information to external marketing companies without the prior written consent of the individual.

5. Information Quality, Storage, and Security

- SKILLED UP takes all reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure. Security measures include:
- **Electronic Security:** Role-based access controls, user log-ons, and password protection for the student management system (aXcelerate). Data transferred over the internet is protected by appropriate encryption protocols.
- **Physical Security:** Secure storage of paper-based files in locked cabinets within a controlled- access room. A clean-desk policy is enforced to protect information in the office environment.
- **Information Quality:** Procedures are in place to ensure information is recorded accurately and to allow individuals to update their details, ensuring the quality of the data held.

Data Retention and Destruction

- SKILLED UP will retain personal information only for as long as is required by law or for the purpose for which it was collected. Specific retention periods are mandated for certain records:
- **AQF Certification Documentation:** In accordance with Compliance Requirement 10 of the Standards for RTOs 2025, records of all AQF qualifications and statements of attainment issued to a student must be retained for a period of 30 years from the date the student ceases to be enrolled with SKILLED UP .
- **Written Agreements (Overseas Students):** In accordance with Standard 3 of the National Code 2018 and the ESOS Regulations 2019, copies of all written agreements with overseas students, and records of payments made under those agreements, must be retained for at least two years after the student ceases to be an accepted student.
- **Financial Records:** Financial records are retained for a minimum of seven years.
- **Secure Destruction:** When information is no longer required to be retained, it will be securely destroyed or de-identified. Paper records are shredded, and electronic hardware is sanitised before disposal.



6. Access to and Correction of Personal Information

- Individuals have a right to request access to the personal information that SKILLED UP holds about them and to request its correction.
- Requests for access or correction must be made in writing using the appropriate form (e.g., Request to Access Records Form or Amendment to Records Request Form).
- SKILLED UP will require proof of identity before granting access or making corrections to ensure the privacy of the individual is protected.
- Requests will be processed within a reasonable timeframe, typically within 10 business days.
- Access will be provided free of charge, though a reasonable fee may be charged to cover the cost of providing copies of documents.



7. Cross-Border Disclosure of Personal Information

- If SKILLED UP discloses personal information to an overseas recipient (e.g., through the use of an overseas- based education agent or a cloud service provider hosted overseas), it will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information. This will typically be achieved through enforceable contractual obligations.

8. 10. Privacy Complaints and Data Breach Management

8.1 Privacy Complaints

- An individual who believes that SKILLED UP has mishandled their personal information or breached the APPs can make a complaint. All complaints will be managed in accordance with SKILLED UP 's Complaints and Appeals Policy and Procedure. If the individual is not satisfied with the outcome of the internal process, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

8.2 Data Breach Response Plan

- In the event of a known or suspected data breach, SKILLED UP will follow a structured response plan to manage the incident effectively. The plan involves four key stages:
- Contain: Take immediate steps to contain the breach and prevent any further unauthorised access or disclosure of personal information.
- Assess: Conduct a swift and thorough assessment of the breach to understand its scope, the type of information involved, and the potential risk of serious harm to affected individuals.
- Notify: If the assessment indicates the breach is likely to result in serious harm, SKILLED UP will notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as required under the Notifiable Data Breaches (NDB) scheme.
- Review: Following the incident, SKILLED UP will conduct a comprehensive review of the cause of the breach and implement changes to policies, procedures, or systems to prevent a recurrence.



9. Responsibility

Procedure	Responsibility
Overall implementation and review of this policy.	CEO
Ensuring privacy notices are current and provided at enrolment.	RTO Manager
Managing requests for access to and correction of records.	Administration Team
Creating USIs and securely destroying identity documents.	Administration Team
Reporting overseas student data via PRISMS.	Administration Team / International Student Coordinator
Managing third-party agreements and ensuring privacy compliance.	RTO Manager
Implementing and managing the Data Breach Response Plan.	CEO / RTO Manager
Providing staff training on privacy obligations.	RTO Manager
Managing marketing opt-out requests.	CEO



Procedure

Privacy Notices

Procedure	Responsibility
A. Privacy notices Ensure the NCVET privacy notice and declaration are included on the enrolment form https://www.education.gov.au/privacy-notice-and-student-declaration	RTO Manager

Procedure	Responsibility
declaration - Ensure the Victorian Government VET Student Enrolment Privacy Notice (as per the Victorian VET Student Statistical Guidelines) is also included. - Ensure similar privacy notices and declarations are included on other forms that may be required to collect personal or sensitive information from individuals, and that these are only used in compliance with clause 1 of this policy.	

Marketing Privacy

Procedure	Responsibility
A. Email marketing Ensure there is an opt-out option on all marketing emails and correspondence sent to individuals in relation to marketing.	CEO



Privacy of USI information

Procedure	Responsibility
A. USI Authority and Identification documents - USIs are collected on the <i>Enrolment Form</i>. Where a student does not have a USI, they may request SKILLED UP to create one on their behalf. - Students who request SKILLED UP to create a USI on their behalf must sign the USI Authority Form and provide the required identification document/s as part of the enrolment application form. - A USI must not be created for a student if the USI Authority Form which includes the privacy notice has not been signed. - As soon as practicable, once the USI has been generated and validated, the personal information provided in the USI section of the Enrolment Form must be securely destroyed and not kept on file. - Refer to the <i>Student Administration Policy and Procedure</i> for detailed instructions on the generation of USIs.	Administration Team
Procedure	Responsibility
A. Request to access records - Individuals may request access to their records by using the <i>Request to Access Records Form</i>. Written requests should be sent to the head office. - Requests may be from past or current students or other individuals. It may be to access records held in a file about a student, or access to a previously issued AQF certification document – refer to the <i>AQF Certification Policy & Procedure</i>. - Upon receiving a completed form, confirm the request is valid and has been made by the individual to which the records relate – check identification documents. - Arrangements for provision of records should be made as suitable – mailing copies, providing a time for records to be viewed etc. - Arrangements should be made verbally and confirmed in writing within 10 days of receiving the request. - Where records are to be mailed, they should only be mailed to the address that is held on file for that individual, unless alternate change of address information is provided along with proof of identity – such as a driver's license or utility bill. - Where records are to be shown to an individual, the student must produce	Administration team



Procedure	Responsibility
- Do not update records if they are found to be correct already. - Advise the individual accordingly of the actions taken to follow up their request	
photo ID prior, and this should be matched to the records held on file about the individual to confirm they are only viewing their own records. Keep a note of how the records were accessed on the individual's file.	

Amendment to Records

Procedure	Responsibility
A. Request for records to be amended - Where an individual requests for incorrect records held about them to be corrected, they can do so by filling in an <i>Amendment to Records Request Form</i>. - If it is a change of address or contact details of a current student, they can use the <i>Change of Details Form</i>. - Upon receipt of a request form, consider whether the records held are correct or not. If the request is valid and records are incorrect, update records accordingly.	Administration team



Policy Version Details				
Current Version	Last Updated	Next Review Date	Author	Approved By
V4.0	16/07/2026	15/01/2027	Training Manager	CEO