



Privacy Policy

Document Control

- Policy Name: Privacy Policy
- Version: 1.0
- Approved By: Jason Hartwell (CEO)
- Approval Date: 1st of January 2026
- Review Date: 1st of January 2027
- Responsible Person: Jason Hartwell (CEO)

1. Purpose

This Privacy Policy outlines how Australian Operator Training collects, uses, stores, and discloses personal information in compliance with:

- ASQA 2025 Standards for RTOs
- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- National VET Data Policy & AVETMISS requirements

This policy supports compliance, student protection, and continuous improvement of data governance practices.

This policy is supported by the RTO's Risk Management Framework, under which privacy and data protection risks are identified, assessed, monitored, and reviewed as part of the organisation's governance system.

2. Scope

This policy applies to all:

- Students and prospective students
- Staff and contractors
- Employers and third parties engaging with the RTO

3. Consent and Notification

At the point of enrolment, individuals provide informed and explicit consent (via signed or electronic declaration) to the following:

- Acknowledge they have read and understood this Privacy Policy
- Consent to the collection, use, and disclosure of their personal information as outlined in this policy
- Consent to the disclosure of their information to relevant government agencies, including NCVET, as required under the National VET Data Policy

This policy is implemented through:

- Enrolment forms (including privacy notices and declarations)
- Student handbooks
- Terms and conditions of enrolment

4. What Information We Collect

We only collect personal information that is reasonably necessary for our training, assessment, and compliance functions in accordance with the Australian Privacy Principles.

4.1 Student Information

- Full name, date of birth, gender
- Contact details (address, phone, email)
- Unique Student Identifier (USI)
- Employment and education history
- Identification documents
- Language, literacy and numeracy (LLN) information
- Training progress, assessment outcomes, and results

4.2 Sensitive Information

- Disability or health information (where relevant to support needs)
- Indigenous status (for reporting purposes)

4.3 Other Information

- Employer details (for workplace-based training)
- Payment and financial information

5. How We Collect Information

We collect personal information through:

- Enrolment processes (online and paper-based)
- Training and assessment activities
- Direct communication (email, phone, face-to-face)
- Third parties (e.g. employers, government agencies)
- AVETMISS-compliant data collection systems

We take reasonable steps to ensure that personal information collected is accurate, complete, and up to date at the time of collection and throughout its use.

6. Why We Collect Information

We collect and use personal information to:

- Deliver, assess, and manage nationally recognised training
- Issue AQF qualifications and statements of attainment
- Report training activity to government agencies (e.g. NCVER)
- Meet compliance obligations under ASQA Standards
- Provide student support services
- Manage enrolments, payments, and administration

7. Disclosure of Information

We may disclose personal information to:

- National Centre for Vocational Education Research (NCVER)
- Commonwealth and State Government Departments
- ASQA and other regulatory bodies
- Employers (where relevant and authorised)
- Third-party service providers (e.g. LMS, SMS, IT providers)

All disclosures are made in accordance with legislative requirements and with appropriate safeguards.

8. AVETMISS & National Reporting

As an RTO, we are required to collect and report student data under the National VET Data Policy.

This includes:

- Submission of AVETMISS data to NCVER
- Use of personal data for statistical, regulatory, and research purposes

Students are informed of these requirements during enrolment and provide consent for this reporting.

9. Data Storage and Security

We take reasonable steps to protect personal information from:

- Misuse, interference, and loss
- Unauthorised access, modification, or disclosure

Security measures include:

- Secure digital systems with password protection
- Role-based access controls
- Secure storage of physical records
- Regular system monitoring and updates
- Use of secure, reputable cloud-based platforms
- Access to personal information is approved by authorised personnel and reviewed periodically to ensure access remains appropriate to role responsibilities

10. Third-Party Data Handling and Offshore Disclosure

We may engage third-party providers to store or process personal information.

Where this occurs:

- Providers are assessed for privacy and security compliance
- Contracts include confidentiality and data protection obligations
- Access is restricted to authorised purposes
- Third-party providers are subject to periodic review to ensure ongoing compliance with privacy and data security obligations

If personal information is disclosed overseas:

- We take reasonable steps to ensure compliance with APP 8
- Individuals are informed where required
- Transfers occur only where appropriate safeguards exist

11. Access and Correction

Individuals have the right to:

- Request access to their personal information
- Request correction of inaccurate or incomplete information

Requests must be submitted in writing to:

CEO - jason.hartwell@aot.net.au

We will respond within 5 days.

12. Data Retention and Records Management

We retain records in accordance with:

- ASQA Standards (2025)
- AQF requirements
- Legislative and regulatory obligations

This includes:

- Retaining student results and AQF certification documentation indefinitely as required
- Retaining assessment evidence in line with regulatory requirements
- Maintaining AVETMISS data in accordance with national standards
- Secure disposal of records when no longer required
- Assessment evidence is retained for the period required under ASQA and regulatory requirements
- Record retention practices are supported by the RTO's Records Management Policy

This policy should be read in conjunction with:

- Records Management Policy
- Information Technology Security Policy
- Complaints and Appeals Policy

13. Data Breach Response Procedure

13.1 Definition

A data breach occurs when personal information is lost, accessed, or disclosed without authorisation.

13.2 Response Process

In the event of a suspected or confirmed breach:

- 1. Contain the breach**
Secure systems and prevent further unauthorised access
- 2. Assess the breach**
Determine the type of information and risk of harm
- 3. Notify where required**
 - Notify affected individuals if serious harm is likely
 - Notify the OAIC under the Notifiable Data Breaches Scheme
- 4. Investigate and remediate**
Identify root cause and implement corrective actions
- 5. Record and review**
Maintain a breach register and review controls

14. Staff Responsibilities and Training

All staff and contractors:

- Receive privacy and confidentiality training at induction
- Participate in ongoing professional development
- Access personal information only as required for their role
- Must report suspected data breaches or privacy concerns

15. Complaints Handling

If you believe your privacy has been breached, you may lodge a complaint.

Internal Process

Contact: Jason Hartwell (CEO)

- Complaints will be acknowledged promptly
- Investigations will be conducted in accordance with the RTO Complaints and Appeals Policy
- A response will be provided within 10 business days

External Process

If not satisfied, complaints may be made to:

Office of the Australian Information Commissioner (OAIC)

www.oaic.gov.au

16. Continuous Improvement

Privacy-related matters, including:

- Complaints
- Data breaches
- Audit findings

are recorded and reviewed as part of the RTO's continuous improvement system.

Improvements are implemented to strengthen data protection and compliance.

17. Updates to this Policy

This policy is reviewed regularly to ensure compliance with:

- Legislative changes
- ASQA Standards updates
- Operational and risk management improvements

18. Contact Details

Australian Operator Training

10 Clermont Street, Emerald. QLD 4720

Phone: 07 49 822 541

Email: reception@aot.net.au

Website: www.aot.net.au