



TRAINING & PERSONNEL AUSTRALIA

ABN: 56 234 187 541

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



PRIVACY POLICY AND PROCEDURE

Maritime and General Programs – Career Start, Career Boost & Fee-for-Service

1. Applicable Standards, Contracts and Legislation

This Privacy Policy and Procedure supports compliance with the following:

- 2025 Standards for Registered Training Organisations – Outcome Standards relating to information provision, records management and the fair treatment and protection of students (including privacy-related obligations under Quality Area 2).
- Vocational Education and Training Skills Assure Supplier Agreement (SAS Agreement) 2025–2028 and Skills Assure Supplier Policy 2025–2028 – including Performance Standard 1 requirements for the provision of the Privacy Notice before or at enrolment and retention of evidence.
- National VET Data Policy (including the mandatory VET Privacy Notice and Student Declaration)
- Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs)
- Student Identifiers Act 2014 (USI collection, verification and handling)
- National Vocational Education and Training Regulator Act 2011 (NCVER data reporting obligations)
- Career Start Program Policy 2025–28 and Career Boost Program Policy 2025–28
- QMS Pillars SRE3 / SJ3 – Privacy & Confidentiality / Information Provision / Records Management.

TPA retains evidence that the mandatory Privacy Notice has been provided as part of the enrolment process.

2. Purpose

Training & 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 Privacy Policy and Procedure outlines how TPA manages personal information in accordance with the Privacy Act 1988 (including the Australian Privacy Principles), the National VET Data Policy, the 2025 Standards for Registered Training Organisations, the Skills Assure Supplier Policy 2025–2028, and other applicable legislative, regulatory and contractual obligations.

It expands and replaces TPA's previous Privacy Policy to ensure full alignment with current requirements for funded (Career Start / Career Boost) and Fee-for-Service students.

3. Scope

This policy applies to:

- Learners and prospective learners
- Employees, trainers, assessors and contractors
- Third-party providers and partners
- Visitors, stakeholders, employers and clients

It covers all personal and sensitive information collected via enrolment, training delivery, assessment, student support, employment, websites, emails, telephone or any other means.

4. Definitions

- Personal information – Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.
- Sensitive information – Includes health or disability information, racial or ethnic origin, cultural background, support needs, and other categories protected under the Privacy Act.
- USI – Unique Student Identifier issued by the Australian Government.
- NCVER – National Centre for Vocational Education Research Ltd (national VET data custodian).
- DTET – Queensland Department of Trade, Employment and Training.
- ASQA – Australian Skills Quality Authority.

5. Policy Principles

TPA is committed to:

- Collecting only information reasonably necessary to provide training, assessment and support services and to meet legal obligations.
- 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 and providing access and correction rights.
- Maintaining confidentiality wherever reasonably practicable.
- Providing a clear Privacy Notice before or at enrolment and retaining evidence of provision.

Sensitive information is collected only where a permitted general or health situation applies under the Privacy Act, or where required or authorised by law, or with the individual's consent.

6. Collection of Information

TPA collects personal information only where reasonably necessary to:

- Process enquiries and enrolments
- Determine eligibility for Career Start or Career Boost funding and apply correct co-contribution fees
- Deliver training and assessment and provide learner support
- Verify identity and maintain student records
- Issue AQF certification documentation
- Meet legislative, regulatory and contractual reporting obligations (including to NCVER, ASQA and DTET)

- Administer fees, payments and refunds
- Conduct quality assurance and continuous improvement.

Information is collected through enrolment forms, Pre-Enrolment Assessment, Student Agreements, emails, telephone, online systems, assessment activities, training records and direct communication. Background statistical information (prior education, disability, Indigenous status, etc.) is collected as required under the National VET Data Policy.

7. Unique Student Identifier (USI)

All students in nationally recognised training must have a USI and provide it to TPA. TPA may create a USI on behalf of a student who authorises it. In doing so TPA collects and verifies identity information solely for that purpose and securely destroys the identity documents once the USI is validated. USI information is handled strictly in accordance with the Student Identifiers Act 2014 and is not used for unrelated purposes.

8. Storage, Use and Security

TPA takes reasonable steps to protect personal information through secure electronic systems, password protection, controlled access permissions, secure physical storage, staff confidentiality obligations, secure disposal, data backups and cybersecurity controls appropriate to the organisation's size and nature.

Personal information is used only for the purposes for which it was collected (student administration, training delivery, reporting, certification, support, quality improvement and compliance) unless the individual consents or disclosure is required or authorised by law.

TPA may use contact details for internal marketing of its own courses; individuals may opt out at any time. Information is not passed to third-party marketers without prior written consent.

9. Disclosure of Information

TPA will not disclose personal information unless:

- The individual is aware that information of that kind is usually passed to that person or organisation, or has given consent
- Disclosure is required or authorised by law (including the NVETR Act)
- Disclosure is necessary to prevent or lessen a serious threat to life, health or safety
- Disclosure is reasonably necessary for law enforcement or protection of public revenue.

Personal information is disclosed as required to NCVER (National VET Data Collection), ASQA, DTET and other authorised government agencies. It may also be disclosed to employers (where training is employer-sponsored), contractors under confidentiality arrangements, survey organisations and researchers for statistical, regulatory and research purposes consistent with the National VET Data Policy.

TPA does not sell, rent or trade personal information and does not disclose personal information overseas except where required for a legitimate purpose and with appropriate safeguards.

10. Mandatory VET Privacy Notice

In accordance with the National VET Data Policy, the following Privacy Notice is provided to all students (normally as part of the enrolment process) and evidence of provision is retained:

Why we collect your personal information – As a registered training organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us.

How we use your personal information – We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

How we disclose your personal information – We are required by law (under the National Vocational Education and Training Regulator Act 2011 (Cth)) to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). We are also authorised by law to disclose your personal information to the relevant state or territory training authority.

How the NCVER and other bodies handle your personal information – The NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the Privacy Act 1988 and the NVETR Act. Your personal information may be used and disclosed by NCVER for purposes that include populating authenticated VET transcripts, administration of VET, facilitation of statistics and research, and understanding the VET market. Further information is available in NCVER's Privacy Policy and the Department of Employment and Workplace Relations VET Data Privacy Notice.

11. Access and Correction of Records

Individuals have the right to request access to, or correction of, the personal information TPA holds about them. Requests should be made in writing to TPA Administration. Identity will be verified. TPA will respond within a reasonable timeframe (normally within 10 business days). There is no charge for reasonable access requests; a reasonable charge may apply for copies. Reasons will be given if access or correction cannot be granted.

12. Data Breach Management

Any actual or suspected privacy breach, data breach, cybersecurity incident, loss of records, unauthorised access or unauthorised disclosure must be reported immediately to management. TPA will contain the breach, assess the risk of serious harm, investigate, implement corrective actions, and (where required under the Notifiable Data Breaches scheme) notify affected individuals and the Office of the Australian Information Commissioner.

13. Privacy Complaints

Any person who believes their privacy has been breached may lodge a complaint through a Manager, the Director, the Complaints Form, or TPA's Complaints and Appeals Policy and Procedure. Complaints will be

investigated promptly, fairly and confidentially. Individuals may also escalate to the Office of the Australian Information Commissioner (www.oaic.gov.au | 1300 363 992).

14. Roles and Responsibilities

- Director – Overall accountability for privacy compliance, systems, significant incidents and continuous improvement.
- Administration / Student Support – Day-to-day collection, secure handling, provision of Privacy Notices, access and correction requests, and first-line response to privacy matters.
- Trainers, Assessors and all staff – Protect personal information, maintain confidentiality, report breaches, and follow this policy.
- Contractors and third parties – Comply with contractual privacy obligations and report any actual or suspected breaches.

15. Procedures

14.1 Privacy Notices

1. Ensure the mandatory VET Privacy Notice (Section 9) and a reference to this Policy are included on the Enrolment Form / Student Agreement and provided before or at enrolment.
2. Retain evidence that the notice was provided (signed agreement, checklist or system record).
3. Publish this Policy on the TPA website and reference it in the Student Handbook.

14.2 USI Collection and Creation

- Collect the USI on the Enrolment Form. Where a student requests TPA to create a USI, obtain signed authority and required identity documents.
- Do not create a USI without signed authority that includes the privacy notice.
- Once the USI is generated and validated, securely destroy the identity documents used for that purpose.

14.3 Access and Correction Requests

- Receive written requests and verify the identity of the requester.
- Provide access or arrange viewing within a reasonable time (target 10 business days).
- Update records if correction is valid; advise the individual of the outcome.
- Record the request and action taken on the student file.

14.4 Responding to Privacy Complaints and Breaches

- Acknowledge the complaint, investigate fairly, and provide a written outcome.

- For suspected data breaches, contain, assess risk of serious harm, notify if required, and implement improvements.
- Escalate significant matters to the Director.

16. Related Documents and Mapping

- TPA Student Handbook (Privacy, Records & USI section)
- TPA Enrolment Form
- TPA Fees & Refunds Policy and Procedure
- TPA Complaints and Appeals Policy and Procedure
- TPA Records Management practices
- National VET Data Policy and mandatory Privacy Notice
- SAS Policy 2025–2028 – Performance Standard 1 (Privacy Notice)
- 2025 Standards for RTOs – Outcome Standard 2.1 and records-related requirements

17. Review

This Policy and Procedure is reviewed at least annually or earlier if legislation, the SAS Policy, the 2025 Standards or TPA operations change materially. Next scheduled review: August 2027.

Version	Date	Description	Author	Approved By
1.0	08/2026	Full rewrite combining and expanding TPA existing Privacy Policy with current legislative, SAS 2025-28 and 2025 Standards requirements	Brooke Lo Giudice	Jasmine Whittle CEO