

Privacy Policy

PURPOSE

This policy outlines how Trainwest collects, uses, discloses, and manages personal information to ensure compliance with relevant legislation and standards.

Trainwest is committed to protecting the privacy and confidentiality of personal information in compliance with the Standards for Registered Training Organisations (RTOs) 2015, National Vocational Education and Training Regulator Act 2011, Privacy Act 1988, Australian Privacy Principles, Data Provision Requirements 2020 and the National VET Data Policy.

SCOPE

This policy applies to all Trainwest employees and third-party partners operating under a third-party arrangement.

RESPONSIBILITIES

Chief Executive Officer (CEO)	Oversee the development, implementation and maintenance of privacy practices. Ensure compliance with privacy legislation and regulations.
General Managers	Ensure all students are informed of the National VET Data Policy at prior to enrolment.
Employees	Comply with privacy laws, policies, and procedures. Safeguard the privacy and confidentiality of personal information. Report any privacy breaches or concerns to the General Managers.
Third-Party Partners	Ensure compliance with privacy legislation and regulations. Ensure all students are informed of this policy and National VET Data Policy prior to enrolment.

Policy Statement

Trainwest takes the privacy of our students and employees seriously and comply with all legislative requirements, ensuring that collection of information is fair, lawful, unobtrusive and necessary for the organisational functions.

We will ensure all students and employees are informed of the purpose for collecting information, how it is used, and how they can gain access to their personal information held by Trainwest.

Student Information

Information is collected from students for enrolment purposes. Assessment records are kept in line with the *Standards for Registered Training Organisations (RTOs) 2015 (the Standards)*. Personal and professional information is collected from employees to enable Trainwest to employ suitably qualified trainers, assessors and team members. It is also a requirement for issuance of nationally accredited qualifications.

Use of student information

- Trainwest is required to collect personal information that is necessary for enrolment into nationally accredited and non-accredited training courses
- This information is required by law to collect, hold, use and supply personal information, in accordance with the National VET Provider Collection Data Provision Requirements
- Trainwest provides student information to training team members on a need to know basis
- Trainwest uses information collected for the express purpose for which it is collected unless prior consent is obtained from the student
- Trainwest ensure the accuracy of information provided, confirmed through the Student Agreement on the first day of attendance to the course
- Trainwest does not use personal details in direct marketing without obtaining prior written permission from the person concerned
- Students are asked to provide consent prior to any photographs or video evidence being captured for marketing purposes
- Students are asked to provide consent for Trainwest to release or discuss course progress with their employer
- Trainwest will not release any personal information to a third party without the written consent of the student, unless we are required to do so by law.

Storage and security of information

Trainwest takes all reasonable steps to protect personal information against misuse and loss by:

- Securing all files in secure locations, both physical and electronic
- Restricting access to information to relevant team employees
- Destroying information securely after the required retention period
- Ensuring computer security at all times, through the use of firewalls, up-to-date antivirus software, password security for computer systems and file permissions
- Not releasing information to third parties without prior written permission
- Notifying relevant government bodies as per the [Notifiable Data Breach Scheme](#).

Refer to our Records Keeping Policy for more information.

Access to your performance information

Trainwest provides access to student personal information on request for the purpose of changing and updating information.

If you wish to access your student information file, please direct your enquiry to admin@trainwest.com.au.

Disclosure of your information

Trainwest is required by law under the *National Vocational Education and Training Regulator Act 2011 (Cth) (NVETR Act)* to disclose the personal information we collect 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 NVETR Act) to disclose personal information to the relevant state or territory training authority. From time to time, we may also have to disclose your information as a result of a court order, subpoena, warrant or in the course of a legal proceeding or in response to a law enforcement agency request.

We may supply attendance, progress and participation information as well as a copy of outcome of results from training to the following parties:

- Schools – if you are a secondary student undertaking VET training as part of a school program
- Employers – if you are enrolled in training paid for by your employer
- Regulatory Bodies – if you are enrolled in a course regulated by another organisation
- Commonwealth and State or Territory government departments and authorised agencies
- National Centre for Vocational Education Research Ltd (NCVER).

You must complete a Disclosure of Details Consent Form for results or other information to be released to any other third party not listed above.

Trainwest will not supply personal information to any other party without authorisation. Students can complete the consent form if they require information about their training to be released to a third party.

Trainwest may use your personal information to provide direct marketing materials, updates or newsletters pertaining to current and past course enrolments or enquiries. Students are requested media consent and subscribing to marketing emails in the Student Agreement.

All other media consent is requested through our Media Consent Form.

You may unsubscribe from marketing emails at any time by clicking the unsubscribe link on the email or sending an email to admin@trainwest.com.au with the subject 'unsubscribe'. From time to time, you may be emailed or receive an SMS from us to confirm or change course bookings.

We do not, and will not, sell your personal information to any other party.

Privacy Notice

Under the NVETR legislation, we must include the below Privacy Notice on our enrolment documents:

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) (NVETR 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 *NVETR Act*) 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 (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.

The 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.

The NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf.

The NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how the NCVER will handle your personal information please refer to the 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 *NVETR 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/vet-privacy-notice>.

Surveys

You may receive a student survey which may be run by a government department or an NCVET 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 Trainwest 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.

Telephone: 1300 938 411

Email: admin@trainest.com.au

Quality Management

In our commitment to uphold the highest standards of quality across all our operations, our Quality Management System (QMS) integrates measures for quality control, quality assurance and continuous improvement.

This policy undergoes a systematic review during our annual internal audit, as per our Internal Audit Procedure, reinforcing its role in achieving quality objectives and compliance standards. Ongoing review activities are documented as per our Quality Assurance Procedure.

Identified issues and improvements in this process, along with related practices and systems, are recorded in the CI Register, as per our Continuous Improvement Procedure. Employees are encouraged to contribute to continual improvement by submitting a CI Request if they identify any issues or improvement opportunities.

DEFINITIONS

Access and Equity	Policies and approaches responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level, unemployment, imprisonment or remote location may present a barrier to access, participation and the achievement of suitable outcomes.
Australian Skills Quality Authority (ASQA)	The national regulator for Australia's vocational education and training sector.
Compliance	The state of being in accordance with established guidelines or specifications, or the process of becoming so.
Learner	A person being trained and/or assessed by the RTO for the purpose of issuing AQF certification documentation. Refer to Student.
National Centre for Vocational Education Research (NCVER)	The national professional body responsible for collecting, managing, analysing and communicating research and statistics on the Australian Vocational Education and Training (VET) sector.
Quality Management System (QMS)	A collection of business processes and procedures which aims to ensure that the quality of products or services meets – or exceeds – customer expectations. Such systems are typically repeatable and measurable and rely on continuous improvement.
Registered Training Organisation (RTO)	An organisation, registered with ASQA in accordance with the requirements of the VET Quality Framework, to provide specific vocational education and training and/or assessment services.
Standards for Registered Training Organisations (RTOs) 2015	Also referred to as the Standards, they form part of the VET Quality Framework, a system which ensures the integrity of nationally recognised qualifications. The Standards are enabled by the National Vocational Education and Training Regulator Act 2011 (NVR Act). RTOs are required to comply with these Standards in order to be an RTO in Australia.
Student	Person receiving training and/or assessment services provided by Trainwest, or by a third party on our behalf. This includes learners, participants, candidates and trainees.
Third-Party	Any party that provides services on behalf of the RTO but does not include a contract of employment between an RTO and its employee.
VET Quality Framework	The VET Quality Framework comprises of the: <ul style="list-style-type: none"> Standards for Registered Training Organisations (RTOs) 2015 Financial Viability Risk Assessment Requirements 2021 Data Provision Requirements 2020 Australian Qualifications Framework
Vocational Education and Training (VET)	Learning that directly relates to getting a job. The VET system delivers education and training services for individuals at every stage of their work life, whether you're a student, a job seeker or already employed.

Refer to our Glossary for a list of all Trainwest terms and definitions.

RELATED DOCUMENTS

Internal

Policies	<ul style="list-style-type: none"> Access and Equity Policy Enrolment Policy Governance Policy Records Keeping Policy
Procedures	<ul style="list-style-type: none"> Continuous Improvement Procedure Enrolment Procedure
Guides	<ul style="list-style-type: none"> Code of Conduct Employee Handbook Trainwest Student Handbook Trainwest Student Handbook – Third Party
Forms	<ul style="list-style-type: none"> Disclosure of Details Consent Form Media Consent Form Student Agreement
Systems	<ul style="list-style-type: none"> Canvas PowerPro Trainwest Intranet Trainwest Website

External

Legislation	<ul style="list-style-type: none"> Standards for Registered Training Organisations (RTOS) 2015 National Vocational Education and Training Regulator Act 2011 Privacy Act 1988 Australian Privacy Principles Data Provision Requirements 2020 National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020 National VET Data Policy Student Identifiers Act 2014 Student Identifiers Regulation 2014 Student Identifiers (Exemptions) Instrument 2021
Compliance	<ul style="list-style-type: none"> Commerce WA – Privacy and confidentiality of records OAIC – Notifiable Data Breaches scheme OAIC – Privacy