



# DATA INTEGRITY AND PROVISION OF INFORMATION POLICY AND PROCEDURE

## Introduction

The Australian Academy of Commerce (AAC) is committed to maintaining the integrity, accuracy and compliance of all data related to its operations as a Registered Training Organisation (RTO) and CRICOS provider for ELICOS and VET students.

## Purpose

This policy ensures AAC meets its reporting obligations to regulatory authorities such as ASQS, NCVET and the Department of Home Affairs (DHA) in accordance with National Vocational Education and Training Regulator Act 2011 and the Education Services for Overseas Students (ESOS) Act 2000.

## Scope

This policy applies to all AAC staff, contractors, and third-party providers involved in the collection, management, and reporting of data for regulatory purposes. It encompasses data related to:

- Enrolment, progress, and outcomes of students in VET and ELICOS programs.
- Compliance reporting to regulatory bodies, including ASQA, NCVET, and the Department of Home Affairs (DHA).
- Updates to CRICOS records via PRISMS.
- Records management for organisational and reporting accuracy.

## Policy Statement

AAC ensures the accuracy, integrity, and compliance of all data reported to regulatory authorities. The policy aims to:

- Maintain secure and accurate data management systems.
- Comply with the *National Vocational Education and Training Regulator Act 2011*, the *Data Provision Requirements 2020*, and the *Education Services for Overseas Students (ESOS) Act 2000*.
- Adhere to AVETMISS standards for data collection and reporting.
- Foster accountability among staff involved in data reporting processes.

## Definitions

|   |   |
|---|---|
| <b>Australian Privacy Principles (APPs)</b> | A set of principles under the <i>Privacy Act 1988</i> governing the handling of personal information.   |
| <b>AVETMISS</b>                             | The Australian Vocational Education and Training Management Information Statistical Standard, a framework for recording and reporting VET data. |
| <b>CRICOS</b>                               | The Commonwealth Register of Institutions and Courses for Overseas Students, used to register education providers for international students.   |
| <b>Data Provision Requirements</b>          | Obligations for RTOs to collect and report accurate data to regulatory bodies.  |



|                                 |   |
|---------------------------------|---|
| <b>ELICOS</b>                   | English Language Intensive Courses for Overseas Students  |
| <b>NVR Act</b>                  | National Vocational Education and Training Regulator Act 2011   |
| <b>PRISMS</b>                   | The Provider Registration and International Student Management System used to issue electronic Confirmations of Enrolment (eCoEs)   |
| <b>Privacy Act 1988</b>         | The Privacy Act 1988 is an Australian law that regulates the handling of personal information about individuals. It includes rules about how personal information is collected, used, stored, and disclosed, as well as access and correction rights for individuals. |
| <b>Quality Indicator Data</b>   | Feedback collected from learners and employers using prescribed learner engagement and employer satisfaction questionnaires. This data provides insights into the quality of training and assessment services and is reported to ASQA annually by 30 June             |
| <b>Retention Period</b>         | The minimum period student records must be kept, as mandated by legislation.  |
| <b>Total VET Activity (TVA)</b> | Comprehensive records of all VET delivery undertaken by an RTO, reported annually to the National Centre for Vocational Education Research (NCVER).   |
| <b>VET</b>                      | Vocational Education and Training, a sector of education providing practical and skills-based training.   |

## References

- ELICOS Standards 2018
- ESOS Act 2000
- ESOS National Code 2018
- National VET Data Policy 2020
- NVR Act 2011
- Privacy Act 1988
- Standards for RTOs 2015: Specifically, Standard 7.5

## Related AAC Policies and Procedures

- Complaints and Appeals Policy and Procedure
- Course Progression and Risk Intervention Policy and Procedure
- Deferment, Suspension or Cancellation of Student Enrolment Policy and Procedure
- Fees Management and Refund Policy and Procedure
- Student Enrolment and Admissions Policy and Procedure
- Student Records Management Policy and Procedure
- Reporting International Students (PRISMS) Policy and Procedure

## Data Integrity and Provision of Information Procedure

### 1. Data Collection and Reporting Obligations

#### 1.1 Collection of Data

Student enrolment data is collected and entered into AAC's AVETMISS-compliant Student Management System during the enrolment process.

Attendance and academic progress records are updated weekly for both VET and ELICOS students.

#### 1.2 Reporting Obligations

- **Total VET Activity Data:** Comprehensive records of all Vocational Education and Training (VET) delivery are collected and reported annually to the National Centre for Vocational Education Research (NCVER) by the end of February for the previous calendar year.
- **Quality Indicator Data:** Feedback from learners and employers is collected using the prescribed learner engagement and employer satisfaction questionnaires. An annual summary report is submitted to ASQA by 30 June each year.
- **PRISMS Updates:** Timely updates of enrolments, completions, suspensions, deferrals, and withdrawals for CRICOS compliance.
- **Annual Declaration of Compliance:** AAC prepares and submits an annual declaration on compliance, affirming adherence to the *Standards for Registered Training Organisations (RTOs) 2015*.

### 2. Data Integrity and Accuracy

- AAC maintains accurate and complete records of all student enrolments, training activities, and outcomes in compliance with the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS).
- All student, staff, and organisational data is maintained in a secure, AVETMISS-compliant management system.
- All data reported to regulators must be accurate, complete and submitted within the required deadlines.
- Regular audits are conducted to ensure the accuracy and currency of data and to identify any discrepancies.

### 3. Data Security and Retention

- Data is stored securely in AAC's student management system with restricted access for authorised personnel.
- Hard copy data is stored in locked cabinets in secure areas.
- Reporting data is retained for a minimum of thirty (30) years.
- VET student assessment items are retained for six (6) months post-assessment,
- ELICOS student assessment records are retained for a minimum two (2) years.
- Data that is no longer required is disposed of securely via shredding or digital data destruction methods.



#### 4. Staff Training and Accountability

- All staff involved in data collection, management, and reporting receive training during onboarding and annual refreshers.
- Training includes AVETMISS requirements, PRISMS updates, and reporting deadlines.

#### Roles and Responsibilities

| Role                           | Responsibility  |
|--------------------------------|---|
| CEO                            | <ul style="list-style-type: none"><li>• Oversee compliance with data reporting obligations and ensure resources are allocated for accurate data management.</li></ul>   |
| Compliance Officer             | <ul style="list-style-type: none"><li>• Ensure all reports to regulatory bodies are accurate, complete, and submitted on time.</li><li>• Conduct regular audits of data systems to maintain accuracy and identify discrepancies.</li><li>• Manage staff training on data collection and reporting.</li></ul>  |
| Director of Studies            | <ul style="list-style-type: none"><li>• Ensure teaching staff record accurate attendance and academic progress data in alignment with AVETMISS standards.</li><li>• Verify the accuracy and completeness of student progress and assessment records before they are submitted for reporting.</li><li>• Liaise with the Compliance Officer to ensure AVETMISS-compliant data collection and reporting processes are upheld.</li><li>• Provide guidance to teaching staff on regulatory requirements for data collection, including PRISMS updates.</li></ul> |
| Student Services Officer (SSO) | <ul style="list-style-type: none"><li>• Maintain accurate student records in the Student Management System.</li><li>• Ensure timely updates for enrolment changes in PRISMS.</li><li>• Assist with data collection for TVA and Quality Indicator Reports.</li></ul>   |

#### Monitoring and Review

AAC's Data Integrity and Provision of Information policy is reviewed annually to ensure alignment with legislative and regulatory updates.

#### Version Control

| Version | Date     | Description        | Approved by | Approval date | Author          | Review date |
|---------|----------|--------------------|-------------|---------------|-----------------|-------------|
| V1.0    | Feb 2025 | New policy for AAC | CEO         | 17 Feb 2025   | Compliance Team | Feb 2026    |
|         |          |                    |             |               |                 |             |



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## Policy and Document Information

|                         |                    |
|-------------------------|--------------------|
| <b>Author:</b>          | Compliance Team    |
| <b>Policy owner:</b>    | Compliance Officer |
| <b>Approved by:</b>     | CEO                |
| <b>Approved date:</b>   | 17 February 2025   |
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| <b>Next review due:</b> | February 2026      |