- PROCEDURE -

Verification of Identity

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Procedure Statement

TAFE SA is committed to a student- ~~centered~~centred approach to identity verification, ensuring that the process is accessible, respectful, and transparent while maintaining the highest standards of security and data integrity.

TAFE SA will ensure that all applicants, students, alumni and third parties are identified at each point of interaction with TAFE SA to ensure the protection of personal information and the accuracy of records.

This procedure provides the operational steps for verifying identity from initial application and onboarding, through training, and post-training interactions. These processes ensure that data integrity is maintained and that personal information is only released to authorised individuals.

This procedure supports and should be read in conjunction with the TAFE SA Verification of Identity Policy, TAFE SA Personal Information Collection and Retention Procedure, and TAFE SA Privacy Policy.

Scope

This procedure applies to all TAFE SA staff including employees engaged as contractors, volunteers, hourly paid instructors (HPIs) and casuals. This procedure applies to all domestic and international students entering, undertaking, or have completed training and/or education at TAFE SA. This includes school student, apprentices and Trainees, Adult Migrant English Language Program students and short course students.

This procedure applies to any third-party agency or advocate (possessing approved third-party consent) that TAFE SA may engage with during the course of conducting routine business activities on behalf of a student, including but not limited to parent/guardians, other trusted government agencies (agencies of State or Commonwealth Governments, such as Skills SA, South Australian ~~POL~~Police (SAPOL), Australian Federal Police (AFP), Unique Student Identifier Registrar), employers, Group Training Organisations, Australian Apprentice Support Network providers, and Vocational Education Training Coordinators.
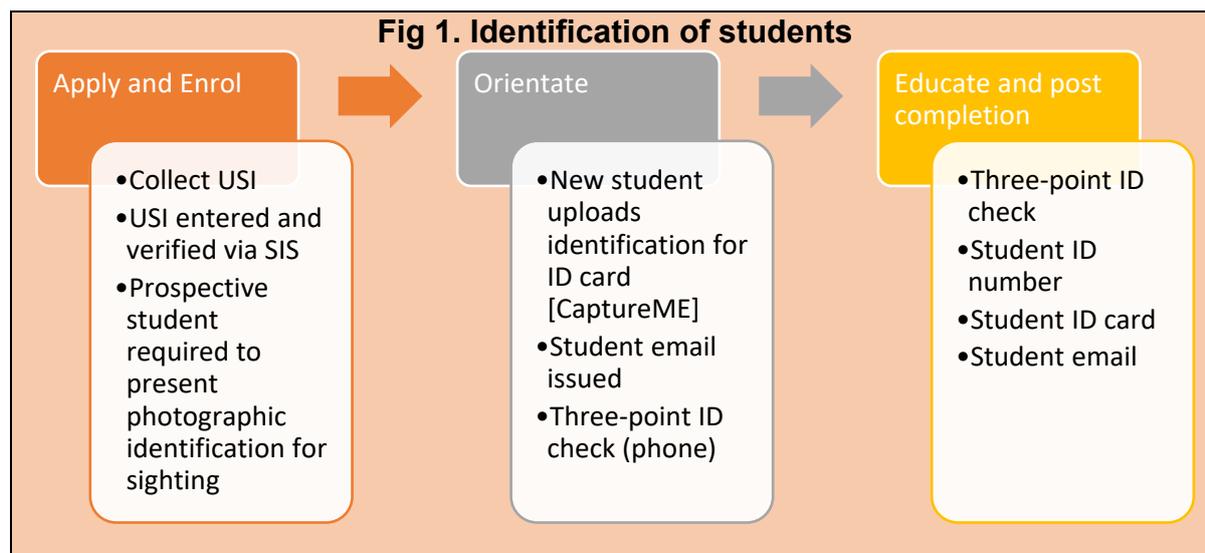
Procedure Detail

All TAFE SA staff must ensure that a student is appropriately identified before accessing a service or releasing any personal information, this will include contact received in person, by phone or by other correspondence.

A customer is defined as any external party to TAFE SA.

1. Domestic and international students entering, undertaking, or have completed training and/or education at TAFE SA.

2. Any third-party agency or advocate (possessing approved third-party consent) that TAFE SA may engage with during the course of conducting routine business activities on behalf of a student, including but not limited to parent/guardians, other government agencies, employers or VET Coordinators in schools.

Student Identity Verification

Fig 1. Identification of students

Apply and Enrol	Orientate	Educate and post completion
• Collect USI • USI entered and verified via SIS • Prospective student required to present photographic identification for sighting	• New student uploads identification for ID card [CaptureME] • Student email issued • Three-point ID check (phone)	• Three-point ID check • Student ID number • Student ID card • Student email

TAFE SA will verify student identity for applicants pursuant to figure 1.

The Australian Government Unique Student Identifier (USI) is created with the Australian Government's Document Verification Service, or the MyGovID application, whereby the USI account owner has their identity verified by pre-existing forms of government issued identification.

International students are not eligible to obtain a USI at application and will not require to have a USI until enrolment, when they arrive to Australia.

1. Onboarding identity verification:

a) TAFE SA is required to request, record, verify, and report a USI for each applicant pursuant with the requirements under the *Student Identifiers Act 2014, and Standards for Registered Training Organisations (RTOs) 2015 2025*.

b) TAFE SA requires the South Australian Tertiary Admissions Centre (SATAC) to request and record the USI for each applicant on behalf of TAFE SA.

c) During the TAFE SA enrolment process a student USI will be entered in the Student Information System (SIS).

d) The USI recorded in the SIS is verified against USI Registry via a system-to-system connection, to ensure the USI is correct and valid.

e) Where an applicant is exempted from requiring a USI, TAFE SA will accept that identification has been verified when provided through a trusted government source, including but not limited to: SAPOL, AFP, Commonwealth USI Registrar or state or commonwealth agency.

f) In circumstances where an individual cannot create their own USI for example, they cannot access the internet, live remotely, or do not hold any form of photographic identification,. In these circumstances, TAFE SA will support the individual to create/recover their USI. Once resolved, TAFE SA will record, verify, and report the USI that is stored within the Student Information System or StudyLink.

g) All enrolled students will be issued with a TAFE SA Student ID number and receive information relating to commencement of their study.

h) A TAFE SA Student ID card will be provided using the Capture ME software service.

i) TAFE SA will not release a Student ID card or a qualification, or statement of attainment to the individual, unless a USI has been provided and verified.

j) Through Capture ME, an enrolled student is also required to verify their identification by providing appropriate photographic evidence. For the purpose of a Skills SA sSubsidised place, this evidence is required to validate the enrolled student resides in South Australia.

k) Upon issuing a Student ID card to a student, TAFE SA will confirm that a verified USI has been entered into SIS, photographic identification submitted through Capture ME, and ensure the identity is consistent in the TAFE SA records.

l) TAFE SA employees will undertake a further check and update the Student Information System records to confirm verification of identification by adding a note to the Additional Identification (SPAIDEN) page on the Student Information System confirming evidence submitted through Capture ME.

⚐ There is no requirement to retain physical records in relation to verification or identification documentation, and to do so would create a risk to TAFE SA (refer section Risk and Controls).

m) If a USI has not been recorded and verified, the enrolled student will still be proactively supported before a Student ID card is created.

n) The enrolled student can be assisted to establish their USI on campus or by phone support (if studying externally or at a remote location) where possible. A three-point ID check will be completed before commencing this service.

🖹   Ensuring verification of identification is recorded on the ~~Student Information System~~SIS is an important requirement by Skills SA for all students with subsidised training accounts to ensure compliance.

2. During and Post Training

When physically attending a campus:

a) All enrolled students are required to carry a valid form of personal identification (for example, a Student ID card) when they attend campus, and at all times.

b) Sighting of personal identification will be requested when accessing a TAFE SA service or requesting personal information.

c) All TAFE SA staff must ensure that students are appropriately identified before releasing any personal information, this will include requests received in person, by phone or by other correspondence (e.g. email, web enquiry form or online chat).

d) TAFE SA may also request to sight a Student ID card, at commencement of a new class or ahead of an assessment activity. This expectation is made clear to students during orientation. When engaging with an individual by correspondence, the use of an official student ID and student email account are considered points of identification.

e) Where a student is not able to present a valid Student ID card, their Student ID number or other photographic evidence at the point of enquiry, then an employee can complete a three-point ID check using information stored on the ~~Student Information System~~SIS or MyCustomer.

f) If personal identification details do not match an individual, and a three-point ID check is unsuccessful; the individual must not be provided any information pertaining to a student record.

When contact is made via telephone or other medium:

a) All TAFE SA staff must ensure that students are appropriately identified before releasing any personal information. This will include by phone or by other correspondence (e.g., email, web enquiry form or online chat).

b) If the requester is an identified approved third-party, TAFE SA staff will be required to confirm the individual identified has authorisation to enquire about a student.

c) If personal identification details do not match an individual, and a three-point ID check is unsuccessful; the individual must not be provided any information pertaining to a student record.

d) When contact is made by a trusted third party (government agency), any requests relating to student information must be received by email from the trusted agency's email server.

3. Three-point identity verification

Direct engagement with customers by phone or written correspondence requires staff verification of student identity by completion of a three-point ID check and in person, when an enrolled student is not able to present their Student ID card or other photographic evidence at the point of enquiry.

Three-point ID checks are standard requirement before releasing any personal information across many government agencies and checks will be completed against verified enrolment data (for example, information contained in the ~~Student Information System~~SIS, MyCustomer and/or a third-party agent listing i.e. school or employer contacts as required).

4. Third-party identity verification

Unless verified by a pre-authorised and approved list of stakeholders on TAFE SA record, when engaging directly with a third-party agent on behalf of a student, a TAFE SA employee will be required to verify identification through a three-point ~~identification~~ID check and have received consent in writing from the customer to engage with the third party *prior* to accessing a service or release of any personal information. These steps are in accordance with the TAFE SA Privacy Policy and State Government Information Privacy Principles.

TAFE SA requires a copy of evidence that verifies consent from the student to be saved on the ~~Student Information System~~SIS record under Additional Identification (SPAIDEN).

Consent may be provided in writing from the authorised student email account and/or by completion of the TAFE SA Student Consent to Release Personal Information (TAFESIS029) form.

If verbal consent is received from a student during a phone call, for example at the point of a phone enquiry then that consent is only valid for the duration of that conversation; until written consent has been received.

Risks and controls

Risk	Control
Enrolled student does not provide a USI	Student ID card, qualification or statement of attainment will be withheld.

Risk	Control
A three-point identity check is not completed	Monitoring and training through internal quality assurance team and/or responsible Team Leaders
CaptureME or Identity One is an external service provider	Cybersecurity / third party database risk; risk mitigation cybersecurity policies established
The student does not have a Student ID card to access a service or personal information	A TAFE SA employee can confirm personal identification by completion of a three-point ID check or sighting other photographic identification.
Printing of student identification documents	Printing/scanning and saving student identification documents are not required to be retained/stored as all verification checks are verbal or by sight and notated onto SIS - SPAIDEN. Remove need for completion of hard copy forms.

Roles and Responsibilities

Position	Responsibility
Admissions, Onboarding and Enrolment employees	Support a prospective student to enrol into a TAFE SA course and will proactively ensure a USI is provided at the time of enrolment.
All PS Act Administrative Support Officers and Professional Officers (General)	Ensure compliance with the Verification of Student Identity policy and procedure and associated policies, procedures and local level guidelines.
Data Services Team	Responsible for general awareness of the Verification of Student Identity policy and procedure across TAFE SA. Provide advice and support to TAFE SA employees around Data Integrity, Student Information System and Unique Student Identifier.
Director, Student Experience	Responsible for ensuring timely review and updates of the Verification of Student Identity policy and procedure for approval. Responsible for establishment of Verification of Student Identity local level guidelines.

Executive Director Students, Strategic Planning and Policy Community and Engagement	Responsible for the establishment of the Verification of Student Identity policy and procedure; and TAFE SA compliance with State Government policy in relation to *Student Identifiers Act 2014* and PC 012 – Information Privacy Principles (IPPS) Instruction (refer Associated Documents and References).
ICT Service Team	Helpdesk staff responsible for identifying the need for and enacting three-point ID check when providing IT support to a student.
Lecturer/s or HPI	Communication with student/s through an authorised student email account; request to sight Student ID card at the commencement of a course and as needed throughout the delivery of training.
Quality Assurance Leads, Student Experience	Responsible for general awareness of the Verification of Student Identity policy and procedure across TAFE SA, monitoring and training to Student Experience employees.
Student Hub employees	Support enrolled students with creation of Student ID card; ensuring a verified USI has been received and photographic identification has been provided before releasing a Student ID card.

Definitions

Term	Definition
Valid photographic ID	An official and valid form of identification issued by a government authority, including but not limited to: > Australian/Overseas passport > Australian drivers' licence or learner's permit > Government proof of age card > Secondary School Student Card > South Australian or Federal Police Officer photo identity card > Immigration card > Correctional Services photo ID card Other valid proof of identity document with photo.
CaptureME [Identity One]	The programme where a photograph is taken or uploaded by an enrolled student and then transferred to Identity One which issues the ID cards. Identity One confidentially retains student identification. CaptureME is administered by UniCard (an external service provider).
Enrolment	Completion of requirements by which a student is admitted to a qualification of one or more units of competency, course, or program with TAFE SA. A reference to enrolment can also be concurrently read as a reference to registration.

Personal Information	Has the same meaning as in the *Privacy Act 1988*; information or an opinion about an identified individual, or an individual who is reasonably identifiable.
Student/s	Any customer that is enrolled and accessing a product or service from TAFE SA. For the purpose of this policy a student can mean a prospective, current or past student of TAFE SA.
Third-party agent	A third-party agent acts on behalf of or has professional interest in the student's learning. A third-party agent is known to TAFE SA and has pre-authorisation to enquire as to a student record. A third-party agent can include: > Advocate > Parent/Guardian > Employer > VET Coordinator > School staff member.
Three-point ID check	This can be done with any three identifiers that include: a student's full name, date of birth, address, USI, student email or student ID number. This is done during any verbal interaction with a customer and helps to reduce the risk of providing personal information to the wrong person. This can be done with any **three** identifiers that includelisted below: > A student's full name (or preferred first name identified in the student information system and legal surname) > Date of birth > Full Address > Contact phone number > Contact email address > Student ID number > SATAC Reference Number > USI A staff member may request more than three identifiers listed above, if they have reason to believe the student cannot be identified correctly from the information already provided. This is done during any verbal interaction with a customer and helps to reduce the risk of providing personal information to the wrong person.
Unique Student Identifier (USI)	Unique Student Identifier means a unique combination of letters, numbers or symbols that creates a secure online record of a new or continuing student. The national student identifier is issued in accordance with the *Student Identifiers Act 2014*.

Associated Documents and References

Document Type/ Number	Document/Reference Title
Code of Ethics	*Code of Ethics for the South Australian Public Sector*
Legislation	*Student Identifiers Act 2014*
Legislation	*Privacy Act 1998*
Legislation	*Standards for Registered Training Organisations ~~2015~~2025*
Legislation	*State Records Act 1997*
PC012	*PC 012 – Information Privacy Principles (IPPS) Instruction*
PPMF/TAFESA/1093	Privacy Policy
PPMF/TAFESA/1230	Personal Information Collection and Retention Procedure
PPMF/TAFESA/1244	Verification of Student Identity Policy
PPMF/TAFESA/1097	Issuance Policy
PPMF/TAFESA/1095	Issuance Procedure

Document Control

TAFE SA procedures must undertake a full review process, including relevant stakeholder consultation and approval, at least every two years from the date of approval. Reviews may be actioned earlier according to related policy or procedure updates and/or reviews, strategic priorities, reforms, legislative or regulatory changes, or feedback received.

Approved by			
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Responsible Unit		Student ~~and Community Engagement~~Experience	

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