

## Regulatory Compliance and Governance

Policies and associated procedures in this section:

- Course Transfer Policy and Associated Procedures
- Complaints and Appeals Policy and Associated Procedures
- Critical Incident Policy and Procedure
- Health and Safety Policy and Procedure
- Privacy Policy and Procedures.

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Acknowledgement of Complaint/Appeal Letter
- Complaints and Appeals Form
- Complaints and Appeals Outcome Letter
- Complaints and Appeals Register
- Release Application Form
- Release Letter
- Internal Course Transfer Application Form
- Critical Incident Action Plan Template.

The documents above can be found in the Regulatory Compliance and Governance Supporting Documents folder.

An additional document not referenced above can also be found in this folder. This is the Strategic Business Plan template that may be used as required.

## Course Transfer Policy and Associated Procedures

### ***Purpose of the policy***

This policy and associated procedures ensure that Australian College of Vocational Education and Training does not knowingly enrol an international student who wishes to transfer from another registered provider prior to the international student completing six months of their principal course.

This policy and associated procedures meet the requirements of Standard 7 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

## Policy statements

### ***Overview***

RTO will not knowingly enrol an international student who wishes to transfer from another registered provider's course prior to the student completing six months of his or her principal course except in the case of any of the following circumstances:

- the releasing registered provider or the course in which the student is enrolled has ceased to be registered;
- the releasing registered provider has had a sanction imposed on its registration by ASQA that prevents the student from continuing their principal course at that registered provider;
- the releasing registered provider has agreed to the overseas student's release and recorded the date of effect and reason for release in PRISMS;
- any government sponsor of the student considers the change to be in the student's best interest and has provided written support for that change.

### ***Assessing course transfer requests to other registered providers and circumstances where the transfer request will be granted***

International students who wish to transfer to another registered provider prior to completing six months of their principle course must complete a Withdrawal Form and attach a valid offer from another registered provider.

The outcome of the assessment will be provided within 10 working days of receipt of the form and valid enrolment offer. Where the request is granted, a Letter of Release will be provided. The Letter of Release will advise students to contact the DHA to seek advice on whether a new student visa is required. Refunds will be in accordance with RTO Fees and Refunds Policy and Procedure.

The transfer request will be granted where any of the following circumstances apply:

- The student will be reported because they are unable to achieve satisfactory course progress at the level they are studying, even after engaging with RTO intervention strategy to assist the overseas student in accordance with Standard 8 (Overseas student visa requirements).
- There is evidence of compassionate or compelling circumstances.
- RTO fails to deliver the course as outlined in the Offer Letter and Student Agreement.

- There is evidence that the student's reasonable expectations about their current course are not being met.
- There is evidence that the student was misled by Australian College of Vocational Education and Training or an education or migration agent regarding Australian College of Vocational Education and Training or its course and the course is therefore unsuitable to their needs and/or study objectives.
- An appeal (internal or external) on another matter results in a decision or recommendation to release the student.

### ***Circumstances where the transfer request will not be granted***

A transfer request will not be granted where any of the following circumstances apply:

- There are no legitimate compassionate or compelling circumstances.
- The student has not paid their fees.
- The transfer may jeopardise the student's progression through a package of courses.
- The student has recently started studying the course and the full range of support services are yet to be provided or offered to the student.
- The student is trying to avoid being reported to DHA for failure to meet the provider's attendance or academic progress requirements.

Where the request is not granted, the reasons for non-grant of the request will be communicated in writing using the Refusal of Request for Course Transfer Template. The letter will advise the student that they may access the Complaints and Appeals Policy and Procedure to appeal the decision within 20 working days of receipt of the decision.

RTO will not finalise the student's refusal status in PRISMS until the appeal process is complete and either finds in favour of RTO or until the 20-working day period in which the student can access the complaints and appeals process has passed.

### ***Internal transfer***

Australian College of Vocational Education and Training allows students to transfer to other courses offered by Australian College of Vocational Education and Training in any of the following circumstances:

- the course better meets the study capabilities of the student; and/or
- the course better meets the long-term goals of the student, whether these relate to future work, education or personal aspirations; and/or
- the student provides evidence that their reasonable expectations about the current course are not being met.

A transfer to another course within Australian College of Vocational Education and Training will not be granted in any of the following circumstances:

- The transfer may jeopardise the student's progression through a package of courses.
- The student has recently started studying the course and the full range of support services are yet to be provided or offered to the student.
- The student is trying to avoid being reported to DHA for failure to meet the provider's attendance or academic progress requirements.

International students who wish to transfer to another course must complete an *Internal Course Transfer Application Form*.

The outcome of the student's application for course transfer will be provided in writing within 10 working days of receipt of the form. Where the application is not granted, reasons for such will be provided.

### ***Record keeping***

Australian College of Vocational Education and Training will maintain all records of requests for course transfer and documentation associated with the assessment and decision regarding the request. Records will be maintained for a minimum of 2 years following the student's completion or withdrawal from their course.

## Procedures

### 1 Manage transfers in

- 1.1 On receipt of an application from a student that has not completed six months of their principal course of study, check the student on PRISMS following the information about Standard 7 in the PRISMS user guide and to ensure they have been released from the previous provider.
- 1.2 If the check confirms that the student has been released follow the usual procedures for enrolling a student.
- 1.3 If the check confirms that the student has not been released, advise the student in writing and within 3 working days of receipt of their application that it has not been approved.
- 1.4 File all documentation.

### 2 Manage transfers out

- 2.1 Where a student wishes to transfer to another provider before having completed six months of their principal course of study with Australian College of Vocational Education and Training, provide students with Application for Release form.
- 2.2 Acknowledge receipt of completed forms within 3 working days of receipt.
- 2.3 Review and assess the application provided within 10 working days of receipt. For an application to be approved, supporting documentation must demonstrate that compassionate and compelling circumstances exist.
- 2.4 Advise the student in writing of the outcome of their application, including a Letter of Release where the application is approved. If it is not approved, provide the reasons and advise the student of their right to access the complaints and appeals process.
- 2.5 Record approved releases on PRISMS following the information about Standard 7 in the PRISMS user guide.
- 2.6 Record refusals of release on PRISMS following the information about Standard 7 in the PRISMS user guide.
- 2.7 File all documentation and keep for a minimum of 2 years.

### **3 Manage internal course transfers**

- 3.1 Where a student wishes to transfer to another course within Australian College of Vocational Education and Training, provide students with Internal Course Transfer Application Form.
- 3.2 Acknowledge receipt of completed forms within 3 working days of receipt.
- 3.3 Review and assess the application provided within 10 working days of receipt. For an application to be approved, supporting documentation must demonstrate that there are appropriate reasons for transferring.
- 3.4 Advise the student in writing of the outcome of their application, including a new Offer Letter and Student Agreement where the application is approved. If it is not approved, provide the reasons and advise the student of their right to access the complaints and appeals process.
- 3.5 Advise the student in writing of any refunds due relevant to their existing course.
- 3.6 Record student course variation on PRISMS following the information on student course variation in the PRISMS user guide.
- 3.7 Record refusals of release on PRISMS following the information about Standard 7 in the PRISMS user guide.

### ***Responsibilities***

The CEO/RTO Manager is responsible for:

- managing transfers in and out
- managing internal course transfers.

The Administration and Student Support Officer is responsible for:

- filing course transfer documentation.

# Complaints and Appeals Policy and Associated Procedures

## *Purpose of the policy*

This policy and associated procedures outline Australian College of Vocational Education and Training approach to managing complaints and appeals. This is to ensure that complaints are handled in a transparent way, as well as fairly, efficiently and effectively.

This policy and associated procedures meet the requirements of Standard 6 of the Standards for RTOs 2015, as well as Standard 10 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

## Policy statements

### *Approach*

Complaints may be made against Australian College of Vocational Education and Training, its trainers and assessors and other staff, a learner of Australian College of Vocational Education and Training, as well as any third party providing services on behalf of Australian College of Vocational Education and Training including education agents.

Complaints can be in relation to any aspect of the Australian College of Vocational Education and Training's services provided.

Appeals can be made in respect of any decision made by Australian College of Vocational Education and Training. An appeal is a request for the Australian College of Vocational Education and Training's decision to be reviewed in relation to a matter, including assessment appeals.

In managing complaints, Australian College of Vocational Education and Training will ensure that the principles of natural justice and procedural fairness are adopted at every stage of the complaint process. This means reviewing each complaint or appeal in an objective and consistent manner.

RTO will appoint relevant person/s to manage complaints and appeals.

The internal complaints and appeals process will be conducted at no cost to students.

Potential causes of complaints and appeals will be investigated and corrective and preventative action will be taken in relation to complaint and appeals. Complaints and appeals will also be seen as an opportunity for improvement.

All individuals, including third parties will be informed of allegations made and will have the opportunity to present their case.

Nothing in this policy and procedure limits the rights of an individual to take action under Australia's Consumer Protection laws and it does not circumscribe an individual's rights to pursue other legal remedies.

Australian College of Vocational Education and Training encourages complainants to first seek to address the issue informally by discussing it with the person involved. However, if the person is not comfortable with this or has tried this unsuccessfully, they are to follow the procedures below.

All records of complaints and appeals will be kept by Australian College of Vocational Education and Training and entered into the complaints and appeals register.

### ***Complaints and appeals process***

Complaints and appeals are to be made as follows:

- Submit complaint or appeal in writing using the complaints and appeals form. The complaints and appeals form outlines the information that should be provided.
- Submit complaint within 30 calendar days of the incident or in the case of an appeal within 30 calendar days of the decision being made.

### ***Response to complaints and appeals***

Complaints and appeals will be responded to as follows:

- The complaint or appeal will be acknowledged in writing within 3 working days of receipt.
- Review of the complaint or appeal will commence within 5 working days of receiving the complaints.
- Complaints and appeals will be finalised as soon as practicable or within 30 calendar days.
- Where the complaint or appeal is complex and is expected to take more than 60 calendar days to process, Australian College of Vocational Education and Training will write to inform the complainant or appellant of this including the reasons for such. Following this update, regular updates will be provided of progress.
- The outcomes of the complaints and appeals process will be communicated in writing to the person making the complaint or appeals. This will also include the reasons for the outcome.

### ***Complaints and appeals handling***

Each individual involved in the complaint may have a support person of their choice present at any meetings to resolve the complaint or appeal.

An independent assessor will be identified to conduct a review of an assessment decision that is being appealed.

### ***Enrolment during a complaints process***

Domestic students' enrolment will be maintained throughout the complaints and appeals process unless the complaint is in relation to misconduct.

International students' enrolment will also be maintained throughout the internal appeals processes without notifying DESE via PRISMS of a change in enrolment status.

Additionally, for international students:

- If the appeal is against the Australian College of Vocational Education and Training's decision to report the student for unsatisfactory course progress or attendance, the student's enrolment will be maintained until the external process is completed and has supported or not supported the Australian College of Vocational Education and Training's decision to report.
- If the appeal is against the Australian College of Vocational Education and Training's decision to defer, suspend or cancel a student's enrolment due to misbehaviour, RTO will notify DESE via



PRISMS of a change to the student's enrolment after the outcome of the internal appeals process.

### ***Independent appeal process***

Where the internal process has failed to resolve the complaint or appeal, the matter will be referred to an independent mediator.

For domestic students, all associated costs are to be met by the complainant/appellant unless it is Australian College of Vocational Education and Training that made the decision to appoint the independent party.

The independent party recommended by Australian College of Vocational Education and Training for cases involving domestic students is the Resolution Institute. However, another mediator of the student's choice can be appointed.

For international students, the external mediator is the Overseas Students Ombudsman (OSO). International students can access the OSO at no cost in relation to matters that cannot be resolved through internal processes. Further information and contact details are included below.

During the mediation process, Australian College of Vocational Education and Training will cooperate in full and commits to immediately implement the decision or recommendation made by the external mediator and/or take preventative or corrective action required by the decision or recommendation.

All actions taken will be communicated in writing to students.

### ***Information about external bodies to whom complaints can be made***

Complaints can also be made to the organisations indicated below:

#### National Training Complaints Hotline:

The National Training Complaints Hotline is a national service for consumers to register complaints concerning vocational education and training. The service refers consumers to the appropriate agency/authority/jurisdiction to assist with their complaint. Access to the Hotline is through:

Phone: 13 38 73, Monday–Friday, 8am to 6pm nationally

Email: [ntch@education.gov.au](mailto:ntch@education.gov.au)

#### Australian Skills Quality Authority (ASQA):

Complainants may also complain to the RTO's registering body, Australian Skills Quality Authority (ASQA). It is important to understand that ASQA does not act as an advocate for individual students and is not responsible for resolving disputes between students and training providers. ASQA only uses information from all complaints as intelligence to inform regulatory activities. More information can be found at: <https://www.asqa.gov.au/complaints>

#### The Overseas Student Ombudsman (OSO)

International students may complain to the OSO about a range of circumstances including:

- being refused admission to a course;
- course fees and refunds;
- being refused a course transfer;

- course progress or attendance;
- cancellation of enrolment;
- accommodation or work arranged by the RTO;
- incorrect advice given by an education agent;
- taking too long in certain processes such as issuing results; and/or
- not delivering the services indicated in the Offer Letter and Student Agreement.

More information can be found at:

<http://www.ombudsman.gov.au/making-a-complaint/overseas-students#quality-of-education-provider>

## Procedures

### 1 Process complaints and appeals

- 1.1 File the complaints and appeals form received.
- 1.2 Send out an acknowledgement within 3 working days of receiving the complaint or appeal.
- 1.3 Record details of the complaint or appeal on receipt on the complaints and appeals register.
- 1.4 Determine whether the complaint or appeal can be resolved quickly and easily. If so, take immediate action to resolve the complaint or appeal and inform the student in writing of the outcome.
- 1.5 If the complaint is more complex, organise relevant staff to review the complaint and commence investigation.
- 1.6 Inform the complainant or appellant within 5 days of receiving the complaint that the investigation will commence or of the action that will occur in the case of simple complaints.
- 1.7 Conduct an investigation that includes:
  - checking of all facts and accuracy of information
  - requesting further information as required
  - organising a meeting with the complainant/appellant
  - identifying relevant corrective/preventative action
  - confirming a solution.
- 1.8 Where the matter is an appeal about an assessment decision, the investigation process will include an independent review of the assessment evidence and decision by another assessor. A relevant independent assessor should be organised.
- 1.9 The investigation will be completed within 30 days, or if it is considered that it will take longer to than 60 calendar days to process, Australian College of Vocational Education and Training will write to inform the complainant or appellant of this including the reasons for such. Following this update, regular updates will be provided of progress.
- 1.10 Where the process finds in favour of the student, organise a management meeting to discuss:
  - the process and its outcome; and
  - actions to be taken to implement the decision, including both corrective/preventative actions.
- 1.11 Following the meeting, agreed actions will be immediately implemented.
- 1.12 Update the complaints and appeals register.

- 1.13 Once the investigation is complete, the complainant or appellant will be informed in writing of the outcome using the complaints and appeals outcome letter. Where the response is in relation to a complaint, the letter will advise that the internal appeals process may also be accessed.
- 1.14 Archive the complaint or appeal documentation.

## **2 Organise external appeals**

- 2.1 In cases where the student has organised the mediator, it will be responding to the mediator's requests.
- 2.2 Cooperate with all requirements of the mediator, providing all information as required.
- 2.3 Where the mediator finds in favour of the student, organise a management meeting to discuss:
- the external process and its outcome; and
  - actions to be taken to implement the decision, including both corrective/preventative actions.
- 2.4 Following the meeting, agreed actions will be immediately implemented.
- 2.5 Advise the student of the action that Australian College of Vocational Education and Training will take in response to the external mediator's decision.
- 2.6 Where the external mediator support Australian College of Vocational Education and Training decision's regarding international students, for example, in relation to cancellation, notify DESE via PRISMS.

### ***Responsibilities***

The CEO/RTO Manager is responsible for:

- investigating complaints and appeals
- making decisions about complaints and appeals in conjunction with others.
- facilitating external decisions.

The Administration and Student Support Officer is responsible for:

- processing complaints and appeals forms
- filing all documentation.

## Critical Incident Policy and Associated Procedures

### ***Responsibilities***

This policy and associated procedures outline Australian College of Vocational Education and Training approach to managing critical incidents.

This policy and associated procedures meet the requirements of Standard 6 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

### **Policy statements**

#### ***Approach to critical incidents***

Australian College of Vocational Education and Training is committed to the health and safety of staff and students. This includes having measures in place to ensure the safety of staff, students and visitors in the event of a critical incident.

At the time of the critical incident, a critical incident team will be established to manage the critical incident. The make-up of the team will depend on staff availability at the time of the incident.

Staff will be trained in the management of critical incidents and students will also receive information about critical incidents management. This will include how to seek assistance for and report a critical incident.

All staff will receive induction into their role which will include information about health and safety, as well as critical incidents. Training and updates to information will be provided to staff on a regular basis.

Post-incident support will be provided to all persons involved in the critical incident.

Australian College of Vocational Education and Training response to critical incidents will be evaluated following each critical incident. Any improvements identified will be implemented as required.

All records of critical incidents will be filed.

## Procedures

### 1 Respond to a critical incident

- 1.1 Immediately call the emergency services on 000 in the event of death or an immediate threat to the life of a person or to property.
- 1.2 Action evacuation procedures if required.
- 1.3 Immediately report incident to a member of Australian College of Vocational Education and Training management team.
- 1.4 Establish a Critical Incident Team who will meet immediately following the incident to assess the facts of the situation, who has been affected and discuss the priorities and actions to be taken. Roles and responsibilities will be allocated.
- 1.5 Assess required actions which may include but are not limited to:
  - alerting emergency contacts
  - nominating a member of the Critical Incident Team to be a main point of contact
  - liaising with external agencies, including emergency services
  - issuing a media release advising of the situation
  - informing all staff and students of the critical incident situation
  - regularly updating all staff and students of the critical incident situation
  - organising emergency counselling for those affected
  - providing details of support services that can be provided
  - seeking legal advice
  - assisting students with insurance claims.
- 1.6 Document all actions in a critical incident action plan.
- 1.7 Implement the critical incident action plan.
- 1.8 Adjust the critical incident action plan as required.

### 2 Evaluate critical incidents

- 2.1 The Critical Incident Team formed for the specific critical incident will meet as soon as possible after the critical incident to complete all of the following actions.
- 2.2 Review the actions taken and perceived effectiveness of the response.
- 2.3 Identify any recommendations for improvement.
- 2.4 Action recommendations for improvement.

### ***Responsibilities***

The CEO/RTO Manager is responsible for coordinating the critical incident response.

All staff are responsible for calling emergency services as required in the event of a critical incident and notifying the management team.

## Health and Safety Policy and Associated Procedures

### ***Purpose of the policy***

This policy and associated procedures outline Australian College of Vocational Education and Training approach to managing health and safety of all staff, students, contractors and visitors.

This policy and associated procedures meet the requirements of Clause 8.5 of Standard 8 of the Standards for RTOs 2015 that requires Australian College of Vocational Education and Training to comply with Commonwealth, State and Territory legislation and regulatory requirements relevant to its operations, as well as Standard 6.9 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

## Policy statements

### ***Compliance with legislation***

Australian College of Vocational Education and Training meets the requirements of the WHS legislation for the State/Territory in which it is based and complies with all other relevant legislation, regulations, codes of practice, advisory and best practice standards.

### ***Organisation responsibility and commitment***

Australian College of Vocational Education and Training is committed to:

- providing a safe and healthy environment for all staff, students, contractors and visitors and others during their participation in activities with Australian College of Vocational Education and Training
- implementing effective risk management systems that are relevant and suitable for the organisation's scope of business
- promoting workplace health and safety at all times
- continuously improving performance in relation to health and safety
- encouraging active participation, cooperation and consultation with all staff and others in the promotion and development of measures to improve health and safety
- actively responding to, recording and investigating all incidents
- maintaining relevant policies, procedures, training, codes of conduct and systems to support and communicate effective health and safety practices throughout the organisation
- routinely conducting checks of the work environment to assess risks, identify hazards and identify areas for improvement
- taking immediate response to reduce the risk of identified workplace hazards
- providing appropriate induction, training, information and updates to staff, students and others on a regular basis about workplace health and safety.



### ***Staff responsibility***

All staff including managers have a responsibility to work safely, take all reasonable care for their own health and safety and always consider the health and safety of others who may be affected by their actions.

When staff are undertaking work from home or at an off-site location, the staff member is responsible for ensuring the environment they enter into is free from risk and occupational health and safety hazards.

### ***Health and safety consultation and communication***

Health and safety consultation and communication will be carried out as follows:

- Team meetings (where work health and safety is always an agenda item).
- One off meetings to discuss health and safety issues arising.
- Briefing sessions on new health and safety requirements/information.

Records of all meetings will be kept and action plans to address issues will be drawn up as required.

Follow up of actions to be taken will occur through regular team meetings.

### ***Reporting***

All staff, and others are required to report any identified workplace hazards and associated risks as soon as they become aware of them.

All staff, and others are required to report any incident that causes harm to a person during their participation in work and/or training activities with Australian College of Vocational Education and Training.

### ***Record keeping***

Appropriate records of the organisation's risk management strategy, workplace hazards and workplace injuries will be accurately maintained at all times.

## Procedures

### **1 Manage work health and safety management system**

- 1.1 Identify and action WHS issues on an ongoing basis.
- 1.2 Consult with staff on WHS issues.
- 1.3 Action WHS issues as required.
- 1.4 Provide training to staff on WHS issues as required.
- 1.5 Ensure all visitors to Australian College of Vocational Education and Training sign in and out on the Visitor Register.
- 1.6 Keep all health and safety records.

### **2 Conduct workplace inspections**

- 2.1 Inspect the workplace for hazards and risks
- 2.2 Control hazards and risks using selected control methods or report hazards and risks.

### **3 Respond to incidents**

- 3.1 Report any incidents using the Workplace Incident Form.
- 3.2 Submit Workplace Incident Form to relevant Manager.
- 3.3 In the case of an injury, the first person in attendance must contact the First Aid Officer or emergency services in the case of a serious injury.

### ***Responsibilities***

The CEO/RTO Manager is responsible for overall health and safety management and for ensuring health and safety at all times and consulting staff on WHS.

All staff are responsible for identifying and reporting health and safety issues and incidents and applying safe work practices at all times.

## Privacy Policy and Associated Procedures

### ***Purpose of the policy***

This policy and associated outline Australian College of Vocational Education and Training approach to ensuring the privacy and confidentiality of all of its staff, students and relevant others.

This policy and associated procedures meet the requirements Clauses 3.6 and 8.5 of the Standards for Registered Training Organisations 2015, Standard 3 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, as well as the National VET Regulator (Data Provision Requirements) Instrument 2020 and National VET Data Policy.

## Policy statements

### ***Privacy legislation and principles***

Australian College of Vocational Education and Training has adopted the Australian Privacy Principles contained in the Privacy Act 1988.

### ***Collection of personal information***

Australian College of Vocational Education and Training collects personal information only for the purposes of its business operations.

Australian College of Vocational Education and Training also collects personal information about students undertaking nationally recognised training and discloses this information to the National Centre for Vocational Education Research Ltd (NCVER).

Australian College of Vocational Education and Training provides information to staff and students about why their information is being collected and how it will be used, as well as their ability to access information held about them.

Both staff and students have the right to request that their personal information be changed.

A Privacy Notice is included in the Application for Enrolment Form and Offer Letter and Student Agreement.

Staff contracts refer to privacy rights and obligations.

All personal information is kept secure and confidential at all times.

All persons have the right to make a complaint or appeal in relation to privacy matters as per RTO Complaints and Appeals Policy and Procedures.

### ***Sensitive information***

Australian College of Vocational Education and Training also collects sensitive information. Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will only be used by Australian College of Vocational Education and Training:

- for the primary purpose for which it was obtained
- for a secondary purpose that is directly related to the primary purpose
- with an individual's consent; or where required or authorised by law.

## Procedures

### **1 Manage personal information**

- 1.1 Process all personal information according to the relevant procedures.
- 1.2 Archive personal information according to the relevant procedures.

### **2 Provide access to records**

- 2.1 Review written requests for access to records.
- 2.2 Arrange for the individual to view their personal information as requested.
- 2.3 Update personal information according to any requests made.
- 2.4 Keep all documentation relating to access to records.

### ***Responsibilities***

The RTO Manager is responsible for ensuring privacy at all times and consulting staff on WHS.

The Administration and Student Support Officer is responsible for processing all personal information and providing access to records as required.