



POLICY NAME	Privacy Policy			POLICY NO.	2024.1
EFFECTIVE DATE	24/01/2024	DATE OF LAST REVISION	29/01/2025	VERSION NO.	2
ADMINISTRATOR RESPONSIBLE	Sarah Burnett		CONTACT INFORMATION	admin@aota.com.au	
APPLIES TO Apply group names to define applicable areas of staff.					
GROUP 1	Trainers and Assessors	GROUP 2	Administration Staff	GROUP 3	Directors and Managers
GROUP 4	Students	GROUP 5		GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1	Sarah Burnett		Initial publication	Sarah Burnett
1.1	Sarah Burnett	29/1/2025	Include link to new revised standards	
2.0	Sarah Burnett	12/5/25	Updated to new standards and included further sections that relate to legislation	

APPROVAL AND REVIEW

ADDITIONAL NOTES

PURPOSE

This Privacy Policy outlines how All high Risk Training Pty Ltd (AHRT) collects, uses, stores, and discloses personal information in accordance with the **Privacy Act 1988 (Cth)**, including the **Australian Privacy Principles (APPs)**, and other applicable legislation such as the **Student Identifiers Act 2014**. It also ensures AHRT's compliance with the **Standards for RTOs 2025**, particularly in relation to **learner data privacy, record security, and consent**.

SCOPE

This policy applies to:

- All learners, prospective students, and clients of AHRT,
- AHRT staff, contractors, and third parties involved in handling personal information,
- Any person or organisation providing information to AHRT.

AHRT is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

POLICY STATEMENT

AHRT is committed to protecting the privacy of individuals in accordance with the **Privacy Act 1988**, the **Student Identifiers Act 2014**, and the **Standards for RTOs 2025**. AHRT collects only the information required to:

- Deliver and report on vocational education and training,
- Issue nationally recognised qualifications,
- Meet its legal and regulatory obligations,
- Support students with relevant services.

Personal information will be collected fairly, stored securely, used only for its intended purpose, and disclosed only as legally required or with the individual's consent.

TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION
NCVER	The National Centre for Vocational Education Research (NCVER) is the national professional body responsible for collecting, managing, analysing and communicating research and statistics on the Australian vocational education and training (VET) sector.

APP's	The Australian Privacy Principles (or APPs) are the cornerstone of the privacy protection framework in the Privacy Act 1988. They apply to any organisation or agency the Privacy Act covers.
Personal Information	Information that identifies an individual or allows their identity to be reasonably ascertained (e.g., name, contact details, date of birth).
Sensitive Information	Information such as health records, racial or ethnic origin, religious beliefs, or criminal record. Requires stricter handling under the Privacy Act.
Unique Student Identifier (USI)	A unique reference number issued to individuals undertaking nationally recognised training in Australia.
Australian Privacy Principles (APPs)	13 principles under the Privacy Act 1988 that govern the handling of personal and sensitive information.

POLICY SECTIONS

COLLECTION OF PERSONAL INFORMATION

AHRT collects personal information directly from individuals through:

- Enrolment forms,
- USI applications,
- Identification documents,
- Interviews and support needs assessments,
- Website and email enquiries,
- Learning management systems and assessment tools.

The types of personal information collected include:

- Name, address, contact details, date of birth,
- Emergency contact details,
- Employment or education history (if applicable),
- USI and identification documents,
- Information related to access and support needs,
- Training progress, results, and completion outcomes.

Sensitive information may be collected where required for training access or support (e.g., medical conditions, learning needs), but only with consent.

WHAT IS PERSONAL INFORMATION AND WHY DO WE COLLECT IT

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes names, addresses, email addresses, phone and facsimile numbers. This Personal Information is obtained in many ways including interviews, correspondence, by telephone, by email, via our website www.allonsitetrainingandassessment.com.au. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to NCVER and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing, email or by the phone.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

AHRT will only use personal information for legitimate purposes, including:

- Enrolling students and confirming identity,
- Verifying and creating USIs,
- Delivering training and assessment,
- Issuing AQF qualifications or statements of attainment,
- Reporting to regulatory bodies such as ASQA, NCVER, and state funding authorities,
- Contacting learners about course updates or support services,
- Conducting student surveys or collecting feedback (anonymously where possible),
- Meeting obligations under Australian law.

No information will be sold or used for unsolicited marketing.

SENSITIVE INFORMATION

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

THIRD PARTIES

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

DISCLOSURE OF PERSONAL INFORMATION

AHRT may disclose personal information to:

- The **National Centre for Vocational Education Research (NCVER)**, for AVETMISS reporting,

- The **USI Registry System**, as required under the Student Identifiers Act,
- **ASQA** or other regulatory agencies, during audits or investigations,
- **State or federal government departments** (e.g. for funding, licensing, or statistical reporting),
- **Third-party trainers/assessors** or **employers**, where students are enrolled via partnership arrangements—only with consent,
- Emergency services, if required for health or safety reasons.

Where disclosure is made to a third party, AHRT ensures that:

- It is required by law or agreed by the individual,
- The third party is bound by confidentiality and data protection obligations.

USI PRIVACY

In accordance with the **Student Identifiers Act 2014**:

- AHRT will not collect or create a USI without the student's written **consent**,
- Any personal information collected for USI purposes will be used solely for verification, record-keeping, or certificate issuance,
- **Identification documents** used for USI creation will be **securely destroyed** once no longer needed,
- USIs will **never** be included on AQF certificates, statements of attainment, or displayed publicly.

SECURITY OF PERSONAL INFORMATION

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in cloud based client files which will be kept by us for a minimum of 7 years.

AHRT stores all personal data securely in accordance with APP 11:

- Physical records are stored in locked offices or filing cabinets,
- Electronic data is held in password-protected systems with regular backups and restricted user access,
- Access is limited to authorised personnel with a need to handle that information,
- Cloud-based systems used for storage or learning must meet Australian data security standards.

In the event of a **data breach**, AHRT will act in accordance with the **Notifiable Data Breaches (NDB) scheme**, including notifying the Office of the Australian Information Commissioner (OAIC) and affected individuals as required.

ACCESS TO YOUR PERSONAL INFORMATION

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing. AHRT will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information. You are also able to update your personal information by accessing your aXcelerate account.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Students have the right to:

- Request access to their personal information,
- Request correction of inaccurate or out-of-date information.

Requests should be submitted in writing to the Compliance Manager. AHRT will respond within 10 business days.

MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records or update your information on aXcelerate, and we can then ensure we continue to provide quality services to you.

COMPLAINTS

If a person believes that their privacy has been breached or mishandled by AHRT, they can lodge a complaint by:

- Emailing or writing to the Compliance Manager,
- Outlining the nature of the breach and expected outcome.

Complaints will be investigated in line with AHRT's **Complaints and Appeals Policy**.

If unsatisfied, individuals may contact:

Office of the Australian Information Commissioner (OAIC)

Website: www.oaic.gov.au

Phone: 1300 363 992

Policy Updates

This Policy may change from time to time and is available on our website.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

613 Princes Highway, RUSSELL VALE NSW 2517

admin@aota.com.au

024 06 8378

EXCEPTIONS

Describe exceptions here.

RELATED POLICIES AND OTHER REFERENCES

Privacy Act 1988 <https://www.legislation.gov.au/C2004A03712/2019-08-13/text>

Australian Privacy Principles <https://www.oaic.gov.au/privacy/australian-privacy-principles>

National VET Data Policy <https://www.dewr.gov.au/national-vet-data/national-vet-data-policy>

National Vocational Education and Training Regulator Act 2011
<https://www.legislation.gov.au/C2011A00012/2021-09-01/text>

S New Standards for RTO's 2025 <https://www.dewr.gov.au/standards-for-rtos>

What is AVETMISS? <https://www.ncver.edu.au/rto-hub/what-is-avetmiss>

ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
CEO	Authoring and updating
CFO	Publishing on the internet
Administration Manager	Ensuring all personnel are informed

CONTACTS

List contacts in the table.

SUBJECT	CONTACT	PHONE	EMAIL
CEO	Sarah Burnett	42068378	admin@aota.com.au
CFO	Nigel Burnett	42068378	info@aota.com.au
Administration Manager	Robin Lore	42068378	robin@aota.com.au