HIGHLAND TRAINING SERVICES

PRIVACY POLICY

COMPLIANCE REQUIREMENTS

PRIVACY POLICY

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PURPOSE

This policy outlines how Highland Training Services Pty Ltd (HTS) collects, uses, stores, and discloses personal information in accordance with the **Privacy Act 1988** (Cth), the **Australian Privacy Principles** (APPs), and other relevant legislation. Personal information is used solely for enrolment, training, support, and reporting purposes. We respect your privacy and are committed to keeping your information secure and confidential.

SCOPE

This policy applies to all employees, students, contractors, and third parties engaged with HTS who may collect, access, or manage personal or sensitive information.

POLICY STATEMENT

HTS is committed to protecting the privacy of individuals by ensuring all personal information is managed in accordance with relevant privacy legislation.

The enrolment form provides participants with the option to consent to the sharing of progress information with their employer. In some cases, we may be legally required or mandated under the National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) (referred to herein as the Outcome Standards) to disclose participant information to government agencies or other authorised entities. In all other situations, participant information will not be disclosed without written consent.

LEGISLATIVE BASIS FOR PRIVACY MANAGEMENT

HTS takes the privacy of its participants very seriously and complies with all legislative requirements, including the **Privacy Act 1988** (Cth) and the **Australian Privacy Principles** (2014).

Information provided during enrolment may be disclosed to employers where consent is granted. However, in some cases, participant data may be disclosed without consent if required by law or under the Outcome Standards for NVR Registered Training Organisations 2025.

Your enrolment form allows participants to give us permission to discuss the Participants progress with their employer. In some cases, we will be required by Law or required by the Outcome Standards for NVR Registered Training Organisations 2025 to make participant information available to others. In all other cases, we ensure that we will seek the written permission of the participant.

The thirteen Privacy Principles are defined below:

- **Principle 1** – Open and transparent management of personal information. The object of this principle is to ensure that HTS's entities manage personal information openly and transparently.
- **Principle 2** – Anonymity and pseudonymity. Individuals may have the option of not identifying themselves or using a pseudonym when dealing with HTS in relation to a matter.
- **Principle 3** – Collection of solicited Personal Information. HTS must not collect personal information (other than sensitive information) unless the information is reasonably necessary for HTS's business purposes.
- **Principle 4** – Dealing with unsolicited personal information. If HTS receives personal information, HTS must, within a reasonable period after receiving this information, determine whether or not we would have collected the information under Australian Privacy Principle 3, and if not, we must, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.
- **Principle 5** – Notification of the collection of personal information. Requires HTS to notify our clients, staff, and participants of any additional information we collect about them and further advise them of how we will deal with and manage this information.
- **Principle 6** – Use or disclosure of personal information. The information that HTS holds on an individual that was collected for a particular purpose HTS must not use or disclose the information for another purpose unless the individual has consented.
- **Principle 7** – Direct marketing. As HTS holds personal information about individuals, we must not use or disclose the information for the purpose of direct marketing.
- **Principle 8** – Cross Border disclosure of personal information. Where HTS discloses personal information about an individual to an overseas recipient, HTS must take all steps to ensure that the overseas recipient does not breach the Australian Privacy Principles.
- **Principle 9** – Adoption, use or disclosure of government related identifiers. HTS must not adopt a Government-related identifier of an individual as its own identifier of the individual, except when using identification codes or numbers issued by either the State based regulators, or the Department of Innovation with regard to the Unique Student Identifier.
- **Principle 10** – Quality of personal information. HTS must take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that HTS collects is accurate, up to date and complete.
- **Principle 11** – Security of personal information. If an APP entity holds personal information, the entity must take such steps as are reasonable in the circumstances to protect the information.

- **Principle 12** – Access to personal information. As HTS holds personal information about an individual, HTS must, on request by the individual, give the individual access to the information.
- **Principle 13** – Correction of personal information. As HTS holds personal information about individuals and should we believe that this information is inaccurate, out of date, incomplete, irrelevant, or misleading; or the individual requests the entity to correct the information; HTS must take such steps as are reasonable in the circumstances to correct that information.

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 (referred to herein as the NVR Act)) 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). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector.

We are also authorised by law (under the NVR Act) to disclose your personal information to the relevant state or territory training authority.

HOW NCVER AND OTHER BODIES HANDLE YOUR PERSONAL INFORMATION

NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the **Privacy Act 1988** (Cth) (Privacy Act) 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 relating to education, including surveys and data linkage; and understanding the VET market.

NCVER is authorised to disclose information to the Australian Government Department of Employment and Workplace Relations (DEWR), Commonwealth authorities, state and territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- administration of VET, including program administration, regulation, monitoring and evaluation
- facilitation of statistics and research relating to education, including surveys and data linkage
- understanding how the VET market operates, for policy, workforce planning and consumer information.

NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf. NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how NCVER will handle your personal information, please refer to NCVER's Privacy Policy at *www.ncver.edu.au/privacy.*

If you would like to seek access to or correct your information, in the first instance, please contact your RTO using the contact details listed below.

DEWR is authorised by law, including the **Privacy Act** and the **NVR Act**, to collect, use and disclose your personal information to fulfil specified functions and activities. For more information about how the DEWR will handle your personal information, please refer to the DEWR VET Privacy Notice at *https://www.dewr.gov.au/national-vet-data/resources/national-vet-data-policy.*

SURVEYS

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted.

CONTACT INFORMATION

At any time, you may contact HTS to:

- request access to your personal information
- correct your personal information
- make a complaint about how your personal information has been handled ask a question about this Privacy Notice

NATIONAL VOCATIONAL EDUCATION AND TRAINING ACTS 2011

These three acts are named in the legislative listing and define the acts of Federal Parliament that empower ASQA to administer the operations and compliance of RTOs in most states of Australia and any RTOs that operate in more than one State in Australia.

This includes the right of ASQA to audit HTS, apply penalties for non-compliance and define the requirements to retain records and other administrative and operational requirements of a functioning RTO.
HTS is answerable to ASQA for their operations.

POLICY IMPLEMENTATION

The implementation of this policy is supported by:

- Staff induction and training on privacy and data protection requirements
- Internal audits and validation activities
- Stakeholder feedback
- Version control and quality assurance mechanisms

Compliance with this policy will be reviewed at least annually, as part of HTS's quality assurance cycle, in alignment with our Self-Assurance Schedule.

ACCOUNTABILITY

The following table outlines the key roles within the organisation and their specific responsibilities in relation to the implementation, monitoring, and continuous improvement of this policy. Each role is accountable for ensuring the policy is upheld in practice and integrated effectively into relevant operational and compliance processes.

ROLES	RESPONSIBILITIES
Quality Management Team	• Oversee the implementation and resourcing of privacy compliance initiatives • Approve significant changes related to data protection • Ensure strategic alignment with regulatory obligations
Quality Management Team	• Monitor compliance with privacy legislation and the Outcome Standards for NVR RTOs 2025 • Maintain the Continuous Improvement Register • Analyse and act on audit findings and privacy complaints
Trainers and Assessors	• Promote privacy awareness among learners • Ensure personal data in assessments is appropriately managed • Report breaches or risks to compliance staff • Handle student information in line with privacy protocols • Report any data handling concerns • Support privacy assurance in assessment and feedback activities
Administration	• Maintain secure student records • Support accurate and confidential data collection processes • Escalate privacy risks or breaches to management
Third Party Providers	• Adhere to HTS's privacy policy and contractual obligations • Report issues or risks promptly • Implement improvement actions where relevant

MONITORING

The Accountable Officer is responsible for ensuring Policy Instruments are reviewed, normally on a five-year cycle from the date they came into effect or the date of the last review. An earlier review of the Policy Instrument may be initiated if significant regulatory changes occur or a need is identified. A Policy Instrument under review remains in force until the revised Policy Instrument is approved.

POLICY INFORMATION	
Accountable Officer	Director
Date Effective	11th Sept 2025
Review Date	1st April 2027
Version Number	1.0

REGULATORY FRAMEWORK

This policy has been developed with reference to a range of legislative instruments, standards, guidelines, and regulatory principles that govern our operations as an RTO. These frameworks ensure that we operate with integrity, uphold quality training and assessment practices, and meet our legal obligations to students, regulators, and the broader community.

The following documents underpin the principles and practices outlined in this policy and should be considered in its application:

- AQF Qualifications Issuance Policy
- *Competition and Consumer Act 2010*
- *Copyright Act 1968*
- *Corporations Act 2001*
- *National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025*
- *National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020*
- *National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025*
- *National Vocational Education and Training Regulator Act 2011*
- *National Vocational Education and Training Regulator Regulations 2011*
- National VET Data Policy
- *Privacy Act 1988*
- AVETMISS data element definitions: edition 2.3
- AVETMISS VET Provider Collection specifications: release 8.0

RELATED DOCUMENTS

For a complete and centralised list of interconnected documents - including associated policies, procedures, forms, and checklist - please refer to the Dependency Matrix located within the Quality Manual. This matrix has been designed to support consistency, version control, and alignment across the broader compliance framework.

DEFINITIONS

To ensure consistency and clarity across all policies, procedures, and supporting documents, HTS maintains a centralised Definitions Library, located within the Quality Manual. This resource contains standardised definitions of key terms and acronyms commonly used throughout our quality management system and compliance framework. All documents should be read in conjunction with the Definitions Library to support accurate interpretation and application of terminology. Where a term is used within this policy and is not explicitly defined herein, it should be understood according to its definition in the Definitions Library. The Definitions Library is reviewed and maintained regularly to reflect changes to legislation, regulatory standards, and sector-specific terminology. Any suggestions for additions or amendments to the Definitions Library should be directed to the Compliance Team for consideration as part of our continuous improvement practices.