

Privacy and Information Management Policy

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Document Owner: LSCC Manager	Jurisdictions: ACT, NSW, QLD, TAS and WA

1. Purpose

This policy aims to ensure NECA Training:

- protects the privacy and confidentiality of personal information held in connection with its operations as a Registered Training Organisation;
- complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles, both as a matter of best practice and, where NECA Training is legally an APP entity, as a legal obligation;
- meets its obligations under the Student Identifiers Act 2014 (Cth) and the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020;
- satisfies state and territory funding contract privacy requirements in the ACT, NSW, and QLD, and applicable Commonwealth privacy obligations for fee-for-service delivery in TAS and WA;
- maintains a clearly expressed and up-to-date Privacy Policy that is openly available, in accordance with APP 1.

2. Scope

This policy applies to all NECA Training staff (including permanent and casual employees, contractors, and volunteers), all students and prospective students, and all third parties who handle personal information on NECA Training's behalf, across all jurisdictions in which NECA Training operates (ACT, NSW, QLD, TAS, and WA).

3. Responsibilities

3.1 LSCC Manager

The LSCC Manager is the document owner for PIM-001-POL and the designated privacy coordination contact for NECA Training. The LSCC Manager is responsible for maintaining this policy, coordinating data breach assessment and response, overseeing privacy complaint handling, managing access and correction requests, and ensuring staff privacy training is delivered.

3.2 Chief Executive Officer

The Chief Executive Officer, as Principal Executive Officer, jointly assesses data breach severity with the LSCC Manager, authorises notifications to the Office of the Australian Information Commissioner and affected individuals, and provides governance oversight of privacy and information management.

3.3 Operations Manager

The Operations Manager is responsible for the accuracy and completeness of student enrolment, training, and assessment records held across NECA Training's training delivery systems (VETtrak, LMS, and DMS), and is consulted on access and correction requests relating to student training records.

3.4 HR Manager

The HR Manager is responsible for the privacy of staff personnel records and coordinates with the LSCC Manager and the Operations Managers on the scheduling and delivery of staff privacy awareness training.

3.5 Administrative Support

Administrative Support staff are responsible for collecting personal information at enrolment, verifying USIs, and maintaining data accuracy in VETtrak.

3.6 Finance Manager

The Finance Manager is responsible for the accuracy and integrity of financial records held in Navision 17, including general business expenditure, the corporate general ledger, and refund payment transactions.

3.7 Senior Technical Trainers and Technical Trainers

Senior Technical Trainers and Technical Trainers are responsible for ensuring that any changes to student personal details identified during training delivery are communicated promptly to the Operations Manager for update in VETtrak.

4. Policy

NECA Training will act in accordance with the Australian Privacy Principles in all aspects of its collection, use, storage, and disclosure of personal information. NECA Training will:

- maintain and make publicly available a current Privacy Policy that is openly expressed and up to date;
- collect personal information only by lawful and fair means, and only where it is reasonably necessary for NECA Training's functions and activities as an RTO;
- at or before the time of collection, take reasonable steps to notify individuals of the matters required under APP 5, including the identity of NECA Training, the purposes for which information is collected, and the third parties to whom it may be disclosed;
- use and disclose personal information only for the purpose for which it was collected, or for a directly related secondary purpose, except as permitted by law;
- take reasonable steps to ensure that personal information is accurate, up to date, and complete;
- protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure;
- maintain a documented data breach response plan and notify relevant Commonwealth and state authorities of data breaches in accordance with applicable legislation and funding contract obligations, including the NSW Smart and Skilled Contract and the QLD SAS Agreement;
- provide individuals with access to their personal information on request, and allow correction of information that is inaccurate, out of date, incomplete, irrelevant, or misleading;
- handle complaints about privacy in a timely, fair, and confidential manner;
- ensure that all staff who handle personal information understand their obligations under this policy and receive appropriate training;
- comply with all applicable Commonwealth privacy and information legislation, including the Privacy Act 1988 (Cth), the Student Identifiers Act 2014 (Cth), and state and territory funding contract obligations relating to the collection and disclosure of student data.

4.1 Information NECA Training Collects

NECA Training collects personal information in the following categories, depending on the individual's relationship with NECA Training.

Category	Information Collected
Student and Prospective Student Information	Full name, date of birth, contact details (address, phone, email), gender, Unique Student Identifier (USI), citizenship and residency status, school level completed, prior education and qualifications, employment and labour force status, Indigenous status, disability or medical conditions affecting learning, language background, enrolment and training records, assessment results, and attendance records.
Staff and Contractor Information	Full name, contact details, qualifications and credentials, employment history relevant to training and assessment roles, Working with Children Check clearance details, tax file number (for payroll), bank account details (for payroll), emergency contact details, and performance and professional development records.
Sensitive Information	Where relevant to the provision of training support or funding eligibility, NECA Training may collect sensitive information such as Indigenous status, disability status, and health information. NECA Training will only collect sensitive information with the individual's consent, unless otherwise required by law.

4.2 Permitted Uses and Disclosures

NECA Training will use personal information only for the purposes for which it was collected, or for a directly related secondary purpose that the individual would reasonably expect. NECA Training will not disclose personal information to third parties except where permitted below. Permitted uses and disclosures include:

- establishing and administering the student's enrolment, training plan, and assessment activities;
- providing student support, including learning support and wellbeing services;
- issuing AQF certification documentation upon successful completion;
- reporting student activity data to the National Centre for Vocational Education Research (NCVER) in accordance with the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020 and AVETMISS data standards, including for the purpose of issuing VET Statements of Attainment or Qualifications, populating Authenticated VET Transcripts, facilitating VET statistics and research, understanding VET market operations for policy and workforce planning, and administering VET programs;
- reporting to Commonwealth, State, and Territory government agencies as required under applicable legislation and funding contracts, including to state funding bodies and relevant apprenticeship and traineeship administrative bodies;
- administering staff employment, payroll, and professional development;
- managing complaints and grievances;
- continuous improvement activities, audits, and regulatory compliance;
- where the individual has provided written consent for a specific disclosure;
- where disclosure is required by Australian law or a court or tribunal order;

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- where disclosure is necessary for a health or safety emergency and the individual would reasonably expect the disclosure;
- where NECA Training reasonably believes disclosure is necessary for enforcement-related activities conducted by or on behalf of an enforcement body;
- to third party service providers engaged by NECA Training to deliver support services, or to deliver training where third party training arrangements are permitted under applicable funding contract conditions and NECA Training has obtained any required regulatory or departmental approvals, where those parties are bound by equivalent privacy obligations. Third party disclosures are subject to the restrictions set out in PIM-001-PRO and applicable funding contract conditions.

Students will be notified of NCVET and state government data reporting obligations at or before the time of enrolment via the Privacy Collection Notice (PIM-001-FRM-001) or the VETtrak online enrolment form.

Where a student is enrolled in training that is funded, arranged, or facilitated by their employer (including apprenticeships and traineeships), NECA Training will obtain the student's written consent before disclosing their training progress, assessment outcomes, or attendance to the employer. Employer disclosure consent is collected at enrolment via the Privacy Collection Notice Part H (PIM-001-FRM-001) or the VETtrak online enrolment form.

Students must be informed that they may decline employer disclosure consent without affecting their enrolment, except where disclosure is required by law or under the terms of a government funding contract or registered training contract. The procedures for collecting and recording employer disclosure consent are set out in PIM-001-PRO.

4.3 Unique Student Identifiers

In relation to each student's USI, NECA Training will:

- request the Student Identifiers Registrar to verify each USI before using it for any purpose, as required by Compliance Standards s.12;
- not include the USI on any AQF qualification or statement of attainment issued to the student;
- not adopt the USI as NECA Training's own identifier of the individual;
- not disclose the USI for any purpose other than those permitted under the Student Identifiers Act 2014;
- where a student is exempt from the USI requirement, notify the student, before enrolment is completed, that their results will not be accessible through the Commonwealth and will not appear on an authenticated VET transcript.

4.4 Data Security and Integrity

NECA Training will take reasonable steps to protect personal information from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. Security measures include:

- storage of student enrolment records, training plans, and results in VETtrak, which provides role-based access controls, audit trails, and secure cloud hosting;
- storage of staff compliance records, incident records, and governance documents in Octosure, which provides encrypted, role-based access with full audit history;
- storage of completed digital assessment tools in the LMS (Moodle), with access restricted to enrolled students and authorised trainers and assessors;
- storage of scanned paper-based assessment tools in the DMS (SharePoint), with access controls aligned to staff roles;
- password protection, two-factor authentication (where available), and regular access reviews for all operational systems;

- physical security measures for paper-based records, including locked filing and restricted access areas;
- staff training and awareness to ensure all staff understand their data handling obligations.

Note - QLD Skills Assure Supplier data storage requirements: For personal information relating to QLD Skills Assure Supplier funded students, the QLD SAS Agreement requires that physical records are stored in Queensland and accessible at all times, and that electronic records are stored in Australia (not offshore) and accessible at all times. NECA Training's electronic systems (Octosure and VETtrak) use Australian-hosted cloud infrastructure that satisfies this requirement. Physical records relating to QLD SAS funded students are retained at NECA Training's Queensland delivery site(s).

NECA Training will take reasonable steps to ensure that personal information held is accurate, up to date, and complete. Students and staff are encouraged to notify NECA Training promptly when their personal details change. NECA Training will update records in VETtrak or relevant systems as soon as practicable after being notified of a change.

4.5 Access to and Correction of Personal Information

Individuals have the right to access and seek correction of personal information held about them by NECA Training. NECA Training will:

- respond to requests for access within a reasonable period;
- provide access to the information in the manner requested, where it is reasonable and practicable to do so;
- not charge a fee for access to personal information, except that a fee may be charged for the reproduction of previously issued AQF certification documentation;
- where access is refused, provide the individual with a written explanation of the legal grounds for that decision and information about how to seek a review;
- upon receipt of a correction request, take reasonable steps to correct the information if it is inaccurate, out of date, incomplete, irrelevant, or misleading;
- where a correction request is refused, notify the individual of the refusal, the reasons, and the mechanisms available to make a complaint.

Access and correction requests must be directed to the LSCC Manager. Where the information relates to a student's training or assessment records held in VETtrak, the Operations Manager will be consulted. Operational timeframes and handling steps are set out in PIM-001-PRO.

4.6 Privacy Complaints

NECA Training will manage privacy complaints in accordance with PIM-001-PRO and the NECA Training Complaints and Appeals Policy (GCA-001-POL). Any person who believes their privacy has been mishandled by NECA Training may lodge a complaint in writing with the LSCC Manager.

If a complainant is not satisfied with NECA Training's response, they may refer the matter to the Office of the Australian Information Commissioner (OAIC). Where applicable, complaints about the handling of funded training data may also be referred to the relevant state funding body. For complaints relating to QLD Skills Assure Supplier funded training, the complainant may refer the matter to the Department of Trade, Employment and Training (DTET) or the Queensland Training Ombudsman, as required under the QLD SAS Agreement.

4.7 Records Management

4.7.1 Records and Storage

NECA Training will maintain the following records in relation to privacy and information management activities:

- student enrolment records and signed Privacy Collection Notices - stored in VETtrak (student file);
- NSW Student Consent to Use and Disclosure of Personal Information forms (SFT-001-FRM-002) - stored in VETtrak (student file) and cross-referenced in Octossure under the NSW Smart and Skilled compliance module;
- privacy complaint records, investigation notes, and outcomes - stored in Octossure under Complaints Management;
- data breach records and notifications - stored in Octossure under Document Control;
- staff privacy training completion records and acknowledgements - stored in Octossure under Trainer Profiles / Document Control;
- this policy and all previous versions - controlled under Octossure Document Control with full version history.

All records will be stored securely and accessible only to authorised personnel. Student-specific records, including enrolment forms and signed Privacy Collection Notices, are stored in the student's VETtrak file. Governance and staff records are stored in Octossure.

4.7.2 Retention Periods

NECA Training will retain personal information for the periods required by applicable legislation and funding contracts. Key retention periods include:

- AQF certification documentation: 30 years from the date the student completes the training product - Compliance Standards s.10;
- Assessment records submitted by students: 2 years after the student completes the training product - Compliance Standards s.10;
- NSW Smart and Skilled training activity records: minimum 3 years after the later of qualification completion, qualification issuance, student exit from subsidised training, or CID finalisation - NSW Smart and Skilled Operating Guidelines;
- QLD Skills Assure Supplier Agreement records (all categories): minimum 7 years from termination of the SAS Agreement - QLD SAS Agreement. Where this period exceeds the ASQA retention requirement for the same record type, the longer period applies;
- Privacy complaint records: minimum 7 years from resolution of the complaint;
- Data breach notifications: minimum 5 years from notification;
- Other student and enrolment records: as specified in the NECA Training Retention Schedule (RMS-001-REG-001).

4.7.3 Destruction and De-identification

NECA Training will destroy or de-identify personal information at the end of its required retention period. Paper-based records are disposed of by cross-cut shredding. Electronic records are securely deleted from operational systems in accordance with the Retention Schedule (RMS-001-REG-001) and the Records Management Policy (RMS-001-POL).

4.8 Continuous Improvement

This policy is reviewed annually, or earlier in case of legislative, regulatory, or significant operational change. For QLD government-subsidised training products, the review cycle is aligned to the QLD Skills Assure Supplier framework period.

NECA Training will continuously monitor and improve its privacy and information management practices in accordance with the Continuous Improvement Policy (CIP-001-POL). Improvement actions are captured in the Octossure Continuous Improvement module.

4.9 Access and Equity

NECA Training is committed to ensuring that its privacy practices are accessible and equitable for all students and stakeholders, regardless of background, ability, or circumstance. Privacy Collection Notices and key information about data handling will be provided in plain English, with interpretation, translation, or accessible format assistance arranged on request where practicable.

Detailed access, equity, and anti-discrimination commitments and obligations are set out in NECA Training's Access, Equity and Anti-Discrimination Policy (AEA-001-POL).

5. Legislative Framework

NECA Training operates across five jurisdictions and manages personal information in compliance with the following legislative and regulatory framework.

Jurisdiction	Key Legislation	Relevance to NECA Training
Commonwealth	Privacy Act 1988 (Cth), C103 (10 Jun 2025) Australian Privacy Principles (Schedule 1)	Governs the collection, use, disclosure, security, and access to personal information. NECA Training has adopted the APPs as its operational standard as a matter of best practice.
Commonwealth	Student Identifiers Act 2014 (Cth), C09 (10 Jun 2025)	Requires collection, maintenance, and reporting of Unique Student Identifiers (USIs) for all VET students. Prohibits inclusion of USI on qualification documents.
Commonwealth	National Vocational Education and Training Regulator Act 2011, C25 (14 Oct 2024)	Establishes ASQA's regulatory framework and registration functions. Provides the overarching legislative basis for ASQA's regulatory role.
Commonwealth (Instrument)	National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025 (F2025L00355)	s.10 - Record retention obligations (AQF certification documentation: 30 years; assessment records: 2 years post-completion). s.12 - USI verification and confidentiality requirements.
Commonwealth (Instrument)	National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025 (F2025L00354)	Outcome Standard 2.1 - Requires that VET students have access to clear and accurate information concerning the organisation and the training product. Outcome Standard 4.4 - Continuous improvement requirements.
ACT	Training and Tertiary Education Act 2003	Establishes obligations for training providers in the ACT, including student record-keeping and

	(ACT), R17 (5 Jan 2026)	reporting to the ACT Government Education Directorate.
NSW	Vocational Education and Training (Commonwealth Powers) Act 2010 No 131	Extends Commonwealth VET powers to NSW; underpins NSW Smart and Skilled contract requirements for consent and disclosure of student personal information to the NSW Department of Education.
QLD	Vocational Education and Training (Commonwealth Powers) Act 2012 (QLD)	Extends Commonwealth VET powers to QLD; underpins QLD Skills Assure Supplier obligations for AVETMISS data reporting and student information management.
QLD	Information Privacy Act 2009 (QLD), current as at 1 July 2025	Defines Eligible Data Breach (s 47) and Queensland Privacy Principles (QPPs, Schedule 3). Under the QLD SAS Agreement, NECA Training must comply with Chapter 2, Parts 1 and 2 and s 41 of this Act as if it were the Department, must comply specifically with QPP 3 and QPP 6, must provide a Privacy Notice to every student meeting QPP 5 requirements, must not transfer personal information outside Australia without Departmental consent, and must notify DTET within 1 Business Day of any actual or suspected eligible data breach.
TAS	Vocational Education and Training (Commonwealth Powers) Act 2011 (Tas)	Basis for ASQA jurisdiction over NECA Training in Tasmania. NECA Training delivers training in TAS on a fee-for-service basis; no state government funding contracts apply. Privacy obligations in TAS arise from Commonwealth legislation and the national RTO standards. The Personal Information Protection Act 2004 (Tas) does not apply to NECA Training.
WA	Vocational Education and Training Act 1996 (WA)	Primary VET legislation in Western Australia. NECA Training delivers training in WA on a fee-for-service basis; no state government funding contracts apply. Privacy obligations in WA arise from Commonwealth legislation and the national RTO standards. The Privacy and Responsible Information Sharing Act 2024 (WA) does not apply to NECA Training.

The currency of legislative references in this document is confirmed as at the version date recorded in the footer. Amendments to legislation are monitored through the Legislative Reference Register. For questions about this policy or legislative requirements, contact the LSCC Manager.

Note on State and Territory Privacy Legislation: The Privacy Acts of the ACT (Information Privacy Act 2014), NSW (Privacy and Personal Information Protection Act 1998), QLD (Information Privacy Act 2009), TAS (Personal Information Protection Act 2004), and WA (Privacy and Responsible Information Sharing Act 2024) are primarily

public sector regimes that govern government agencies and, in some cases, contracted service providers to government.

As a private company, NECA Training is not generally subject to these Acts in the way a public sector agency is. Privacy obligations relevant to NECA Training's operations in the ACT and NSW arise from Commonwealth privacy legislation, the Student Identifiers Act 2014 (Cth), and state funding contract clauses requiring privacy-compliant handling of student data. In Tasmania, the Personal Information Protection Act 2004 (Tas) does not apply to NECA Training. In Western Australia, the Privacy and Responsible Information Sharing Act 2024 (WA) does not apply to NECA Training. Privacy obligations for NECA Training's TAS and WA operations arise from Commonwealth legislation only.

In QLD, NECA Training's obligations under the Information Privacy Act 2009 (QLD) arise directly from the QLD Skills Assure Supplier Agreement, which requires NECA Training to comply with Chapter 2, Parts 1 and 2 and s 41 of that Act as if it were the Department, and to observe the Queensland Privacy Principles in handling student personal information. This contractual obligation applies independently of any Commonwealth Privacy Act small business exemption.

6. Definitions

Term	Definition
Australian Privacy Principles (APPs)	The 13 principles set out in Schedule 1 of the Privacy Act 1988 (Cth) governing the handling of personal information by APP entities.
Data Breach	An event in which personal information held by NECA Training is accessed, disclosed, or lost without authorisation, or where personal information is accessed, modified, or disclosed in circumstances that constitute a breach of the APPs.
De-identification	The process by which personal information is altered so that it can no longer be used to identify an individual, whether directly or indirectly.
Notifiable Data Breach (NDB)	A data breach that is likely to result in serious harm to one or more individuals, triggering notification obligations under the Privacy Act 1988 (Cth) (where applicable).
Personal Information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether recorded in material form or not (s.6 of the Privacy Act 1988 (Cth)).
Privacy Collection Notice	A notice provided to an individual at or before the time of collecting their personal information, as required by APP 5. Issued by NECA Training primarily via the VETtrak online enrolment form, with PIM-001-FRM-001 used as a paper backup.
Queensland Privacy Principles (QPPs)	The 11 privacy principles set out in Schedule 3 of the Information Privacy Act 2009 (QLD) governing the handling of personal information by Queensland public sector agencies and, by contractual obligation under the QLD SAS Agreement, by NECA Training as a supplier of government-subsidised training.
Sensitive Information	A subset of personal information as defined in s.6 of the Privacy Act 1988 (Cth), including information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership,

	sexual orientation, criminal record, health information, and genetic or biometric data. Higher standards apply to the collection and use of sensitive information.
Unique Student Identifier (USI)	A government-issued reference number, allocated by the Student Identifiers Registrar, that creates a permanent online record of an individual's nationally recognised VET qualifications and completions (Student Identifiers Act 2014 (Cth)).
VET Data Policy	The National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020, which prescribes the data that RTOs must collect and report to NCVET and relevant government agencies.

7. Associated Documents and Forms

Document	Reference
Privacy and Information Management Policy & Procedures	PIM-001-POL & PIM-001-PRO
Privacy Collection Notice (paper backup)	PIM-001-FRM-001
NSW Student Consent to Use and Disclosure of Personal Information	SFT-001-FRM-002
Records Management Policy & Procedures	RMS-001-POL & RMS-001-PRO
Retention Schedule	RMS-001-REG-001
Complaints and Appeals Policy	GCA-001-POL
Marketing Policy	MKT-001-POL
State Funded Training Policy	SFT-001-POL
Continuous Improvement Policy & Procedures	CIP-001-POL & CIP-001-PRO
Access, Equity and Anti-Discrimination Policy	AEA-001-POL