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NATIONAL TRAINING PTY. LTD.



GOVERNANCE



**National  
Training**

# PRIVACY

POLICY  
AND  
PROCEDURE

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### **Policy Statement**

National Training (NT) is committed to protecting the privacy of personal and sensitive information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and all relevant regulatory requirements. NT ensures that personal information collected, stored and disclosed is handled transparently, securely and only for lawful purposes.

This policy outlines how NT manages personal information, including student and staff data and provides clear procedures for access, correction and complaint resolution. NT's commitment to privacy supports public confidence, ethical practice and compliance with the Outcome Standards for RTOs 2025, particularly those relating to governance, communication and recordkeeping.

### **Purpose**

This policy establishes NT's approach to privacy and information handling. It sets out the principles and procedures to ensure compliance with privacy legislation and guides staff in managing personal information responsibly. The policy supports individuals' rights to access, correct and control their personal data.

### **Scope**

This policy applies to all staff, students, contractors and third parties who collect, access or manage personal information on behalf of National Training. It applies to both hardcopy and electronic records maintained in all systems and locations used by NT.

### **Responsibilities**

#### *Chief Executive Officer (CEO)*

- Oversees compliance with privacy legislation and approves this policy.
- Ensures complaints or breaches are managed and reported where necessary.
- Ensures staff are aware of their privacy obligations.
- Responds to escalated privacy complaints or data breaches.

- Manages day-to-day privacy requests, including access and correction.
- Maintains privacy-related documentation and supports secure information practices.

### *All Staff*

- Must comply with NT's privacy procedures when handling any personal information.
- Must report any suspected data breaches or unauthorised access immediately.
- Ensure all personal information is stored securely and only accessed when necessary.

## **Procedure**

This procedure outlines how National Training manages the collection, access, correction, use and disclosure of personal information. It ensures all privacy-related actions are compliant with legislation and are handled efficiently and respectfully.

### **1. Collection of Personal Information**

NT only collects personal information that is necessary for its operations, such as student enrolments, staff employment and regulatory reporting. Collection must be lawful, fair and where possible, directly from the individual concerned.

- Inform individuals at the point of collection why their data is being collected.
- Use enrolment forms, employment records and authorised systems to collect data.
- Ensure consent is obtained where required, particularly for sensitive information.

### **2. Use and Disclosure of Information**

Personal information must only be used or disclosed for the purpose for which it was collected, unless authorised by law or with the individual's consent.

- Use information only for legitimate business, enrolment or employment purposes.
- Disclose only to authorised bodies (e.g. ASQA, NCVER, DET) as required.
- Do not share personal data with third parties for marketing without explicit consent.

### 3. Access and Correction

Individuals have the right to request access to their personal information and to request corrections if it is inaccurate or outdated.

- Direct all requests to the Chief Executive Officer in writing.
- Verify the identity of the requester before releasing information.
- Respond within 10 business days and make reasonable efforts to correct data.
- Document all requests and actions taken.

### 4. Data Security

NT takes reasonable steps to protect personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

- Store physical files in secure, restricted-access locations.
- Use password protection and secure platforms for electronic storage.
- Destroy or de-identify information when it is no longer required.
- Retain records for a minimum of 7 years or longer if required by law or funding contracts. (Note: Student Records including SOA and Qualifications must be retained for 30 years)

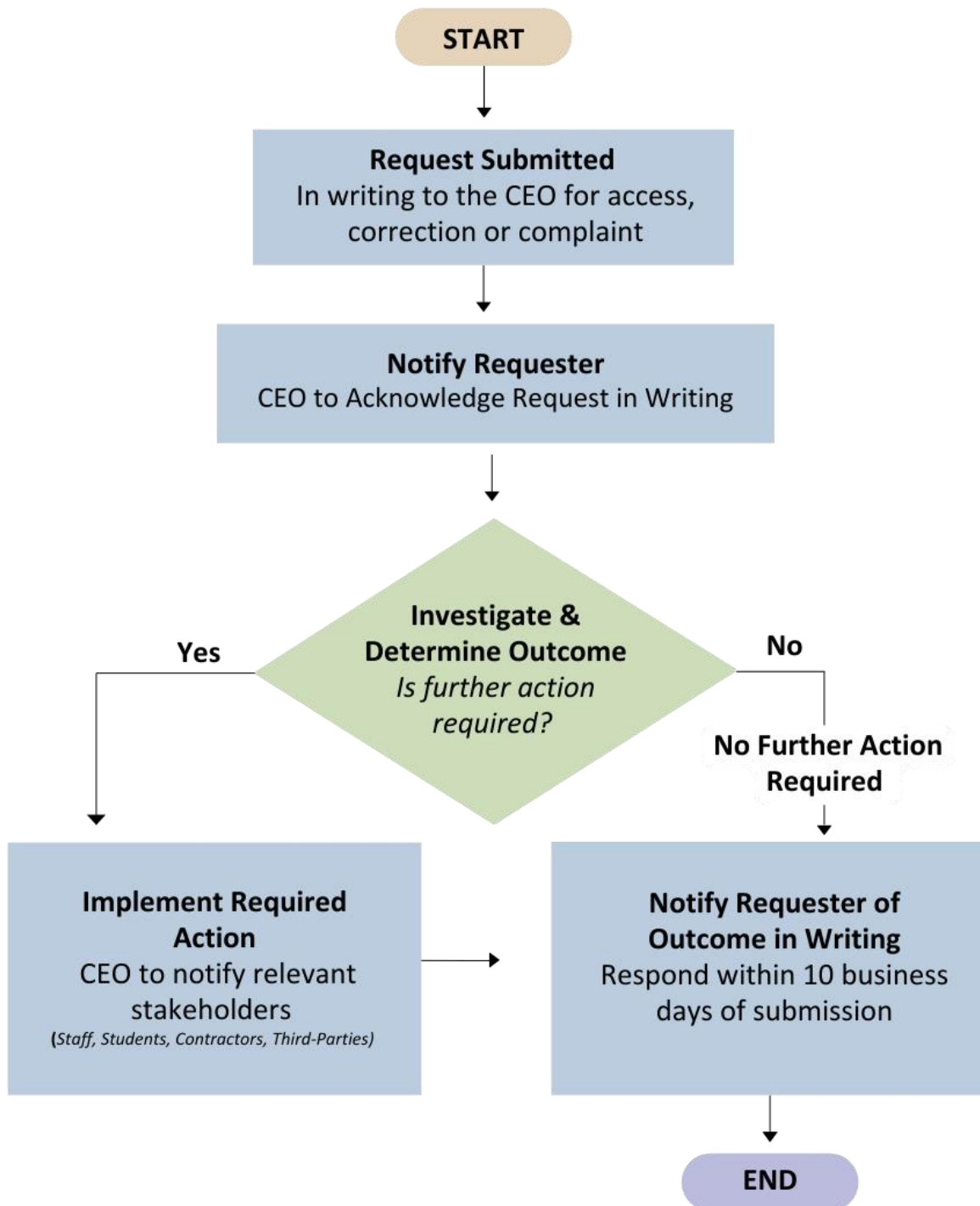
### 5. Privacy Complaints

If an individual believes NT has breached their privacy, they may lodge a complaint.

- Complaints should be submitted in writing to the CEO.
- The CEO will investigate and respond within 10 business days.
- If unresolved, the complainant may escalate to the Office of the Australian Information Commissioner (OAIC).

PROCEDURE FLOWCHART

## PRIVACY REQUESTS FLOWCHART



## Definitions

- **Personal Information:** Information or an opinion that identifies or could identify an individual.
- **Sensitive Information:** Information about an individual's racial or ethnic origin, health, sexual orientation, political views or criminal record.
- **Australian Privacy Principles (APPs):** The 13 principles that govern the handling of personal information under the Privacy Act 1988.
- **Consent:** Voluntary agreement by an individual for NT to collect, use or disclose their personal information.
- **Access Request:** A formal request from an individual to view or obtain a copy of their personal information held by NT.
- **Correction Request:** A request to update or amend inaccurate or incomplete personal information.

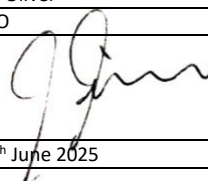
## Document History

| Revision | Date                      | Description of modifications                                                                      |
|----------|---------------------------|---------------------------------------------------------------------------------------------------|
| 1.0      | 1 <sup>st</sup> July 2025 | Original<br>Implemented to align to 2025 RTO Outcome Standards<br>Replacing <i>Privacy Policy</i> |

## Document Details

|                                |                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Document Name:                 | Privacy Policy & Procedure                                                                                                                                                                                                                                                                                                                                        |
| Policy Code:                   | G6                                                                                                                                                                                                                                                                                                                                                                |
| Department:                    | Governance                                                                                                                                                                                                                                                                                                                                                        |
| Circulation:                   | All Staff                                                                                                                                                                                                                                                                                                                                                         |
| Location:                      | Dropbox                                                                                                                                                                                                                                                                                                                                                           |
| Review Cycle:                  | This policy is reviewed annually to ensure alignment with evolving regulatory requirements and NT's business structure.                                                                                                                                                                                                                                           |
| Policy Drivers:                | Outcome Standards for RTOs 2025: <ul style="list-style-type: none"> <li>• <b>Standard 4.1:</b> Integrity and accountability in governance</li> <li>• <b>Standard 4.3:</b> Risk identification and management</li> </ul> Compliance Standards for NVR Registered Training Organisations 2025: 20<br>Privacy Act 1988 (Cth)<br>Australian Privacy Principles (APPs) |
| Related Policy and Procedures: | <ul style="list-style-type: none"> <li>• G1 – Corporate Governance Policy &amp; Procedure</li> <li>• G2 – Risk Management Policy &amp; Procedure</li> <li>• G15 – Records and Document Management Policy &amp; Procedure</li> </ul>                                                                                                                               |

## Approval

|                       |                                                                                     |
|-----------------------|-------------------------------------------------------------------------------------|
| Document Approved by: | Ian Oliver                                                                          |
| Position              | CEO                                                                                 |
| Signature             |  |
| Date                  | 30 <sup>th</sup> June 2025                                                          |