



# TRAINING & PERSONNEL AUSTRALIA

ABN: 56 234 187 541

24/7 Ph: 1300 TOP JOB / RTO# 41096



## PRIVACY POLICY

### Purpose

Training and Personnel Australia (TPA) is committed to protecting the privacy, confidentiality, integrity and security of personal information collected, used, stored and disclosed in the course of its operations. This policy outlines how TPA manages personal information in accordance with the Privacy Act 1988, Australian Privacy Principles (APPs) and applicable legislative, regulatory and contractual obligations.

### Scope

*This policy applies to:*

- Learners and prospective learners
- Employees
- Trainers and Assessors
- Contractors and third-party providers
- Visitors
- Stakeholders and clients

### Policy Statement

*TPA is committed to:*

- Collecting only information necessary to provide training, assessment and support services.
- Managing personal information lawfully, fairly and transparently.
- Protecting personal information from misuse, loss, unauthorised access, disclosure or modification.
- Ensuring information is accurate, current and secure.
- Respecting the privacy rights of all individuals.
- Maintaining confidentiality wherever reasonably practicable.
- Providing access to personal information in accordance with legislative requirements.

TPA recognises that privacy protection is essential to maintaining trust, compliance and professional standards.

### Personal Information

Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable.

*Examples may include:*

- Name
- Address
- Telephone number
- Email address
- Date of birth
- Emergency contact details
- Employment details
- Student records
- Assessment records
- Unique Student Identifier (USI)
- Identification documents
- Training and assessment outcomes

### Sensitive Information

*Sensitive information may include:*

- Health information
- Disability information
- Cultural background information

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- Information relating to support needs
- Information relating to complaints, incidents or investigations
- Information protected under legislation

## Collection of Information

*TPA collects personal information only where it is reasonably necessary to:*

- Process enquiries and enrolments;
- Deliver training and assessment services;
- Verify identity;
- Maintain student records;
- Issue qualifications and statements of attainment;
- Manage employment and contractor arrangements;
- Provide learner support services;
- Conduct quality assurance activities;
- Meet legislative and regulatory obligations; and
- Comply with contractual requirements.

*Information may be collected through:*

- Enrolment forms;
- Applications;
- Emails;
- Telephone conversations;
- Online systems;
- Assessment activities;
- Student management systems;
- Training records;
- Employment records; and
- Direct communication with individuals.

## Use and Disclosure of Information

TPA will only use or disclose personal information for the purpose for which it was collected unless:

- The individual has provided consent;
- Disclosure is required or authorised by law;
- Disclosure is required by a regulatory authority;
- Disclosure is required under contractual or third-party obligations; or
- Disclosure is necessary to protect health, safety or wellbeing.

*Information may be disclosed to:*

- Government departments;
- Regulatory bodies;
- Funding authorities;
- Partner organisations;
- Relevant third-party stakeholders;
- Contractors engaged to support training delivery;
- Emergency services where required by law or safety obligations.

## Student Information

*By enrolling with TPA, learners acknowledge that personal information may be collected, used and disclosed for purposes including:*

- Training and assessment delivery;

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- Student administration;
- Regulatory reporting;
- Funding and compliance requirements;
- Issuing qualifications and statements of attainment;
- Student support services;
- Quality assurance and continuous improvement activities.

## Unique Student Identifier (USI)

TPA is required by law to collect, verify, maintain and report Unique Student Identifier (USI) information in accordance with applicable legislation and reporting requirements.

TPA will not use or disclose USI information for purposes unrelated to its legal obligations.

## Storage and Security of Information

*TPA will take reasonable steps to protect personal information through:*

- Secure electronic systems;
- Password protection;
- Controlled access permissions;
- Secure storage of physical records;
- Staff confidentiality obligations;
- Secure disposal of records;
- Data backup processes; and
- Cybersecurity controls appropriate to the size and nature of the organisation.

Access to personal information is restricted to authorised personnel with a legitimate business need.

## Access and Correction of Information

Individuals may request access to their personal information held by TPA.

*TPA will:*

- Respond to requests within a reasonable timeframe;
- Provide access where legally permitted;
- Allow correction of inaccurate, incomplete or outdated information; and
- Provide reasons where access or correction cannot be granted.

No fee will be charged for reasonable requests to access personal information.

## Data Breach Management

*Any actual or suspected:*

- Privacy breach;
- Data breach;
- Cybersecurity incident;
- Loss of records;
- Unauthorised access;
- Unauthorised disclosure of personal information

must be reported immediately to management.

TPA will investigate privacy incidents and implement corrective actions where required.

Where required by law, affected individuals and relevant authorities will be notified.

## Privacy and Workplace Health and Safety

TPA recognises that privacy obligations extend to workplace health and safety matters.

*Information relating to:*

- Hazards;
- Incidents;

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- Injuries;
- Investigations;
- Psychosocial hazards;
- Complaints;
- Student welfare matters; and
- Employee wellbeing matters

will be managed confidentially and only disclosed where necessary to manage the matter appropriately or where required by law.

## Privacy Complaints

*Any person who believes their privacy has been breached may lodge a complaint through:*

- A Manager;
- The CEO;
- Complaints Form;
- Complaints and Appeals Process; or
- Issue Resolution and Reporting Process.

Privacy complaints will be investigated promptly, fairly and confidentially. Where appropriate, corrective actions will be implemented and recorded.

## Roles and Responsibilities

### CEO / Management

*Responsible for:*

- Ensuring compliance with privacy obligations.
- Maintaining privacy systems and controls.
- Managing privacy complaints and incidents.
- Monitoring compliance and continuous improvement.

### Employees, Trainers and Assessors

*Responsible for:*

- Protecting personal information.
- Maintaining confidentiality.
- Reporting privacy breaches.
- Following organisational privacy requirements.

### Contractors and Third-Party Providers

*Responsible for:*

- Maintaining confidentiality.
- Protecting personal information.
- Complying with contractual privacy obligations.
- Reporting actual or suspected privacy breaches.

### Records Management

All personal information and privacy-related records will be maintained in accordance with the Records Management Policy.

Records will be securely stored, retained and disposed of in accordance with legislative and organisational requirements.

### Legislative and Regulatory References

- Standards for Registered Training Organisations (RTOs) 2025
- National Vocational Education and Training Regulator Act 2011
- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)

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- Work Health and Safety Act 2011 (Qld)
- Work Health and Safety Regulation 2011 (Qld)
- Anti-Discrimination Act 1991 (Qld)
- Applicable Queensland Codes of Practice
- Relevant contractual and third-party obligations

## Related Documents

- Access and Equity Policy
- Complaints and Appeals Policy
- Student Code of Conduct
- WHS Policy
- WHS Procedure
- Hazard Identification and Reporting Procedure
- Incident Reporting and Investigation Procedure
- Issue Resolution and Reporting Process
- Records Management Policy
- Continuous Improvement Policy

## Monitoring and Continuous Improvement

TPA will regularly review privacy practices, systems and controls to ensure ongoing compliance and effectiveness. Privacy incidents, complaints, audit findings and legislative changes will be reviewed through management review and continuous improvement processes.

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